Appendix C

Cultural Resources

Appendix C.1

Historical Report

HISTORIC RESOURCES GROUP

BUENA VISTA PROJECT
HISTORIC RESOURCES TECHNICAL REPORT

JUNE 2025



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1.0 INTRODUCTION

1.1 Purpose

The purpose of this technical report is to determine if historical resources as defined by the California Environmental Quality Act (CEQA)[1] are present in the Buena Vista Project Site ("Project Site") or the immediately surrounding area ("Expanded Study Area"), and if so, to identify potential impacts to historical resources caused by the proposed Buena Vista Project ("Project"). This report is intended to inform environmental review of the Project.

Under CEQA, the potential impacts of a project on historical resources must be considered. The purpose of CEQA is to evaluate whether a proposed project may have a significant adverse effect on the environment and, if so, if that effect can be reduced or eliminated by pursuing an alternative course of action or through mitigation measures.

The impacts of a project on an historical resource may be considered an environmental impact. CEQA states that:

A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.[2]

Thus, an evaluation of project impacts under CEQA requires a two-part inquiry: (1) a determination of whether the project site contains or is adjacent to a historical resource or resources, and if so, (2) a determination of whether the proposed project will result in a "substantial adverse change" in the significance of the historical resource or resources. This report investigates the Project Site and immediately surrounding area to determine if historical resources are present, and analyzes project impacts for any adverse change in the significance of such resources. In doing so, this report provides a comprehensive review of the historical resources that could be directly impacted by development activities on the Project Site, as well as a contextual assessment of historical resources that are located immediately outside the Project's footprint, referred to in this document as the Expanded Study Area.

1.2 Methodology

This report contains:

- A review of the existing buildings, structures, objects and landscape areas located on or immediately adjacent to the Project Site.

[1] California PRC, Section 21084.1.
[2] Ibid.

- A review of previous evaluations of the Project Site and immediately surrounding area through historic survey, environmental review, or other official actions.

- Identification and evaluation of historical resources within the Project Site and immediately surrounding area.

- Analysis of potential impacts to historical resources within the Project Site and immediately surrounding area under the California Environmental Quality Act (CEQA).

This report was prepared using primary and secondary sources related to the history and development of this area of the City of Los Angeles, as well as the development of the Project Site as a rail yard. Documents that were consulted include:

- Historical building permits

- Historical photographs and aerial images

- Sanborn Fire Insurance maps

- Historical periodicals

- Historical building plans

- Previous surveys

- Previous environmental reviews

- Local histories

- Historic context statements

- Los Angeles Historic-Cultural Monuments list

- California State Historic Resources Inventory, Los Angeles County

- Los Angeles Municipal Code

A records search was conducted on October 13, 2017 at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC), housed at California State University, Fullerton. The records search included a review of known previous cultural resource studies and previously documented historic or architectural resources in the Project vicinity.

(For the complete report from the SCCIC, see Appendix F.)

1.3 Project Team

Research, field inspection, and analysis were performed by Paul Travis, AICP, Managing Principal; and Kari Fowler, Senior Preservation Planner, both of whom are qualified professionals who meet or exceed the *Secretary of the Interior's Professional Qualification Standards*. Additional assistance was provided by Robby Aranguren, Planning Associate/GIS Specialist.

2.0 PROPOSED PROJECT

2.1 Project Location

The Project site is located at 1030–1380 North Broadway and 1251 North Spring Street, within the Chinatown neighborhood of Los Angeles and in the vicinity of downtown Los Angeles, Lincoln Heights, and Dodger Stadium/Elysian Park.

The Project site consists of Assessor's Parcel Number (APN) 5414-016-002 and is located southeast of North Broadway, north of the City's Downtown area. Primary vehicular access to the Project site is provided via North Broadway and via a short driveway that extends west from Spring Street and runs under the Metro A Line tracks and onto the Project site. The Project involves subdivision of the site, including the "North Parcel" and "South Parcel" master lots, and airspace lots for residential and commercial purposes.

TABLE 1. Parcels Comprising the Project Site

Parcel	APN	Address	Parcel Area	Tract
South Parcel	5414016002	1030-1322 N Broadway and 1251 N Spring Street	249,734 sf	Wilson's Buena Vista St Tract (MR 60-61)
North Parcel	5414016002	1380 N Broadway	122,279.1 sf	Freight Depot Tract (MR 72-75/76

Located in the Central City North Community Plan Area, the Project Site is bounded generally by North Broadway on the north and west, and the Los Angeles County Metropolitan Transportation Authority (Metro) A (Gold) Line right-of-way on the south and east. The Project Site runs along the east side of North Broadway between West College Street to the south and Elysian Park Drive to the north. The Project Site sits adjacent to the Los Angeles State Historic Park, the former site of Southern Pacific Railroad's River Station. The Project Site, which was also formerly a part of the River Station, is now separated from the rest of the rail yard site by the Metro light rail tracks.

The Project is situated north of downtown Los Angeles. It is surrounded by the communities of Chinatown to the north and west, Solano Canyon and Elysian Park to the north, and an industrial zone to the south and east. A bit further afield are Dodger Stadium and Chavez Ravine to the north and west, and the community of Lincoln Heights to the north and west. The Los Angeles River runs generally north-south in this area, east of the Project Site. The area is surrounded by freeways, including the Pasadena Freeway/Arroyo Seco Parkway (SR-110) approximately 650 feet west of the South Parcel; the Golden State Freeway (I-5) approximately 0.4 miles northeast of the North Parcel; and the Hollywood Freeway (US-101) located approximately 0.7 miles south of the South Parcel.

2.2 Project Setting

The Project Site is located in a highly-urbanized area of the city, built up primarily with one- and two-story commercial, residential, and institutional development. The area north of the Project Site consists of steep hillsides, including the southernmost portion of Elysian Park. Solano Canyon contains one-and two- single-family residences primarily dating from the late-19th and early-20th centuries. Development fronting North Broadway directly across from the Project Site includes single- and multi-family residential development from various periods, along with some institutional properties, including a high school, church and social hall, and a religious temple.

Southwest of the Project Site is the community of Chinatown. Development consists of primarily one- and two-story commercial buildings, mostly retail shops and restaurants, as well as a number of institutional properties, including several Chinese benevolent associations. Some of these Chinatown buildings date to the establishment of New Chinatown in this area in the late 1930s. The Metro A Line tracks run along the base of the bluff, defining the Project Site's southeastern boundary. Along the southernmost stretch of the Project Site, the light rail tracks are elevated on a concrete ramp to access Metro's Chinatown Station.

Immediately south of the Project Site is the Capitol Milling Company, a 19th-century flour mill complex, alongside a recent five-story residential complex at the corner of North Broadway and West College Street. South and east of the project site is the Los Angeles State Historic Park, which is largely open space with few built structures. Beyond the park, across North Spring Street, is an area developed with a mix of uses dominated by one-and two-story industrial development, various commercial uses, and a post-World War II public housing complex. *(For a Project Location Map and Project Vicinity Map, see Figures 1 and 2, respectively).*

Figure 1: Project Location Map

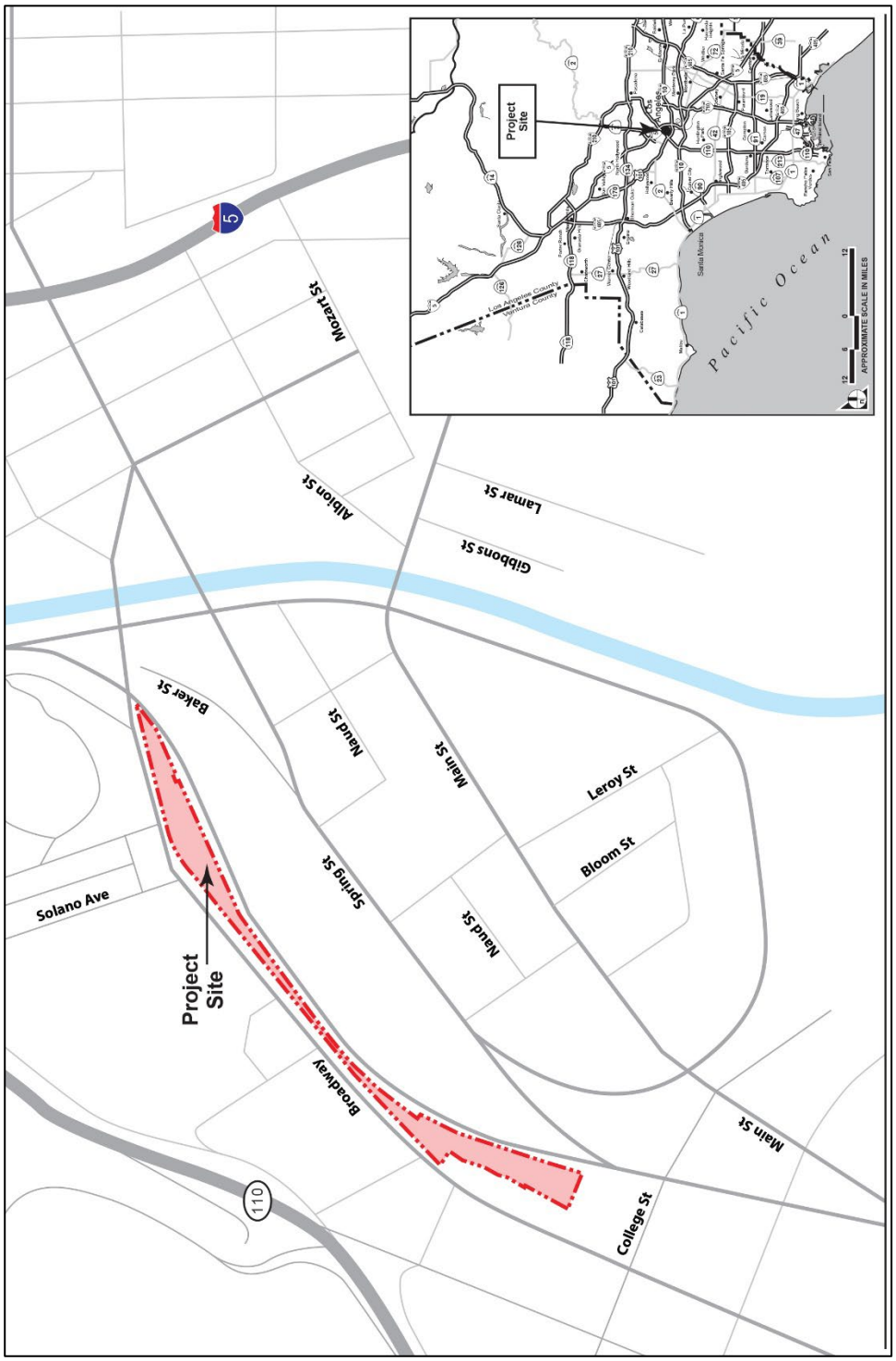


Figure 2: Project Vicinity Map



2.3 Project Description[3]

S&R Partners, LLC (Applicant) proposes the Buena Vista Project (Project) located at 1030–1380 North Broadway and 1251 North Spring Street, within the City of Los Angeles. The Project is a mixed-use residential and commercial development on an approximately 7.87-acre site. Project would construct up to 986 residential units including 200 affordable units, approximately 15,000 square feet of retail uses; 23,800 square feet of restaurant uses, and 116,610 square feet of outdoor trellis/overhang areas (circulation and balconies). The Project would include up to 1,245,536 sf of building floor area on the 342,817 sf (post-dedication) Project site, resulting in a Floor Area Ratio (FAR) of would be 3.63:1.

All existing structures on the Project site would be removed. On the South Parcel, demolition would include removal of a guard house at the entry gate, modular/portable office,[4] rectangular one-story metal auto repair building with vehicle bays and roll-up doors, wood trailer shed, vehicle shelter/wash bay, metal storage containers, trash enclosure, foundation remnants, as well as surface parking, asphalt-paved outdoor storage yard, utility infrastructure, retaining walls, and fencing. Additionally, an approximately 2,132 square foot addition to the rear of an existing off-site building (the "Golden Dragon Restaurant") and associated parking extends into the Project site within the parcel boundary and would require removal to accommodate the Project. There are no other off-site structures that encroach onto the Project site.

Chain-link fencing located along both sides of the sloped area between North Broadway and the Metro tracks, concrete foundations/footings, fencing, retaining walls, and trees would also be removed as part of the Project. Existing structures to be removed include approximately 19,900 sf of buildings *(see Table 2, below)*. Existing on-site billboards would either be removed or remain within the Project Site boundaries. In total, the Project Site has seven single-sided billboards and four double-sided billboards along North Broadway.

TABLE 2. Existing Uses To Be Removed

Existing Uses	Approximate Size (Square Feet)
Restaurant Building (partial demolition of Golden Dragon Restaurant)[a]	2,132
Modular Offices[5]	4,920
Maintenance Building (industrial building with roll-up bays)	12,800

[3] Description of the Project as provided by the Applicant.
[4] When this Project was initiated, the Project Site included a guard house and modular/portable office. These two structures have since been removed and are no longer extant on the Project Site.
[5] This structure is no longer extant on the Project Site.

Existing Uses	Approximate Size (Square Feet)
Guard Station[6]	48
Total	22,690
[a] Project site development requires the demolition of a 2,132 sf portion of an existing building that encroaches onto the Project site.	

PROPOSED USES

The Project involves subdivision of the site into the "North Parcel" and "South Parcel" master lots and airspace lots for residential and commercial purposes. Construction is anticipated to occur in two phases: Phase 1 for the South Parcel and Phase 2 for the North Parcel.

South Parcel Summary

The South Parcel includes 631 dwelling units and approximately 15,800 sf of restaurant and 10,000 sf of retail uses of as well as 3 levels of subterranean parking. From the elevation of North Broadway, the six-story Podium spans the South Parcel and includes 213 du and the 25,800 gsf of restaurant/retail areas. The South Parcel would be developed with a six-story podium connecting two buildings, Building 1, a 26-story building up to 343 feet 8 inches in height, and Building 2, a 22-story building up to 301 feet in height. The South Parcel includes approximately 931 parking spaces and 550 spaces for bicycle parking/storage within 3 levels located below the elevation of North Broadway. The South Parcel would include approximately 82,715 sf of open space, which includes 34,967 sf available to the public at the ground-level.

All parking garage levels on the South Parcel would be below the elevation of North Broadway, which is the higher elevation of the site, where the property fronts on North Broadway near Cottage Home Street at Building 2. At the Podium and at Building 1, portions of P-1 would be partially above the elevation of North Broadway, as this road has a declining slope in elevation towards the southwest; however, the partially above grade P-1 parking level would not be visible from North Broadway or areas to the northwest because views would be blocked by the existing buildings along North Broadway that are associated with Mandarin Plaza.

Due to changes in the existing grade elevations from North Broadway to the Los Angeles State Historic Park, P-1 and P-2 of the 3-level parking garage would be visible from the Metro A Line tracks to the south, which rise in elevation towards the Chinatown Station. The parking garage would also be visible from Los Angeles State Historic Park and from the adjacent Spring Street and Baker Street to the southeast,

[6] This structure is no longer extant on the Project Site.

although the rising elevation of the Metro A Line tracks and existing landscaping trees along the sidewalk of the Los Angeles State Historic Park would partially obscure views of the parking garage. The southeastern-facing portions of the parking structure would be enclosed within a solid exterior wall at P-3, and vine plantings on the landscaped screen wall would buffer views into P-1 and P-2 of the parking garage from the Los Angeles State Historic Park.

North Parcel Summary

The North Parcel would include 355 dwelling units, approximately 8,000 sf of restaurant, and 5,000 sf of retail space, constructed above a three-level parking garage. The North Parcel would be developed with a two-story podium connecting two buildings, the North Building, a 15-story building up to 209 feet 4 inches and the Courtyard Building, a six-story building up to 108 feet 8 inches in height. Additionally, the North Parcel would also include the Retail Block Building, a three story building up to 72 feet 4 inches in height. All restaurant and retail uses would be located on the ground floor (Level 1), all parking would be within the garage (Levels P-1 to P-3, below grade from North Broadway), and residential uses would be within each of the buildings and each of the levels on the North Parcel, as well as on the southeastern side of the building facing the Los Angeles State Historic Park, where residential units would line the parking garage Levels P-1 and P-2. The North Parcel would include approximately 50,234 sf of open space, which includes 10,410 sf available to the public at the ground-level. The North Parcel includes approximately 546 parking spaces and 252 spaces for bicycle parking and storage. All parking garage levels on the North Parcel would be below the elevation of North Broadway and would not be visible from North Broadway or from vantage points from areas to the northwest.

Due to changes in the existing grade elevations, all parking levels would be above grade near the Metro A Line tracks. Residential units facing towards the Los Angeles Historic Park would line levels P-1 and P-2, and the southeastern-facing portions of the parking structure, facing the Los Angeles State Historic Park, would be enclosed within a solid wall at P-3 (also see Figure 9A, North Parcel- Conceptual Landscaping Plan).

TABLE 3. Proposed Uses

Land Use	Description	Approximate Size (Gross Square Feet)
South Parcel		
Residential	631 du	706,854
Restaurant		15,800
Retail		10,000
Trellis/Building Overhangs		48,263
South Parcel Total Project Area		*780,917*

Land Use	Description	Approximate Size (Gross Square Feet)
North Parcel		
Residential	355 du	383,272
Restaurant		8,000
Retail		5,000
Trellis/Building Overhangs		68,347
North Parcel Total Building Area		*464,619*
Project Site Total		
Total Residential	986 du	1,090,126
Total Restaurant		23,800
Total Retail		15,000
Total Trellis/Building Overhangs		116,610
Total Project Area		1,245,536
sf: square feet; du: dwelling units		

The majority of the proposed residential units are studio units, one-bedroom units, two-bedroom units, and three-bedroom units. The Project also includes seven live-work units.

Design and Architecture

The Project would transform an existing primarily undeveloped Project Site into a modernized development providing a mix of high-quality residential and commercial uses with public and private open space amenities and landscaping. The Project Site is uniquely situated on a curvilinear shaped parcel that would be built on a south-facing slope that faces the Los Angeles State Historic Park. The Project Site spans approximately 0.6 miles along the southeast side of the North Broadway street frontage and would increase pedestrian activity through a combination of activating ground floor commercial uses, including seven live-work units, promenades, public open space amenities, and landscape improvements. All ground floor uses would be designed to maximize the visual connection to the street by providing floor to ceiling windows with non-reflective glass coatings. The buildings would be designed with the intent to create passive and active open space areas for both residents and visitors to utilize throughout the Project Site and to take advantage of the views of Downtown Los Angeles, as well as Los Angeles State Historic Park and the neighboring built environment. Rooftop terraces with pool decks would provide open space amenities for residents while outdoor ground-level hardscape areas and planted areas, including promenades, seating areas, courtyards, and plazas, would be publicly accessible and promote pedestrian activation and walkability at the street level. An abundance of shade trees, overhangs,

and landscaped trellis areas would be integrated throughout the Project Site to provide respite shade areas and create a pedestrian scale.

The proposed architecture reflects the mixed-use character of the area by utilizing cast-in-place concrete walls, structural steel, metal panels, fiber cement board, and glass/steel guardrails. Variations in the textures, colors, and sizes of these materials would allow for a unified design that links the overall Project, while differentiating individual buildings. Building massing and scale would provide vertical and horizontal plane changes along the façades of the buildings and provide a strong visual connection between the North and South Parcels.

A Central Greenspace would be constructed in the central portion of the Project Site connecting the North Parcel and the South Parcel. This narrow open space would link the North Parcel and South Parcel and would be landscaped with native trees and understory vegetation. While the sloped area of the Central Greenspace would be inaccessible to pedestrians due to steep southeast facing slopes, the Central Greenspace would be adjacent to the continuous sidewalk for pedestrians along Broadway, which would also be lined with new street trees.

Access

Access to the Project would be provided by one driveway on the South Parcel from North Broadway, three driveways on the North Parcel from North Broadway, and one driveway on the South Parcel from Spring Street. The South Parcel driveway from Spring Street would be located beneath the elevated Metro A Line tracks.

Off-Site Improvements

The Project would require minor off-site improvements that would generally be contained in the adjacent rights-of-way to the Project Site, including along North Broadway, Bishops Road, and Solano Avenue. Offsite improvements would include sidewalk dedications, street widenings and improvements, planting of street trees, roadway circulation improvements, installation of street lights, and removal and installation of various connections to underground utility infrastructure, and a signalized crosswalk on the North Parcel to provide connectivity to Elysian Park.

3.0 REGULATORY REVIEW

3.1 Historical Resources Under CEQA

CEQA requires that environmental protection be given significant consideration in the decision-making process. Historical resources are included under environmental protection. Thus, any project or action which constitutes a substantial adverse change to a historical resource also has a significant effect on the environment and shall comply with the State CEQA Guidelines.

When the California Register of Historical Resources was established in 1992, the Legislature amended CEQA to clarify which cultural resources are significant, as well as which project impacts are considered to be significantly adverse. A "substantial adverse change" means "demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

CEQA defines a historical resource as a resource listed in, or determined eligible for listing, in the California Register of Historical Resources. All properties on the California Register are to be considered under CEQA. However, because a property does not appear on the California Register does not mean it is not significant and therefore exempt from CEQA consideration. All resources determined eligible for the California Register are also to be considered under CEQA.

The courts have interpreted CEQA to create three categories of historical resources:

- *Mandatory historical resources* are resources "listed in, or determined to be eligible for listing in, the California Register of Historical Resources."
- *Presumptive historical resources* are resources "included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1" of the Public Resources Code, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.
- *Discretionary historical resources* are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources.[7]

To simplify the first three definitions provided in the CEQA statute, a historical resource is a resource that is:

- Listed in the California Register of Historical Resources (California Register);

[7] *League for the Protection of Oakland's Architectural and Historic Resources v. City of Oakland*, 52 Cal. App. 4th 896, 906-7 (1997).

- Determined eligible for the California Register by the State Historical Resources Commission; or
- Included in a local register of historic resources; or
- Identified as significant in an historical survey.

Section 15064.5 California Code of Regulations, Title 14 provides two additional definitions of historical resources, which may be simplified in the following manner. A historical resource is a resource that is:

- Identified as significant in a historical resource survey meeting the requirements of Public Resources Code 5024.1 (g);
- Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, this category includes resources that meet the criteria for listing on the California Register (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

The fact that a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, does not preclude a lead agency from determining that the resource may be an "historical resource" for purposes of CEQA.

Properties formally determined eligible for listing in the National Register of Historic Places are automatically listed in the California Register. Properties designated by local municipalities can also be considered historical resources. A review of properties that are potentially affected by a project for historic eligibility is also required under CEQA.

3.2 National and State Historic Designations

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

NATIONAL REGISTER OF HISTORIC PLACES

The National Register of Historic Places is an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection

from destruction or impairment.[8] The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects; eligibility for federal tax benefits; and qualification for Federal assistance for historic preservation, when funds are available.

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

The criteria for listing in the National Register follow established guidelines for determining the significance of properties. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects:

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

B. That are associated with the lives of persons significant in our past; or

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

D. That have yielded, or may be likely to yield, information important in prehistory or history.[9]

In addition to meeting any or all of the criteria listed above, properties nominated must also possess historic integrity. According to National Park Service guidance for applying National Register criteria, a property that is more than 50 years of age can be considered for listing in the National Register. Fifty years is a general estimate of time needed to develop historical perspective and therefore to evaluate historic significance.[10]

[8] 36CFR60, Section 60.2.
[9] 36CFR60, Section 60.3.
[10] *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (Washington, DC: National Park Service, 1995), 41.

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register is an authoritative guide in California used by state and local agencies, private groups, and citizens to identify the State's historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.[11]

The criteria for eligibility for listing in the California Register are based upon National Register criteria. These criteria are:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

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

- California properties formally determined eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory), the National Register of Historic Places.
- State Historical Landmark No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation (OHP) shall review their eligibility for the California Register in accordance with procedures to be adopted by the State Historical Resources Commission (commission).
- Points of historical interest which have been reviewed by the OHP and recommended for listing by the commission for inclusion in the California Register in accordance with criteria adopted by the commission.[12]

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

- Individual historic resources.

[11] California PRC, Section 5023.1(a).
[12] California PRC, Section 5023.1(d).

- Historic resources contributing to the significance of a historic district.
- Historic resources identified as significant in historic resources surveys, if the survey meets the criteria listed in subdivision (g).
- Historic resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria.
- Local landmarks or historic properties designated under any municipal or county ordinance.[13]

Guidance for applying the California Register criteria does not provide a specific age threshold for eligibility. However, it does state that "sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource."[14]

3.3 Historic Significance

The definition of *historic significance* used by the California Office of Historic Preservation (OHP) in its administration of the California Register is based upon the definition used by the National Park Service for the National Register. Historic significance is defined as *the importance of a property to the history, architecture, archaeology, engineering, or culture of a community, state, or the nation*.[15] It is achieved in several ways:

- *Association with important events, activities or patterns*
- *Association with important persons*
- *Distinctive physical characteristics of design, construction, or form*
- *Potential to yield important information*

A property may be significant individually or as part of a grouping of properties.

3.4 Historic Integrity

Historic integrity is the ability of a property to convey its significance. It is defined as the

[13] California PRC, Section 5023.1(e).
[14] California Office of Historic Preservation, *Technical Assistance Series #6, California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register)*, (Sacramento, CA: California Department of Parks and Recreation), 3.
[15] *National Register Bulletin 16A. How to Complete the National Register Registration Form* (Washington D.C.: National Park Service, U.S. Department of the Interior, 1997), 3.

"authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic period."[16] The National Park Service defines seven aspects of integrity: *location, design, setting, materials, workmanship, feeling,* and *association*. These qualities are defined as follows:

- *Location* is the place where the historic property was constructed or the place where the historic event occurred.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.[17]

3.5 Period of Significance

The National Park Service defines the *period of significance* as "the length of time when a property was associated with important events, activities or persons, or attained the characteristics which qualify it for... listing" in National, State or local registers. A period of significance can be "as brief as a single year... [or] span many years." It is based on "specific events directly related to the significance of the property," for example the date of construction, years of ownership, or length of operation as a particular entity.[18]

3.6 Historic Districts

Standard preservation practice evaluates collections of buildings from similar time periods and historic contexts as *historic districts*. The National Park Service defines a historic district as "a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical

[16] Ibid.
[17] National Register Bulletin 15, 44-45.
[18] *National Register Bulletin* 16A, 42.

development."[19] A historic district derives its significance as a single unified entity.

According to the National Park Service, "a district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole." Some examples of districts include business districts, college campuses, large estates, farms, industrial complexes, residential areas and rural villages.[20]

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

3.7 Local Considerations

CITY OF LOS ANGELES GENERAL PLAN CONSERVATION ELEMENT

The City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.[21]

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level:

- Historic-Cultural Monument (HCM)
- Classification by the City Council as a Historic Preservation Overlay Zone (HPOZ)

[19] *National Register Bulletin* 15, 5.
[20] Ibid.
[21] City of Los Angeles, Conservation Element of the General Plan, pages II-3 to II-5. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed October 11, 2021.

CITY OF LOS ANGELES CULTURAL HERITAGE ORDINANCE

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Cultural Heritage Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating an HCM. The CHC is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The Cultural Heritage Ordinance states that a HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature and meet one of the following criteria. A Historic-Cultural Monument is 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. A proposed Monument may be designated by the City Council upon the recommendation of the Commission if it meets at least one of the following criteria:

- Is identified with important events of national, state, or local history; or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community;

- Is associated with the lives of historic personages important to national, state, city, or local history; or

- Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.[22]

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs.

CITY OF LOS ANGELES HISTORIC PRESERVATION OVERLAY ZONE (HPOZ) ORDINANCE

The Los Angeles City Council adopted the ordinance enabling the creation of HPOZs in 1979; most recently, this ordinance was amended in 2017. The City currently contains 35 HPOZs. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.[23] Each HPOZ is established with a historic resources survey, a historic context statement, and a preservation plan. The historic resources survey identifies all

[22] City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.
[23] City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

Contributing and Non-Contributing features and lots. The context statement identifies the historic context, themes, and subthemes of the HPOZ as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing Elements are defined as any building, structure, Landscaping, or Natural Feature identified in the Historic Resources Survey as contributing to the Historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the Alterations are determined reversible by the historic resources survey.[24] For CEQA purposes, Contributing Elements are treated as contributing features to a historic district, which is the historical resource. Non-Contributing Elements are any building, structure, Landscaping, Natural Feature identified in the Historic Resources Survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, Non-Contributing Elements are not treated as contributing features to a historical resource.

CITY OF LOS ANGELES HISTORIC RESOURCES SURVEY (SURVEYLA)

SurveyLA is a Citywide survey that identifies and documents potentially eligible historical resources representing important themes in the City's history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning's OHR. The program was managed by OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially significant resources that reflect important themes in the City's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys, conducted from 2010-2017, were completed in three phases by Community Plan area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by Community Redevelopment Agencies. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

Los Angeles' Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historical resources surveys in the City of Los Angeles. The context statement was organized using the Multiple Property Documentation (MPD) format developed by the National Park Service for use in nominating properties to the National Register. This format provided a consistent framework for evaluating historical

[24] City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

resources. It was adapted for local use to evaluate the eligibility of properties for city, state, and federal designation programs. The HCS used Eligibility Standards to identify the character defining, associative features and integrity aspects a property must retain to be a significant example of a type within a defined theme. Eligibility Standards also indicated the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These Eligibility Standards are guidelines based on knowledge of known significant examples of property types; properties do not need to meet all of the Eligibility Standards in order to be eligible. Moreover, there are many variables to consider in assessing integrity depending on why a resource is significant under the National Register, California Register or City of Los Angeles HCM eligibility criteria. SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed. Resources identified through SurveyLA are not designated resources. Designation by the City of Los Angeles and nominations to the California or National Registers are separate processes that include property owner notification and public hearings.

4.0 EXISTING CONDITIONS

4.1 Project Site Description

The Buena Vista Project Site is located at 1030-1380 North Broadway and 1251 North Spring Street, in the City of Los Angeles. The Project Site comprises a long and narrow, irregular-shaped property spanning approximately 8.08 acres. The Project Site is bounded generally by North Broadway on the north and west, and the Metro A Line right-of-way on the south and east. It sits adjacent to the Los Angeles State Historic Park, the former site of Southern Pacific Railroad's River Station, established in 1875. The Project Site was also formerly a part of the River Station, but is now separated from the rest of the rail yard site by the Metro A Line light rail tracks.

The Project Site can generally be divided into three sections: a southwestern section, a central section, and a northeastern section. The Project Site is largely characterized by a steep slope or bluff which defines its southeastern boundary for much of its extent, with the exception of the southernmost portion of the site, where the bluff cuts across the property. Due to this slope, the majority of the Project Site is level with North Broadway, which sits above and overlooks the Los Angeles State Historic Park property to the south and east below. The southernmost portion of the Project Site sits at the base of the bluff, and is level with the Metro A Line tracks and the State Park.

The southwestern section is the most developed of the Project Site's three sections, containing several buildings and an asphalt-paved parking area. This is also one of the widest sections of the Project Site. Because much of this area was level with the rail yard site, the majority of River Station-related development that occurred on the Project Site over time appeared in this section. The central section is very narrow between North Broadway and the bluff. Much of the section is covered by grass and weeds, with concrete remnants of limited development from earlier eras. The northeastern section widens once again, creating a flat, unpaved area accessible of off North Broadway. This area is currently used by the Los Angeles County Metropolitan Transportation Authority (Metro) for the storage and staging of vehicles and equipment and as a construction staging/bus parking area. The central and northeastern sections are lined with a number of free-standing billboards, oriented to motorists traveling along North Broadway. The majority of the Project Site is surrounded by six- to eight-foot chain-link fencing, portions of which are topped with coiled barbed wire. An eight-foot chain-link fence separates the Project Site from the Metro A Line right-of-way.

The following table and map identify all extant physical features (including buildings, structures, objects, remnant features, etc.) evident on the Project Site. *(See Table 5 and Figure 3, below.)* Each of these features was observed and photographed during several visits to the Project Site in 2017, 2018, and 2021. *(For field photographs of the features on the Project Site, see Appendix E.)*

Table 5: Extant Features on the Project Site

Map No.	Feature Name	Feature Description	Development History	Year Built
1	Wayside Communications Office[25]	One-story portable office building, composed of two parts forming an L-shaped plan, nearly-flat roof, wood panel siding, flush metal sliding windows, exterior metal stairs and access ramps.	Built by Modular Space Corporation for owner SR Partners.	2009
2	Vehicle shelter	Open shelter, steel post-and-beam frame, corrugated metal roof and two sides, two open sides.		2009
3	Southern Pacific Railroad (SPRR) Auto Repair Garage	Long, narrow industrial building, rectangular plan, metal frame, corrugated metal side-gable roof, corrugated metal walls, series of vehicular bays with pull-up and roll-up metal doors, open north façade, steel industrial windows.	Built in phases between 1953 and 1958 by the Southern Pacific Railroad Co., designed by architect W.F. Meaney. Building started as a 40'x160' steel garage and a separate 40'x40' prop wash rack to the north, with multiple additions over time, connecting the original buildings and extending the building northward. Identified uses include prop garage and wash rack, auto repair shop and wash rack, and motor car repair shop.	1953-1958
4	Golden Dragon Restaurant Rear Addition	Rear portion of the commercial building at 960 N Broadway, rectangular plan, flat roof, stucco walls. (Front portion of the building is not located on the Project Site).	Front (west) portion originally built as an auto and truck showroom and garage, built by owner Gilbert Quan. Subsequent uses over time include a hot dog stand, a neon sign company, and a restaurant. A 1971 permit indicates that the rear 30 feet of the building extends onto the adjacent property (Project Site) and is being leased.	1946 (original building), 1955 (rear addition)

[25] When the Project was initiated, this feature was present on the Project Site, and it remained extant as of the site visit on February 27, 2018. This structure has since been removed and is no longer extant on the Project Site as of the site visit on October 15, 2021.

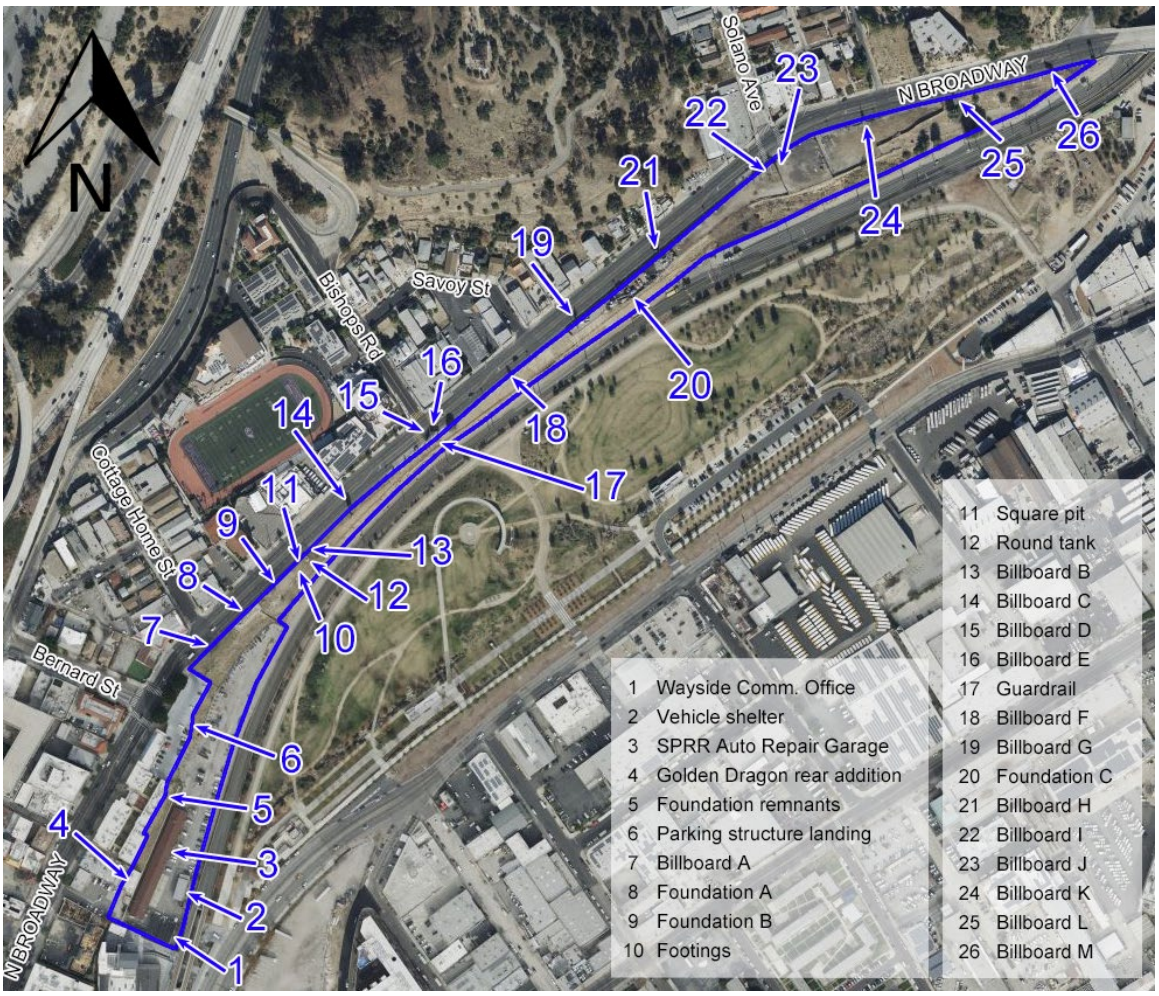
Map No.	Feature Name	Feature Description	Development History	Year Built
5	Foundation remnants	Two concrete foundation remnants, situated behind Mandarin Plaza at 978 N Broadway.	These appear to be two remnant pieces of a concrete foundation. No information suggesting what these remnants may have been associated with historically.	Unknown
6	Parking structure landing	Concrete landing with chain link fencing, attached to rear (east) façade of the Mandarin Plaza parking structure at 978 N Broadway.	The Mandarin Plaza parking structure was constructed in 1972. This concrete landing extends from the rare façade of the parking structure and appears to be located on the Project Site.	1972
7	Billboard A	Freestanding steel-frame commercial billboard, one sided.		Unknown
8	Foundation A	Concrete building foundation at 1040-1046 N Broadway, rectangular plan.	This foundation appears to be a remnant of a cold storage/ wholesale seafood building, built in 1949 for owner Wallace Lee Gown. From at least 1956 to 1961, the building housed the Terminal Refrigeration Co. The building was demolished sometime between 1961 and 1964.	1949
9	Foundation B	Concrete building foundation at 1050 N Broadway, generally rectangular plan.	This foundation appears to be a remnant of a mid-century restaurant building. In 1950, the site contains a small one-story restaurant building. By 1953, the building has a one-story front addition. By 1961, the building is vacant, owned by Wallace Lee Gown. In 1964, it is described as a vacant restaurant, and in 1965 as a vacant café. It is unknown when the building was demolished.	pre-1950
10	Footings	Cluster of approximately a dozen concrete building footings at 1054 N Broadway, square base with tapered sides.	These footings appear to be remnants of a late-19th century dwelling. In 1894, the site contains a one-story single-family residence. It is unknown when the dwelling was demolished, but it is no longer extant by 1950.	c. 1894

Map No.	Feature Name	Feature Description	Development History	Year Built
11	Square pit	Board-formed concrete pit, approximately five feet square and three feet deep.	The original use of this pit is unknown. However, it may have been associated with the late-19th century dwelling that was located at 1054 N Broadway.	Unknown
12	Round tank	Round subterranean concrete tank, concave top level with the ground. (The existing tank is only partially exposed above ground; thus, its full extent is unknown).	This concrete tank may be a later replacement for two elevated 50,000-gallon water tanks at this approximate location in 1906. The original elevated tanks appear to have been built by Southern Pacific Railroad, which was associated with an adjacent well and pumping station just north of the tanks. It is unknown when the original elevated tanks were removed (but they are gone by 1950), or when the existing concrete tank was built.	Unknown
13	Billboard B	Freestanding steel-frame commercial billboard, one-sided.		Unknown
14	Billboard C	Freestanding steel-frame commercial billboard, two-sided.		Unknown
15	Billboard D	Freestanding steel-frame commercial billboard, one-sided.		Unknown
16	Billboard E	Freestanding steel-frame commercial billboard, one-sided.		Unknown
17	Guardrail[26]	Metal (iron or steel) guardrail at Bishops Road, cruciform newel posts with ball tops, riveted metal straps in a lattice pattern, set on a low concrete wall.	Research could not determine a date for this feature. However, based on its material and design, it appears to date from the early 20th century. It is unclear if this was constructed by the railroad or if it is a piece of early public infrastructure.	Unknown (likely early 20th century)

[26] This guardrail is situated at the sidewalk, along the current property line of the Project Site. For purposes of environmental review, this feature is presumed to be located on the Project Site as part of a three-foot dedication in this area.

Map No.	Feature Name	Feature Description	Development History	Year Built
18	Billboard F	Freestanding steel-frame commercial billboard, two-sided.		Unknown
19	Billboard G	Freestanding steel-frame commercial billboard, one-sided.		Unknown
20	Foundation C	Concrete building foundations (multiple), asphalt paving, concrete retaining wall at the edge of the bluff.	These concrete foundations and retaining walls may be remnants of a Southern Pacific tenement building and a cluster of five detached store and dwelling structures at 1356-1364 N Broadway, which appear at this approximate location on the 1894 Sanborn map. Alternately, these remnant features may be associated with a one-story two-flat residence at 1324 and a one-story dwelling at 1326 N Broadway, which appear at this approximate location on the 1906 Sanborn map. Per the 1950 and 1953 Sanborns, there is a small one-story gas and oil building at 1322 N Broadway, at this approximate location.	Unknown
21	Billboard H	Freestanding steel-frame commercial billboard, one-sided.		Unknown
22	Billboard I	Freestanding steel-frame commercial billboard, one-sided.		Unknown
23	Billboard J	Freestanding steel-frame commercial billboard, one-sided.		Unknown
24	Billboard K	Freestanding steel-frame commercial billboard, two-sided.		Unknown
25	Billboard L	Freestanding steel-frame commercial billboard, two-sided.		Unknown
26	Billboard M	Freestanding steel-frame commercial billboard, one-sided.		Unknown

Figure 3: Map of Extant Features on the Project Site



Source: Bing Maps ©

4.2 Expanded Area of Study

Beyond the Project Site, this investigation includes analysis of potential Project impacts on historical resources in its immediate vicinity. With this in mind, an "Expanded Study Area" was defined to include parcels immediately adjacent to the Project Site. This Expanded Study Area includes parcels along the west side of North Broadway, across from the Project Site, between Elysian Park Drive to the north and Gin Ling Way to the south. Also included in the Expanded Study Area are the Capitol Milling Company property, immediately south of the Project Site, as well as the former site of Southern Pacific's River Station, now the Los Angeles State Historic Park.

The following table and map identify all properties within the Expanded Study Area. *(See Table 6 and Figure 4, below.)* Each of these properties was observed and photographed during several site visits, including in 2017, 2018, and 2021. *(For field photographs of the properties in the Expanded Study Area, see Appendix E.)*

TABLE 6. Properties in the Expanded Study Area

APN	Address	Name	Description	Year Built
5414019007	1253 N Bishops Rd	Cathedral High School	High school campus (not fully visible from the public right-of-way).	1930, 1949, 1960
5414015010	950 N Broadway	Shiseido	One-story commercial building, vernacular design.	1947, 1981
5414008016	951 N Broadway	DSR Design, Inc.	Two-story mixed-use building, East Asian Eclectic style, includes a garden with water feature, decorative mosaic, and painted mural by Tyrus Wong.	1940
5414008016	951 N Broadway	Realm	Two-story mixed-use building, East Asian Eclectic style.	1940
5414008007	957 N Broadway	Bing Kong Tong Society of Los Angeles; Chinese Free Masons	Two-story mixed-use building, East Asian Eclectic style, retail storefronts and benevolent association above.	1949
5414015009	960 N Broadway	Golden Dragon Restaurant	One-story commercial building, East Asian Eclectic style.	1946
5414008018	969 N Broadway	Phoenix Bakery	Two-story commercial building, East Asian Eclectic style, includes pole sign.	1977
5414007022	977 N Broadway	Far East National Bank	Five-story commercial office building, Late Modern style.	1983
5414015008	978 N Broadway	Mandarin Plaza and parking structure	Two-story shopping plaza with central courtyard, attached concrete block parking structure.	1972
5414007011	989 N Broadway	Lung Kong Tin Yee Association	Two-story mixed-use building, East Asian Eclectic style, retail storefronts and benevolent association above.	1949

APN	Address	Name	Description	Year Built
5414007016	993 N Broadway	Soo Yuen Fraternal Association	Three-story mixed-use building, East Asian Eclectic style, retail storefronts and benevolent association above.	1949
5414007015	999 N Broadway	Royal Pagoda Motel	Two-story motel, Mid-Century Modern with East Asian Eclectic influence, includes pole sign.	1964
5414017001	1001 N Broadway		Service station, Streamline Moderne style.	1951
5414017024	1011 N Broadway		Three-story mixed-use building, vernacular design.	1962
5414018029	1029 N Broadway		One-story commercial office building, Mid-Century Modern style.	1955
5414018002	1031 N Broadway		Two-story mixed-use building, retail storefronts with office above, brick vernacular design.	1890, 1926
5414018001	1039 N Broadway		Surface parking lot, four-bay garage building.	1972
5414018025	1041 N Broadway	St. Peter's Italian Catholic Church (property includes "The Immigrants" Sculpture")	Church building, Spanish Colonial Revival style, includes "The Immigrants" sculpture, a piece of abstract public art in the parking lot.	1946 (church), 1971 (sculpture)
5414018026	1045 N Broadway	Casa Italiana (property includes the "Replica of Lupa Capitolina Statue")	One-story social hall building, Spanish Colonial Revival style, includes the "Replica of Lupa Capitolina" statue adjacent to the building entrance.	1972 (casa), 1930 (statue)
5414021007	1201 N Broadway		One-story industrial building, vernacular design.	1924
5414021008, 5414021021	1217-1221 N Broadway		Surface parking lot.	
5414021011	1231 N Broadway	Li Hing of Hong Kong, Inc.	One- and two-story industrial building, vernacular design.	1934
5414022004	1301 N Broadway		Two-story mixed-use building, vernacular design.	1960
5414022005	1305 N Broadway	Xuan Wu San Charity	Buddhist temple, one-story building and decorative entrance gate, East Asian Eclectic.	2002

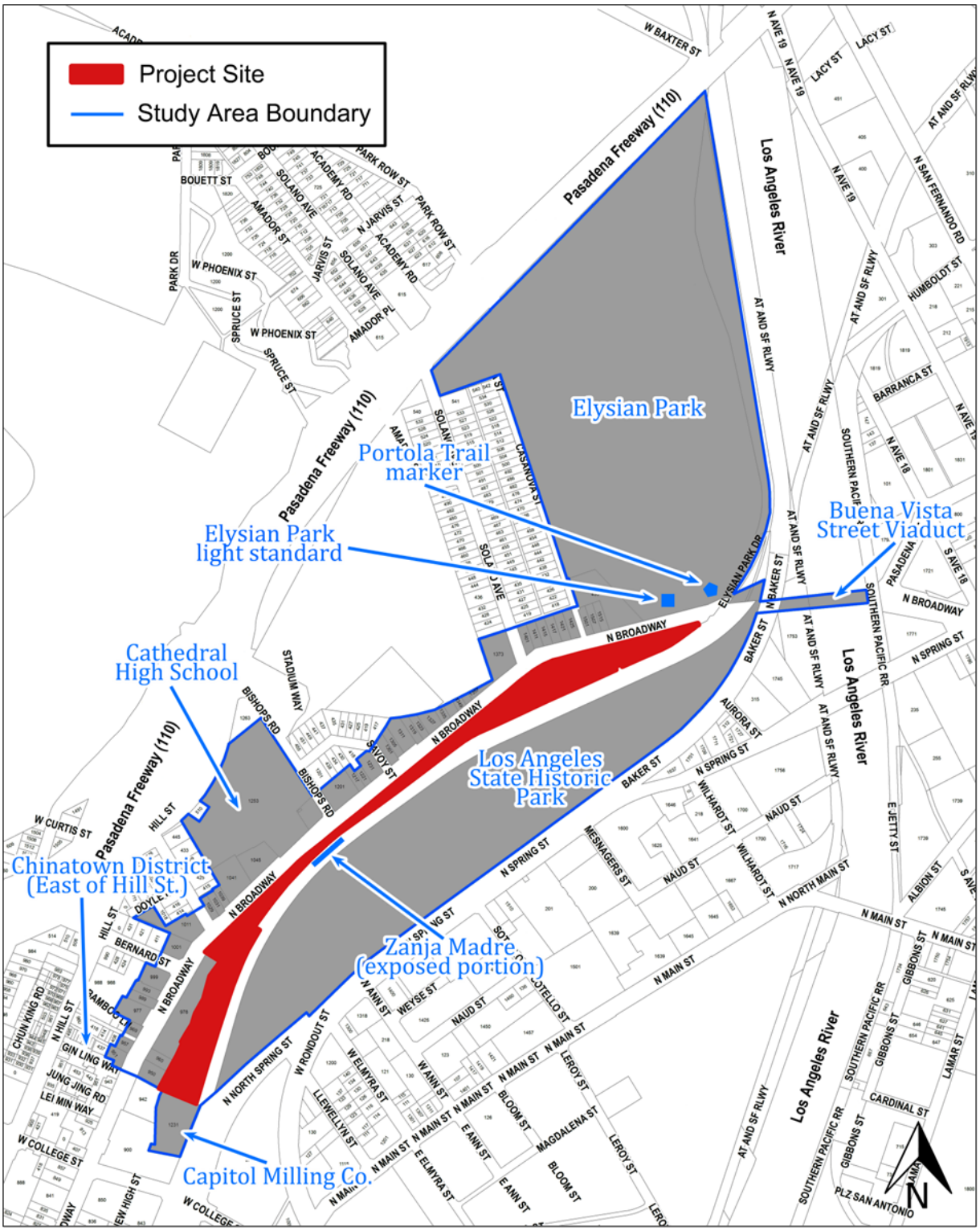
APN	Address	Name	Description	Year Built
5414022016	1311 N Broadway		Three-story multi-family residential building, vernacular design.	1989
5414022008	1319 N Broadway		Two-story four-flat multi-family residential building, Craftsman style, includes stone retaining wall at the sidewalk.	1920
5414022009	1323 N Broadway		One-story commercial building, vernacular design.	1922
5414022010	1327 N Broadway		Two-story multi-family residential building, vernacular design, includes stone retaining wall at the sidewalk.	1885
5414022014	1335 N Broadway		Two-story single-family residential building, vernacular design.	1884
5414022013	1349 N Broadway	Quan Yum Temple	Buddhist temple, three-story building, vernacular design.	1983
5414022011	1357 N Broadway		Surface parking area, shallow dirt lot backing up to steep hillside.	
5414023031	1373 N Broadway	Norton Electric Wholesale	One-story commercial/light industrial building, brick vernacular design.	1922
5414025025	1401 N Broadway	Cordoba Corporation	One-story commercial office building, Postmodern style.	1920
5414025026	1411 N Broadway		One-story commercial office building, vernacular design.	1924
5414025027	1415 N Broadway		Two-story single-family residential building, vernacular design.	2011
5414025028	1417 N Broadway		Three-story multi-family residential building, vernacular design.	1959
5414025029	1421 N Broadway		Two-story single-family residential building, Transitional Craftsman style.	1902
5414025030	1425 N Broadway		Building on the property is not visible from the public right-of-way, includes stone retaining wall at the sidewalk.	1952

APN	Address	Name	Description	Year Built
5414026019, 5414026020, 5414026021	1501-1511 N Broadway		Vacant lot.	
5414026023	433 W Casanova St	Casanova Garden Apartments	Three-story multi-family residential building, contemporary design.	1998
5414014001	1231 N Spring St	Capitol Milling Company, Stearns Mill, Eagle Mills	Late-19th century flour mill, brick vernacular design, currently undergoing substantial renovation.	1883
5414016903	1245 N Spring St	River Station (now Los Angeles State Historic Park)	Site of Southern Pacific Railroad's River Station, converted into a state park, mostly landscaped open space with few built features.	1875 (rail yard), 2017 (LASHP)
5414027900		Elysian Park (portion)	Public park spanning some 600 acres. Only a small portion of the park sits opposite the Project Site. Features include stone retaining walls, Portola Trail California Historical Landmark No. 655 marker, and a monumental gas lamp marking park entrance.	1886
5414016805		Zanja Madre (exposed portion)	Partially exposed 75-foot segment of brick conduit, situated at the base of the bluff, along the northern edge of the Metro A Line right-of-way, surrounded on three sides by a poured-concrete retaining wall to protect it from potential landslides from the adjacent bluff.[27]	c. 1875

[27] The Zanja Madre was originally an open irrigation ditch which conveyed water from the Los Angeles River to the Los Angeles pueblo. In this area, the Zanja Madre ran along the base of the bluff that now defines the southeastern boundary of the Project Site. With the establishment of River Station in 1875, the Zanja Madre was embedded in the sandstone bluff and encased in brick and concrete. This partially exposed 75-foot segment, situated in the Metro A Line right-of-way, was unearthed by work crews in 2005. Additional unexposed remnants of the Zanja Madre are known to be extant on the Project Site. The Zanja Madre is addressed in detail in the Cultural Resource Evaluation and Impact Assessment for the Buena Vista Project. As such, this feature is not evaluated in this report, and potential impacts of the Project to this feature are not analyzed herein.

APN	Address	Name	Description	Year Built
		Buena Vista Street Viaduct (now called the North Broadway Bridge)	Concrete arch bridge carrying Broadway (formerly Buena Vista Street) over railroad tracks and the Los Angeles River, open spandrels, period lamp posts, monumental gates, highly architectural.	1909-1911

Figure 4: Map of Properties in the Expanded Study Area



5.0 HISTORIC CONTEXT

5.1 Introduction

The area of the city where the Project Site is located contains some of the oldest developed areas in Los Angeles. It is within a mile of the last recorded location of Yang-na, one of the largest Tongva villages in the area.[28] It is near the site where Gaspar de Portolá's expedition is believed to have camped along the Los Angeles River in 1769. It is about a mile north of the place where settlers from Spain and Mexico founded the Los Angeles Pueblo in 1781. It contained a portion of the city's first public works project, the *Zanja Madre*, which irrigated Los Angeles' earliest agricultural fields. It was along this stretch of the Los Angeles River that the riverfront began to industrialize under U.S. control beginning in 1847. And it was here that the Southern Pacific Railroad established "River Station" in 1875, linking Los Angeles to the rest of the country through the transcontinental rail network, and ensuring Los Angeles' place as a major industrial and commercial center in the western United States.[29]

Today, some of the original industrial and commercial buildings still exist along this stretch of the Los Angeles riverfront. The Standard Oil Company of California buildings on North Spring Street served as facilities for what would become Chevron Corporation, one of the most powerful corporations in the world. The Baker Iron Works site on North Broadway was an industrial pioneer in Los Angeles – manufacturing streetcars, water distribution systems, and oil drilling products – and establishing the surrounding area as a premier steel and iron manufacturing center in California. Capitol Milling Company on North Spring Street was one of Los Angeles' leading enterprises, specializing in milling grains to produce flour, cereal, and other food products which were transported nationwide. Today, these buildings, along with the site of Southern Pacific's River Station, provide a window into Los Angeles' past and serve as tangible symbols of the industries that allowed the city to grow and thrive in the late-19th and early-20th centuries.[30] In addition to being one of Los Angeles' oldest industrial zones, this area is surrounded by some of the city's earliest neighborhoods, from Lincoln Heights to the east, to Solano Canyon and Elysian Park to the west, and Chinatown to the south.

5.2 Tongva/Gabrielino Village of Yang-Na

The Project Site lies in the traditional territory of the Native American group known as the Tongva. Beginning some 3,500 years ago, the Tongva occupied the area encompassed by today's Los Angeles basin, San Fernando Valley, San Gabriel Valley, San

[28] *LASHP General Plan*, 2005, 3.
[29] *Historic Resources Survey, Cornfield Arroyo Seco Specific Plan Area, City of Los Angeles, Los Angeles County, California*, prepared by LSA Associates, Inc., June 3, 2011, 11-12.
[30] *Historic Resources Survey, CASP*, 2011, 11-12.

Bernardino Valley, and the coast.[31] The Tongva people were one of the most prosperous and successful of California's Native American cultural groups, with a complex social system and highly adaptive culture.[32] Historic accounts suggests that the Tongva numbered between 5,000 and 10,000 at the time of European contact.[33] The Tongva are thought to have resided in large, politically autonomous, socially stratified villages.[34] One of the major ethnographic Tongva villages was the *Yang-na* (or *Yaanga*). Located along the bench lands adjacent to the Los Angeles River in the vicinity of El Pueblo de Los Angeles, Yang-na is believed to have been one of the largest Tongva villages in the region.[35] The name "Gabrielino" would later be applied to the Tongva by the Spanish, as many of these indigenous people would come to live and work on the lands of the San Gabriel Mission.

5.3 Spanish Colonial and Mexican Period

In 1542, Juan Rodriguez Cabrillo led the first European expedition to explore what is now the west coast of the United States. Explorers with Cabrillo's expedition encountered native people on land and sea voyages, making what is thought to be the first known contact with Alta California's indigenous tribes.[36] While Cabrillo claimed California for the Spanish Crown at this time, Spanish settlement would not reach this territory for another two hundred years.

On July 14th, 1769, Don Gaspar de Portolá, governor and military leader of Baja California, led the first expedition to colonize Alta California. Accompanied by Franciscan friars Junípero Serra and Juan Crespí, Portolá took a group of 64 men northward from San Diego toward Monterey. The Yang-na village was first encountered on August 2nd, as the expedition passed through present-day downtown Los Angeles, camping along the east bank of the Los Angeles River just south of where it is joined by the Arroyo Seco. The expedition was visited by the local native people from a nearby village thought to be Yang-na.[37] Fr. Crespí names the spot "El Pueblo de Nuestra Señora la Reina de los Ángeles del Río Porciúncula (translating as "town of Our Lady the Queen of Angels of the River Porciúncula.") The following day, the expedition crossed the river, likely passing along the northern portion of the Project Site. Here, Crespí describes encountering "a great vineyard of [wild] grapevines and countless rose bushes having a great deal of open blossoms, all of it a very dark friable soil." They continued westward over grass-covered terraces approximately one mile south where they encountered the

[31] *Los Angeles State Historic Park Cultural History and Archaeology Report*, prepared by California Department of Parks and Recreation, August 2011, 5.
[32] *LASHP Master Development Plan*, 2012, 3.
[33] *LASHP Cultural History Report*, 2011, 5.
[34] *LASHP Master Development Plan*, 2012, 1.
[35] *LASHP Master Development Plan*, 2012, 2.
[36] *LASHP Master Development Plan*, 2012, 1.
[37] *LASHP Cultural History Report*, 2011, 4-5.

village of Yang-na, believed to be near the current site of *El Pueblo de Los Angeles*.[38]

On September 8th, 1771, Spanish colonists established Mission San Gabriel, the fourth of an eventual 21 Spanish missions in California, and the first in this area. Much of the area's native population would be recruited to work the San Gabriel Mission lands. Seven years later, in 1778, Governor Felipe de Neve received approval for the creation of a civil pueblo along the *Río la Porciúncula*. Persuaded by Crespi's earlier descriptions of a well-watered valley with good soils for growing crops and an ample native population to work the land, the Spanish colonial government ordered Governor Neve to establish a settlement at this location and name the new pueblo *La Reina de los Angeles* ("Queen of the Angels").[39]

EL PUEBLO DE LOS ANGELES AND THE ZANJA MADRE

By May of 1780, Governor Neve had maps and plans drawn up for the layout and settlement of the new pueblo. As legend has it, on September 4th, 1781, Captain Fernando de Rivera y Moncada led a group of 44 Spanish and Mexican settlers (or *pobladores*) from San Gabriel Mission, escorted by a military detachment and two Mission priests, to the site Crespi has chosen for the new pueblo. Upon their arrival, this first group of settlers was joined by a number of recently-converted neophyte Gabrielinos from the Yang-na village. *El Pueblo de Los Angeles* was officially founded under the Spanish Laws of the Indies under the reign of King Carlos III. Although all land was deemed the property of the King of Spain, the pueblo was assigned one square league for its use. The Governor directed that house lots (*solares* or *sitios*) be established around a public plaza and be assigned to each settler family.[40]

Upon the establishment of *El Pueblo de Los Angeles*, one of the first improvements was the excavation of the *Zanja Madre* ("Mother Ditch"). The *Zanja Madre* was the first irrigation ditch to convey water from the Los Angeles River to the pueblo and adjacent agricultural lands. The ditch was constructed along the base of the slope just south and east of present-day North Broadway (on the Project Site) using Gabrielino labor.[41] The ditch reflected the initial and essential relationship of the water to Los Angeles' development and prosperity. Typical of the pueblo system of providing common lands and water to individuals, the lands north and east of the plaza were established as common planting lots.[42] The success of the zanja system was the first, and most essential, public works project for the new pueblo. This connection to the river would help make the fledgling frontier settlement an agricultural success when many others in

[38] *LASHP General Plan*, 2005, 17.
[39] *LASHP General Plan*, 2005, 17.
[40] *LASHP General Plan*, 2005, 17. The original plaza appears to have been located somewhat northeast of the current plaza.
[41] In the 1870s, when the land below the slope became Southern Pacific Railroad's River Station, the City of Los Angeles encased the Zanja Madre in brick and concrete. Today, a rare known segment of the original zanja is visible on the Project Site, just northwest of the Metro A Line right-of-way at the edge of the Los Angeles State Historic Park.
[42] *Los Angeles State Historic Park Interpretive Master Plan*, prepared by California State Parks, August 23, 2006, 8-9.

Alta California struggled.[43]

The earliest record of agricultural use of this area dates to 1804, when vineyards were established by Francisco Avila on the land now occupied by the Los Angeles State Historic Park ("Park Site"), immediately adjacent to the Project Site. These vineyards may have been some of the first in Los Angeles, and predecessors to the city's first important industry. By 1817, the pueblo was reported to have had over 53,000 vines under cultivation. Viticulture would continue to be the Los Angeles area's top agricultural activity until the 1860s.[44]

The Project Site and adjacent Park Site are located within the historic floodplain of the Los Angeles River. In 1815, a large flood altered the course of the river, cutting a new main channel to the west which flowed along present-day North Spring Street (now the southern boundary of the Park Site),[45] and continuing south along present-day North Alameda Street. The flood forced the relocation of the plaza southwest to its current site in 1818. Another flood in 1825 drove the channel back to the east.[46]

In 1821, Mexico won its independence from Spain and Alta California became a territory of the new Mexican Republic, marking an end to Spanish colonial rule in the region. The political and social control of the military and religious leadership began to shift toward the secular and private sector, and to native-born Californios. As the largest civil settlement in the territory, with some 650 residents by 1820, the pueblo was gaining more economic and political influence in the territory. The Mexican government had opened up trade with foreign ships and legalized immigration of foreigners. New arrivals to Alta California, some from New England and Europe, settled in the pueblo, converting to Catholicism and becoming Mexican citizens.[47]

The new Mexican government sought to diminish the influence of Spain in the region, as the Spanish missions largely remained loyal to the Roman Catholic Church in Spain. At the same time, there was a need for more grazing lands to increase commerce in the hide and tallow trade. Thus, beginning in 1834, the Mexican government began to secularize the missions, confiscating mission lands to be distributed in large land grants called *ranchos*. Pío Pico, the last governor of Alta California, subdivided the former mission lands into large tracts, granting them to various prominent *Californios*. However, the one square league of the pueblo remained intact. In 1835, the Mexican government promoted the pueblo of Los Angeles to the rank of *ciudad* ("city") and made it the territorial capital of Alta California.

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[43] *LASHP General Plan*, 2005, 18.
[44] *LASHP General Plan*, 2005, 17.
[45] *LASHP Master Development Plan*, 2012, 10.
[46] *LASHP General Plan*, 2005, 18.
[47] *LASHP General Plan*, 2005, 17.

5.4 Cityhood and Early Agriculture

United States troops began occupying Alta California in 1846, at the advent of the Mexican-American War, and soon gained possession of Los Angeles itself. However, Alta California would not officially come under American rule until February 2nd, 1848, with the signing of the Treaty of Guadalupe Hidalgo, which ceded the California territory to the United States and ended the war. In 1849, Los Angeles officials hired Lieutenant Edward Ord to survey Los Angeles' public lands in order to offer them up for sale. Ord mapped Los Angeles in July and August, providing invaluable depictions, both in maps and sketches, of the pueblo as its existed in the middle of the 19th century. In the *Plan de la Ciudad de los Angeles*, Ord's first official city survey dated August 29th, 1849, the pueblo lands were formally mapped at 28 square miles, with the area in the vicinity of the Project Site and Park Site shown as agricultural in use.[48] Los Angeles was incorporated as an American city on April 4th, 1850. Five months later, on September 9th, California was admitted to the Union as its 31st state. At this time, the U.S. census counted 1,610 non-Native American inhabitants in Los Angeles, including two Chinese men.[49]

During the 1840s and 1850s, Los Angeles was the largest and most prosperous of the Alta California pueblos. The discovery of gold in northern California in 1848 had a significant effect on southern California as well, and specifically on Los Angeles. Much of the city's growth during this period came from nearly 10,000 Sonoran miners who had come into California to work the gold fields but were later expelled due to anti-Mexican sentiment. As these migrants returned south, many chose to settle in Los Angeles, specifically congregating in an area northwest of the plaza along present-day North Main Street and North Broadway. This area, located just southwest of the Project Site and Park Site, soon took on the nickname "Sonoratown." The neighborhood now known as Solano Canyon, just north of the Project Site, was first settled in 1866. By 1860, the City's population had almost tripled to 4,385, while retaining its Hispanic majority. It is also during this time that the *zanja* water system was expanded and a city position of *Zanjero* (ditch man) was created to oversee the system.[50]

Los Angeles also drew economic benefits from the gold rush, particularly in the sale of cattle and wine to its northern neighbors. The brief prosperity of the cattle industry in Los Angeles was decimated by drought and floods and other environmental factors by 1865. Los Angeles' wine makers, however, thrived during the 1850s and 1860s. Spanish colonial winemaking pioneers such as the Avilas helped to make wine Los Angeles' chief product well into the 1870s, when over six million vines were planted in the Los Angeles area.[51] American immigrant William Wolfskill started the first commercial grove near

[48] *LASHP Master Development Plan*, 2012, 4.
[49] *LASHP Master Development Plan*, 2012, 4.
[50] *LASHP General Plan*, 2005, 19.
[51] *LASHP Interpretive Master Plan*, 10.

present-day 4th and Alameda streets. By the mid-1850s, his grove was reportedly the largest of its kind in the United States, and considered a "show place" for Los Angeles' agricultural promise. While Wolfskill and others would experiment with a wide variety of agricultural products, it would be citrus that would provide the first agricultural "gold rush" for the Los Angeles region.[52]

The pace of industrialization along the Los Angeles riverfront, which had started in the 1830s, quickened under U.S. control. The first industrial plant along the river was a three-story flour mill, constructed in 1831 by Abel Stearns. Stearns was a wealthy American merchant and ranchero who had moved to Los Angeles in 1829, and would eventually become its richest citizen. He located his mill on open land just north of the pueblo, near the southern end of what is now the Project Site and Park Site, powering the plant with water from the *Zanja Madre*.[53]

In 1858, Judge William G. Dryden established the Los Angeles Water Works, the region's first water company, and erected a massive wooden water wheel on the slope just east of present-day Broadway. The water wheel diverted water from the *Zanja Madre* onto the blufftop where pipes distributed it to a brick reservoir in the plaza. The water wheel was short-lived, however, having been destroyed by floods in the early 1860s.[54] In 1868, the Los Angeles water system started using iron pipes.[55] In 1870, former Governor Pío Pico opens Pico House, the city's first multi-story hotel, at the plaza. The 400-seat Merced Theater, the city's first building designed expressly for theatrical purposes, opens next door. By this time, the city water system had 50 miles of *zanjas*, and a population of 5,728.[56]

5.5 Southern Pacific and "River Station"

As early as the 1850s, Federal railroad surveys had considered Los Angeles as a potential terminus or hub for a southern transcontinental railroad. In 1872, the Southern Pacific Railroad Company offered to build a rail connection in Los Angeles that would extend north to San Francisco and Sacramento, and east to Yuma, Arizona and beyond. In return, Southern Pacific requested payment in the value of five percent of the county's total land value in cash, control over the existing Los Angeles & San Pedro railroad (built

[52] *LASHP Interpretive Master Plan*, 2006, 10; LASHP Cultural History Report, 2011, 19. In 1878, the Wolfskill family sends the first shipment of oranges east via Southern Pacific and it arrives in St. Louis in good shape, sparking a commercial agricultural boom for Southern California citrus.
[53] *LASHP Master Development Plan*, 2012, 4.
[54] *LASHP Cultural History Report*, 2011, 16.
[55] *LASHP Master Development Plan*, 2012, 5.
[56] *LASHP Master Development Plan*, 2012, 5; Relationship of the Zanja Madre to MTA's Gold Line Property in River Station Yard, City of Los Angeles, California, prepared by Cogstone Resource Management Inc., July 2004, 7. According to one account, the Zanja Madre was an open ditch along the base of the bluff until 1877, when a tunnel over 3,000 feet long was cut into the sandstone of the bluff. However, within a few months the tunnel had caved in. Despite attempts to repair it by partially relining it with brick, the tunnel continued to fail and ultimately was abandoned.

in 1869 from Los Angeles to Wilmington), and land for use as a station and yard.

Later that year, the citizens of Los Angeles approved a bond issue for $600,000 and agreed to the railroad's other demands. The property selected for the new depot and yard was the land that now coincides with the middle portion of the Park Site.[57] Arcadia Bandini de Stearns, daughter of a prominent Mexican Californio family and widow to Abel Stearns, was owner of the property at the time. Abel Stearns had acquired the property in support of his flour mill, located just south of the Park Site. The new rail yard site was considered to be "far from the center of town," yet made what had been relatively low value agricultural land into much more valuable real estate. Bandini de Stearns donated the first parcel of the property to Southern Pacific in 1873.[58] By the end of the year, Southern Pacific had starting laying tracks from the new Los Angeles Junction, or "River Station" (the present-day Park Site) northbound toward San Francisco.[59] With this facility, Los Angeles would join the national rail network and undercut San Diego's bid as the main Southern California rail port.[60]

By 1875, Southern Pacific's River Station was under construction at what is now the Project Site and Park Site. Initial development included a depot, a small freight house, and several shop buildings, built to complement the newly-constructed rail line that connected Los Angeles to points north.[61] Upon its opening later that year, "Los Angeles Junction" (as it was then known) was already a regionally significant railroad transportation hub. By 1876, rail lines connected Los Angeles to the East Coast via the transcontinental railroad.[62] In 1879, the two-story Pacific Hotel opened for business next to the existing depot, with its featured "parlor sitting room" and 25-minute meal service for through passengers.[63]

River Station continued to expand after its initial opening, eventually consisting of a roundhouse with turntable, freight house, blacksmith shop, machine shop, transfer table, car shop, paint shop, coal dock, and other facilities.[64] Also at this time, the Zanja Madre, running along the base of the slope at the northern edge of the rail yard property, was encased in brick and concrete. With the completion of the southern transcontinental route between Los Angeles and New Orleans in 1881, River Station would soon need to accommodate substantial increases in passenger and freight traffic. Over the next decade, Southern Pacific would purchase what is now the northern portion of the Park Site, referred to on some maps as the "Bull Ring," and continue to

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[57] *LASHP Cultural History Report*, 2011, 19. Southern Pacific actually received a total of 600 acres, including the rail yard site and extensive rights-of-way.
[58] *LASHP General Plan*, 2005, 19.
[59] *LASHP Master Development Plan*, 2012, 5.
[60] *LASHP Cultural History Report*, 2011, 19.
[61] *LASHP Master Development Plan*, 2012, 5; LASHP General Plan, 2005, 20.
[62] *LASHP General Plan*, 2005, 19-20.
[63] *LASHP Master Development Plan*, 2012, 6.
[64] *LASHP Master Development Plan*, 2012, 3; Sanborn fire insurance maps.

expand its facilities.[65]

By 1883, the volume of passenger traffic was such that a new depot and hotel with restaurant were constructed to replace the original depot. Southern Pacific then moved the original depot building to the south end of the property and incorporated it into a new expanded freight house. By the mid-1880s, River Station included a 26-stall roundhouse with turntable, coaling and wood house, full set of maintenance shops, and a large icing facility (most importantly for the citrus industry) on the expanded property. For the next decade, the River Station served as the main headquarters for Southern Pacific operations, passenger service, and freight service. By this time, Southern Pacific had become Los Angeles' largest employer, with more than 300 workers, many of whom occupied new residential neighborhoods surrounding the station property.[66]

In its first years, River Station served as the key transportation center for Southern Pacific in Southern California, both for freight and passengers. Many carloads of equipment and supplies passed through the station each day as the line advanced eastward toward El Paso. The arrival of the Southern Pacific railroad also helped sell Southern California and Los Angeles to the rest of the country, leading to a short boom in the 1870s.[67] Los Angeles' population more than doubled during the decade, expanding from 5,728 to 11,170.[68] River Station served as the arrival point for many of these travelers and immigrants who flocked to the Southland in the late-19th century.[69]

However, it was the arrival of Los Angeles' second national railroad line, the Santa Fe Railway in 1885, that triggered a rate war and led to the massive Boom of the 1880s. A year later, the Southern Pacific made an agreement to allow the Santa Fe Railway to use River Station for passenger service, and for a short while River Station noted on timetables as "Union Depot."[70] Within two years, the population of Los Angeles grew to over 50,000 and suburban neighborhoods soon spread out to the east across the river, and to the south and west of the old plaza. In 1887 alone, Southern Pacific brought 120,000 boomers to Los Angeles, the first electric streetcars began running on the city's streets, and $100 million in former rancho lands were sold.[71]

The intensive railroad activity had its effect on the development of the area surrounding River Station. Former agricultural lands near the station quickly became surrounded with railroad and other industrial activity. In 1883, Herman Levi and Jacob Loew purchased the Stearns flour mill and expanded it into a five-story structure with its own railroad siding, establishing the Capitol Milling Company. After oil is discovered near

[65] *LASHP General Plan*, 2005, 20.
[66] *LASHP General Plan*, 2005, 20.
[67] *LASHP Cultural History Report*, 2011, 17.
[68] *LASHP General Plan*, 2005, 20.
[69] *LASHP Cultural History Report*, 2011, 17.
[70] *LASHP General Plan*, 2005, 21.
[71] *LASHP Cultural History Report*, 2011, 20.

downtown in 1892, the Standard Oil Company of California built one of its first refinery facilities on Aurora (now Baker) Street adjacent to the river and the rail yard, with additional buildings later on San Fernando (now North Spring) Street.[72] Baker Iron Works, an influential industrial pioneer in Los Angeles, was established on Buena Vista Street (now North Broadway), just across the *zanja* from the rail yard.[73] Various other foundries, manufacturers, and other shops were soon established in proximity to the rail yards, filling the area east of the station with a mixture of industrial plants and warehouses alongside the small bungalows and boarding houses for railroad workers.[74] In 1889, the Los Angeles Electric Railway Company extended trolley lines northward from downtown to River Station, crossing over the rail lines on an elevated iron viaduct spanning San Fernando Street (present-day North Spring Street), and also out from downtown on the Downey Street Bridge into Boyle Heights.[75]

With such an expansion in traffic, the new depot at River Station proved inadequate to handle all the volume. In May 1887, only a year after completing new additions to the 1883 depot, Southern Pacific announced plans to build a new passenger depot two miles south on Alameda Street near 4th Street. In 1889, the ornate Arcade Depot was opened and served as Southern Pacific's main passenger terminal until 1915. The River Station Depot/Pacific Hotel continued operations until 1902 when it was removed from the original site and incorporated into a new, larger freight house at the south end of the property.[76] In 1894, Semi-Tropic Homestead Company developed a housing tract near River Station, and negotiated with Southern Pacific to build a pedestrian bridge to span the rail yard, providing access from Buena Vista Street (present-day Broadway).[77]

With the Arcade Station handling the majority of passenger service, River Station was expanded to handle the massive volume of freight, mostly from Southern California's burgeoning citrus industry. In 1897, the River Station freight yards were extended another 1,500 feet down Alameda Street where several large shipping houses were constructed.[78] By 1904, all shop activities had been moved from River Station to the newly-completed "General Shops Yard" across the river in what is now Lincoln Heights.[79] At this time, the turntable, roundhouse, and maintenance shops were dismantled and reconstructed at the new site. The old foundations were then buried

[72] *Historic Resources Survey, CASP*, 2011, 11-12. Standard Oil Company of California was one of the "seven sisters," referring to the seven companies that dominated the world oil industry in the mid-20th century. It would later become the Chevron Corporation, one of the most powerful corporations in the world.

[73] *Historic Resources Survey, CASP*, 2011, 11-12. Baker Iron Works 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.

[74] *LASHP General Plan*, 2005, 22.

[75] *LASHP Master Development Plan*, 2012, 6.

[76] *LASHP Master Development Plan*, 2012, 7.

[77] *LASHP Master Development Plan*, 2012, 6.

[78] In October of 1899, the "Freight Depot Tract" was recorded with the County of Los Angeles, and includes the River Station and Capitol Milling Co. sites.

[79] *LASHP General Plan*, 2005, 21.

and graded flat for new rail.[80] With that, all of the original buildings dating to the time of Southern Pacific's River Station facility had been demolished or dismantled.[81] However, River Station remained very busy, continuing to serve as Southern Pacific's main freight facility into the early-20th century.[82]

By the turn of the 20th century, the rapid growth of the facilities and activities at River Station were but a small microcosm of what was happening in Los Angeles generally. By 1900, Los Angeles had doubled its population from the previous decade, and was now a city of over 100,000 residents. Starting with the Great Boom of the 1880s, thousands of new residents, most from the Midwest and Eastern United States, transformed the overall demographics of the city to that of an Anglo-American majority. However, in the older, more industrial areas of the city such as River Station and its surrounding neighborhoods (Sonoratown, Solano Canyon, El Pueblo, Old Chinatown, Lincoln Heights), the population became more ethnically diverse. Ethnic Mexican, Italian, German, Irish, and Chinese residents often provided the workforce for the railroads and other rapidly growing industries along the riverfront.[83]

Also during this period, areas surrounding River Station became almost entirely industrial, as the few remaining shops and bungalows gave way to new and expanded manufacturing facilities. In 1908, the City zoned the area around River Station, east of North Broadway to the river's edge, as Industrial District No. 1, despite the fact that the area was still home to thousands of poor and working-class residents.[84] For the next two decades, River Station was the nerve center of Southern Pacific's multimillion-dollar freighting operations in Los Angeles. The facility employed 400 to 500 workers on around-the-clock shifts, moving an estimated 85,000 freight cars through the yard per month, often blocking city streets surrounding the yard all day long.[85]

THE DECLINE OF "RIVER STATION"

As Los Angeles continued to spread out and decentralize, so did the Southern Pacific Railroad. In 1925, Southern Pacific transferred supervision of its freight operations from River Station to its newer, much larger facilities at Taylor Yard, approximately two miles north on the east side of the river. From this point onward, River Station served as an adjunct facility to Taylor Yard. In 1931, Southern Pacific completed a new double-track line along the east bank of the river that limited the amount of freight routed through downtown.[86] Although reduced in status, River Station continued to be an important facility. In 1935, it became the key station for Southern Pacific's daily "Overnight" *Coast*

[80] *LASHP Master Development Plan,* 2012, 6-7.
[81] *LASHP Cultural History Report,* 2011, 36.
[82] *LASHP Master Development Plan*, 2012, 3.
[83] *LASHP General Plan*, 2005, 22-23.
[84] *LASHP Master Development Plan*, 2012, 7.
[85] *LASHP Master Development Plan*, 2012, 7.
[86] *LASHP General Plan*, 2005, 23.

Merchandise Express freight trains to San Francisco and Portland.[87]

The area around River Station saw dramatic changes during the 1930s and 1940s. In the early 1930s, the city began to discuss plans for a new passenger rail terminal. Ultimately, the site selected for the new rail facility was the "Old Chinatown" neighborhood, just east of the pueblo. Beginning in 1933, existing residents and businesses were forcibly removed to make way for the new Union Station. Gradually, Chinese residents re-establish their homes and businesses just north of downtown and south of River Station, transforming the area then known as "Sonoratown" into "New Chinatown." The Union Station rail terminal, which replaced "Old Chinatown," opened on May 3rd, 1939.

The initial development of "New Chinatown" was a complex undertaking as explained in the Chinese American context developed by the City for SurveyLA:

> *New Chinatown was initially anchored by two master-planned developments, both of which opened in 1938: the New Chinatown development (also known as Chinatown Central Plaza) to the north, and China City to the south.*
>
> *In response to the displacement of the occupants of Old Chinatown, businessman and community leader Peter Soo Hoo, Sr. joined with other Chinese business owners to create the Los Angeles Chinatown Project Association (later renamed the Los Angeles Chinatown Corporation) in 1937. The association gathered their own personal finances to purchase land for a new Chinatown. Acting on behalf of the association, Soo Hoo worked with Santa Fe Railway land agent Hebert Lapham to purchase a plot of land north of Old Chinatown, between Buena Vista Avenue (later North Broadway) and Hill Street, from the Atchison, Topeka & Santa Fe Railway.*
>
> *The New Chinatown development was conceptualized by Chinese American civic leaders who sought to counter common perceptions of Chinatowns as dangerous neighborhoods of unpaved, crime-filled alleyways by incorporating romantic stereotypes associated with China. The development was unique in that Chinese Americans controlled and distributed these images to visitors with the goal of establishing New Chinatown as a mixed-use development that would also be an important tourist destination and integral economic force in the City of Los Angeles. To this end, the association engaged noted architects Erle Webster and Adrian Wilson to create a master plan for a pedestrian village that would serve as a central hub for commerce and tourism. Webster & Wilson drafted a plan for a low-scale commercial center aligned to a system of interior pedestrian streets and a central plaza.*
>
> *Webster & Wilson designed some of the most elaborate buildings on the plaza,*

[87] *LASHP Master Development Plan,* 2012, 8.

enthusiastically embracing many of the architectural details of Asian architecture. Building designs incorporated complex, sweeping rooflines with flared eaves and upturned rafter tails, decoratively carved brackets, and roof beams. Buildings were painted in bright colors and topped with clay tile roofs. Within a year of construction, neon accents were added to highlight these features. Two pailou (gateways) at Hill Street (West Gate) and Broadway (East Gate) were erected in 1938 and 1939, respectively, to anchor the entrances to the development and establish its overall aesthetic (West Gate and East Gate are City of Los Angeles Historic-Cultural Monuments No. 825 and 826, respectively.) Other features of the development included ornamental streetlights, hanging lanterns, decorative metal balustrades, a wishing well near West Gate designed by Prof. Henry K. Liu to resemble the sacred Seven Star Cavern in Guangdong Province, a landscaped fish pool near East Gate designed by Louie Hong Kay, and two smaller gates at either end of Lei Min Way.[88]

In 1940, the six-mile Arroyo Seco Parkway (today's Pasadena Freeway), was completed west of River Station, making it the first modern "freeway." While the parkway was a landmark achievement in automobile transportation, locally the freeway severed neighborhoods like Solano Canyon and Elysian Park from their neighbors to the east. Also at this time, the U.S. Army Corps of Engineers began a massive project to channelize the Los Angeles River, finally addressing the constant yet unpredictable flooding that plagued the areas adjacent to the river. By the time the project was completed in the 1950s, the concrete-encased Los Angeles River was the world's most extensive flood control basin, carrying storm water and other runoff some 60 miles south to San Pedro and the harbor.[89]

Southern Pacific continued its heavy utilization of the River Station facility for active freight operations during and after World War II. In particular, River Station served as an important early "intermodal" facility, where freight could be transferred directly from rail to truck in containers.[90] In 1953, Southern Pacific initiated some of the first "trailer-on-flat car" (TOFC) container service at River Station, where truck trailers are loaded directly onto flatbed rail cars. By the 1960s, River Station still served a few remaining industrial clients, although year by year more businesses and factories relocated their operations out of River Station to newer and larger industrial complexes away from the city center.[91]

By the 1970s, the railroad and industrial landscape that had dominated River Station and surrounding neighborhoods was deteriorating. Old industrial properties were

[88] "SurveyLA Los Angeles Historic Context Statement, Context: Chinese Americans in Los Angeles 1850-1980," prepared for the City of Los Angeles Office of Historic Resources, October 2018, 34-35.
[89] *LASHP Cultural History Report*, 2011, 21.
[90] *LASHP Master Development Plan*, 2012, 8.
[91] *LASHP General Plan*, 2005, 24.

abandoned and closed up, and the once frantic pace of activity slowed. The opening of newer large yards and facilities throughout the five-county metropolitan area signaled the imminent demise of the "downtown" rail facilities of Taylor Yard and River Station.[92] In the face of this reality, in 1971 the Los Angeles Cultural Heritage Board declared the River Station area as Historic-Cultural Monument No. 82.[93] In 1978, a fire destroyed the 1902 freight house, a portion of which had been the original Pacific Hotel. In 1983, Southern Pacific constructed a new rail car-to-truck loading area. While River Station had been at the forefront of intermodal freight service the since the early 1950s, it was not until 1984 that Southern Pacific formally renamed the facility the "Spring Street Intermodal Center."[94] Despite the new name, operations were slowly being reduced.[95] Although, perhaps more indicative of River Station's coming fate was the formal closure of Taylor Yard the following year.[96]

On October 1st, 1992, Southern Pacific ceased all rail activities at the River Station facility, including the adjacent Bull Ring Yard at the northern part of the site.[97] Soon, any remaining structures were dismantled and the property was closed. So ended the 117-year run of River Station, which had once been the epicenter of industrial Los Angeles and served as the catalyst for so much of the city's early growth and development.[98] Four years later, in 1996, the Southern Pacific Railroad Company sold its assets to Union Pacific, thereby ending its existence as a corporate entity.[99]

5.6 Los Angeles State Historic Park

In the mid-1990s, as Union Pacific was looking to divest itself of the River Station property, discussions were underway among various interest groups who had strong ideas about how one of the largest undeveloped parcels in this very dense area of the city should–and should not–be redeveloped. By this time, the civic landscape had changed from the days when government and business leaders removed whole communities with little or no voice for those directly affected. The environmental movement of the 1950s and 1960s had a great impact on the role of citizens and communities in land use planning and development. In California, passage of laws such as the California Environmental Quality Act (CEQA) in 1970 now required public input

[92] *LASHP General Plan,* 2005, 24.
[93] Letter from Kenneth Ross, General Manager, Cultural Heritage Board 7.22.1971. The "River Station Area/Southern Pacific Railroad" was officially designated by the City's Cultural Heritage Board in a letter dated July 22nd, 1971. The HCM boundary, as described, extends from North Broadway on the west to North Spring Street on the east, and includes what is now the Project Site and the Park Site. The letter does not describe the site's extant features at the time of designation.
[94] *LASHP Master Development Plan*, 2012, 9.
[95] *LASHP Master Development Plan,* 2012, 3.
[96] *LASHP Master Development Plan,* 2012, 9.
[97] *LASHP Master Development Plan,* 2012, 9.
[98] *LASHP General Plan*, 2005, 25.
[99] *LASHP General Plan*, 2005, 27; *LASHP Cultural History Report*, 2011, 17-18.

to be considered during development projects.[100] In Los Angeles, local civic engagement and community organizing was on the rise, ultimately resulting in the creation of the Neighborhood Council System and the Department of Neighborhood Empowerment in 1999.

Also at this time, support from numerous community organizations and a wide range of interest groups was coalescing around the idea of revitalizing the Los Angeles River. Leading the fight for the river was the grassroots organization *Friends of the Los Angeles River* (FoLAR). Formed in 1985, this non-profit group of concerned citizens worked to rally support for the reclamation and restoration of the Los Angeles River and its surrounding neighborhoods. Starting in 1991, FoLAR, joined by scholars, design professionals, citizens, and politicians, focused efforts toward the closed rail yards at Taylor Yard and River Station in furthering river restoration plans and subsequent neighborhood revitalization.[101]

By the 1990s, the future of the two old rail yard properties had been the subject of much debate for many years. In 1984 and 1989, the Los Angeles City Planning Department identified the two former rail yards as opportunity sites for mixed-use (residential and commercial) development. In 1993, the City's *Downtown Strategic Plan* recommended as many as 12,000 dwelling units for the River Station property. The Los Angeles Unified School District, considered the site for a new high school or operations facility, just as private developers were eying the property for a possible sports arena.[102]

In 1998, in a joint planning effort with the USC School of Architecture, FoLAR organized four planning sessions in the surrounding neighborhoods. These sessions spawned the *River Through Downtown Conference*, which gathered elected officials, community members and activists, design professionals, and environmental groups to create a design for the River Station property that included housing; commercial and retail space; park, recreation and open space; a school; and a "canal" to represent the *Zanja Madre*. FoLAR's ability to bring these disparate groups together resulted in the partnering of various community and business organizations in an effort to reconnect the River Station site and surrounding communities to the river.[103]

Just as this community plan was taking shape, in 1999 Majestic Realty unveiled a proposal to re-develop the River Station site as a large warehouse and manufacturing complex. Supported by the Mayor's office and the Office of Economic Development, the project called for a public/private partnership that would harness several local, state, and Federal funding sources, including brownfield remediation funds. The project promised large numbers of new jobs and economic revitalization for the site and

[100] *LASHP General Plan,* 2005, 26.
[101] *LASHP General Plan*, 2005, 26.
[102] *LASHP General Plan*, 2005, 27.
[103] *LASHP General Plan,* 2005, 27.

surrounding neighborhoods.[104] In response to this proposal, in 2000 a local coalition formed under the name *Chinatown Yards Alliance for the Cornfield* to oppose the Majestic project and stimulate support for the site's reuse as a public park.[105] In 2001, with legal assistance from the Environmental Justice in Los Angeles Project, the Alliance sued to stop the project under CEQA.[106] Ultimately, the legal challenges to the project were upheld, and Federal agencies withdrew their subsidies, effectively killing the project.[107]

In 2001, with the Majestic project successfully stopped, members of the Alliance agreed to work with the developer to persuade the State of California to purchase the site for development as a park.[108] That same year, the California Department of Parks and Recreation ("State Parks") sponsored a study to determine the feasibility of adding the 32-acre parcel to the California State Park System. The feasibility study identified the parcel as worthy of consideration given its historic significance and its potential use as part of a larger Los Angeles River Parkway.[109] In the meantime, the non-profit Trust for Public Land was in the process of acquiring the property using an option agreement between the Trust, Majestic Realty, and their Limited Liability Corporation, known as River Station LLC.[110] Once the site was in the hands of the Trust, it was then purchased by the State of California using $33 million in Proposition 12 park bond funds.[111]

Also at this time, Senate Bill 1177 established the Cornfield Advisory Committee, an advisory group consisting of 36 members representing neighboring communities, business leaders, educators, historians, environmental justice and civil rights organizations, non-profits, and local, state and Federal governmental agencies. The Committee was charged with working with State Parks to create a vision for the park, formulate interim and permanent land uses, participate in public meetings, and make recommendations for the new park's name.[112] On December 21st, 2001, Governor Grey Davis visited the site to commemorate the state's purchase of the property.[113]

From 2002 to 2003, the California Department of Toxic Substances Control conducted soil remediation work at the River Station site to address issues of arsenic, lead, and petroleum hydrocarbons. Remediation included the removal of some 5,238 tons of contaminated soil, replaced by 4,850 tons of clean fill from the Gypsum Canyon Quarry

[104] *LASHP General Plan*, 2005, 27.
[105] *LASHP Cultural History Report*, 2011, 18. "Cornfield" was a nickname given to the lower freight yard by railroad workers, a reference to the corn that would fall off the train cars and sprout along the tracks.
[106] *LASHP General Plan*, 2005, 26-27.
[107] *LASHP Master Development Plan,* 2012, 9; *LASHP Cultural History Report*, 2011, 18.
[108] *LASHP Master Development Plan,* 2012, 9.
[109] *LASHP Cultural History Report*, 2011, 18.
[110] *LASHP General Plan*, 2005, 28.
[111] *LASHP General Plan*, 2005, 28; LASHP Interpretive Master Plan, 2006, 6.
[112] *LASHP Cultural History Report*, 2011, 18; LASHP Interpretive Master Plan, 2006, 6.
[113] *LASHP Master Development Plan,* 2012, 9.

in Anaheim.[114] During this process, preliminary archaeological surveys located and identified the remains of River Station.[115] In 2003, the Cornfield Advisory Committee completed a vision document for State Parks, proposing four themes to be interpreted in the new state park: connectivity, cultural/historical, recreation, and transportation.[116] Also that year, the new Chinatown L (Gold) Line Station opened just south of the River Station site, providing passenger access to the new Metro line that now traverses the northwestern portion of the River Station property.[117]

In 2005, the park site was leased to a local artist for a large-scale public art installation, entitled "Not a Cornfield." Designed by artist Lauren Bon, it was the result of negotiations between State Parks and the Annenberg Foundation, and consisted of plantings of corn and other vegetation. The installation necessitated the importation of 20,000 cubic yards of fill soils,[118] construction of a decomposed gravel perimeter road, excavation of utility lines and water lines, installation of an irrigation system, and landscaping primarily in the northeastern half of the park. The art piece was on display from March 2005 through early 2006, during which time normal public use of the park and work by State Parks staff were put on hold.[119] Also in 2005, Metro unearthed a 75-foot segment of the *Zanja Madre* brick conduit – located on what is now the Project Site – during the grading process for an access road and the laying of fiber optic cable.[120]

On June 10th, 2005, the California Parks and Recreation Commission approved the General Plan for the former River Station site, naming and classifying the property as "Los Angeles State Historic Park." The General Plan codified a vision and purpose, identifying the new park's unique opportunity to complement existing regional state historic parks, and giving direction for partnering with other institutions and organizations to interpret a more comprehensive history of the greater Los Angeles area.[121] In early 2006, State Parks staff began implementing the Interim Public Use Plan, which constructed public park facilities and landscape design elements that interpreted the site's history and archaeological features.[122] In September, some thirteen acres of

[114] LASHP Cultural History Report, 2011, 18.
[115] LASHP Master Development Plan, 2012, 9.
[116] LASHP Cultural History Report, 2011, 18.
[117] The Los Angeles County Metropolitan Transportation Authority ("Metro") installed a new rail line across the northern portion of the River Station site in 2002 as part of the Gold Line, a light rail line (now renamed as the L Line), which now connects downtown Los Angeles with Pasadena and points east.
[118] *LASHP Master Development Plan,* 2012, 10-11. According to the 2012 *Los Angeles State Historic Park Master Development Plan,* an estimated 60,000 cubic yards of imported fill soils were brought to the project site in 2005 and 2006 and placed on top of the existing ground surface in order to protect underlying historic archaeological remains from activities associated with the public art installation in 2005, and later, construction of the Interim Park Use Plan park facilities.
[119] LASHP Cultural History Report, 2011, 19.
[120] Zanja Madre National Register Nomination, prepared by Galvin Preservation Associates Inc., July 30, 2008. Today, this segment of the Zanja Madre is bounded on three sides by a poured-concrete retaining wall to protect it from potential landslides from the adjacent bluff.
[121] LASHP Interpretive Master Plan, 2006, 7.
[122] LASHP Cultural History Report, 2011, 19.

the site was officially opened for interim public use.[123]

In 2008, Phase 1 of the park's development was initiated, including preliminary design work by Hargreaves Associates, as well as archaeological reconnaissance and testing at the site.[124] A team of State Park scientists uncovered various remnant features and artifacts of the old River Station, including the foundation of the roundhouse; train turntable with massive redwood beams and stone center pivot; a brick-and-mortar repair pit foundation within the Machine Shop; a concrete support pier of unknown function; as well as tie-rods, bolts, and machine mounts. As part of the evaluation process, an architectural conservation plan for the treatment of extant historic features was completed.[125] However, in December 2008, the bond funding for Phase I development was frozen, and the project was halted. The project remained on hold until the bond funds were released in 2010, at which time State Parks resumed management of the project in-house with a reduced Phase 1 scope.[126] In between time, the park site was used for bus maintenance and storage.[127]

The Draft Environmental Impact Report for Phase 1 of the park's development was released for public review in 2012. The Draft EIR states that no evidence of pre-historic or historic remains pre-dating the River Station railroad yard had been discovered on the park site, likely due to its early agricultural use and its location within the historic floodplain of the Los Angeles River. The park site had no standing, intact historic-period buildings or structures, either from the 19th or early-20th centuries. Instead, the site primarily contained 19th-century masonry wall foundations and other structural remains (such as support piers, floor surfaces, and associated structures), as well as 20th-century items associated with the later railroad yard. By the time the Draft EIR was released, all buildings, structures, and tracks associated with the railroad yard had long since been removed.[128]

On March 15th, 2014, State Parks officially broke ground on a $20 million construction project to transform the former River Station site into a "world-class park." The project utilized Proposition 84 funds and installed new paths, picnic areas, wetlands, an elevated pedestrian walkway, an amphitheater, infrastructure improvements, parking lots, restrooms, a ranger station, and a welcome center.[129] What was to have been a one-year

[123] LASHP Master Development Plan, 2012, 9; "A Selected Chronology of Los Angeles State Historic Park (LASHP)." News Release. California Department of Parks and Recreation, September 9, 2008.
[124] LASHP Master Development Plan, 2012, 10.
[125] LASHP Master Development Plan, 2012, 10; "Excavations at Downtown's Los Angeles State Historic Park Uncover City's First Transcontinental Rail Artifacts – Revealing Clue to Industrial Past," News Release, California Department of Parks and Recreation, September 9, 2008.
[126] LASHP Master Development Plan, 2012, 10. What was originally a $55 million project was scaled back to $18 million due to state budget deficits.
[127] City of Los Angeles Department of Building and Safety, Online Building Records, http://ladbsdoc. lacity.org/idispublic/ (accessed December 2017).
[128] LASHP Master Development Plan, 2012, 10.
[129] "Los Angeles State Historic Park Begins Revitalization Construction Project," News Release, California Department of Parks and Recreation, March 14, 2014.

project lasted three years. Los Angeles State Historic Park finally opened to the public on April 22nd, 2017.

5.7 Conclusion

The development of Southern Pacific's first rail yards and depots on the Project Site and Park Site proved to be a major catalyst for Los Angeles' exponential growth over the next century. The civic victory in securing Los Angeles as the terminus of the southern transcontinental railroad at River Station resulted in the transformation of a regional agricultural center into a nationally-significant industrial hub in the late-19th and early-20th centuries. Thus, Los Angeles quickly leaped past its rivals in the development of what is today the world's third largest port, rail, and air transport centers. It was this transportation infrastructure that has allowed Los Angeles to become the international economic power it is today, and the Project Site and Park Site played a significant role in this meteoric transformation.[130]

5.8 Selected Chronology

Pre-History

3,500 BP	The Tongva occupy the area now encompassed by the Los Angeles basin, San Fernando Valley, San Gabriel Valley, San Bernardino Valley, and the local California coastline.

Spanish Colonial Period

1542	Explorers with Juan Rodriguez Cabrillo make the first documented European contact with the native Tongva people.
1769	The Portolá expedition passes through present-day downtown Los Angeles on August 2nd, encountering the native people from Yang-na.
	Fr. Juan Crespi names their camping spot near the river "El Pueblo de Nuestra Señora la Reina de los Ángeles del Río Porciúncula (translating as "town of our lady the Queen of Angels of the River Porciúncula.")
1771	Spanish colonists establish Mission San Gabriel, the fourth of California's Spanish missions.
1778	Governor Felipe de Neve receives approval for the creation of a civil pueblo to be named *La Reina de los Angeles* ("Queen of the Angels").

[130] LASHP Interpretive Master Plan, 2006, 10-11.

1781 *El Pueblo de Los Angeles* is officially founded under the Spanish Laws of the Indies on September 4th.

The *Zanja Madre,* the first irrigation ditch to convey water from the Los Angeles River to the pueblo, is constructed.

1797 San Fernando Mission is established, the seventeenth of the Spanish missions in California.

1800 The population of the Los Angeles pueblo is 315.

1804 Vineyards are established by Francisco Avila on the land now occupied by the Los Angeles State Historic Park.

1815 A large flood alters the course of the Los Angeles River, cutting a new main channel to the west.

1818 Flooding of the Los Angeles River forces the relocation of the plaza southwest to its current site.

The Avila Adobe is constructed by Don Francisco Avila; today it is the oldest existing residence in Los Angeles.

1820 The population of the Los Angeles pueblo is 650.

Mexican Period

1821 Mexico wins its independence from Spain and Alta California becomes a territory of the new Mexican Republic.

1822 The plaza church, *La Iglesia de Nuestra Señora La Reina de los Angeles* ("Church of Our Lady the Queen of the Angels), is dedicated on December 8th.

1825 Another flood drives the Los Angeles River back to the east.

1830 The population of the Los Angeles pueblo is 1,200.

1831 Abel Stearns erects a three-story flour mill north of the pueblo, powered by water from the *Zanja Madre*.

1834 The California Missions are secularized by the Mexican government, and mission lands are confiscated for distribution in large land grants called *ranchos*.

1835 The pueblo of Los Angeles is promoted to the rank of *ciudad* ("city") and made the territorial capital of Alta California.

American Period

1846 United States troops begin occupying Alta California.

1847 The United States gains control of Los Angeles.

1848 The signing of the Treaty of Guadalupe Hidalgo on February 2nd cedes the California territory to the United States and ends the Mexican-American War.

1849 Lt. Ord completes the first official land survey of Los Angeles.

1850 Los Angeles incorporates as an American city on April 4th.

California is admitted to the Union on September 9th as its 31st state.

The population of Los Angeles is 1,610.

1860 The population of Los Angeles is 4,385, nearly tripling in a decade.

1866 The neighborhood now known as Solano Canyon is first settled.

1870 Pico House, Los Angeles' the first three-story hotel, opens.

The Merced Theater, the city's first building designed expressly for theatrical purposes, opens.

The population of Los Angeles is 5,728.

Southern Pacific's "River Station"

1872 Southern Pacific Railroad Company offers to build a rail connection in Los Angeles, linking the city with the national rail network.

A site "far from the center of town" is chosen for the new Los Angeles Junction (a.k.a. "River Station").

1873 Southern Pacific starts laying tracks from Los Angeles Junction northbound toward San Francisco.

1875 “River Station” opens with a depot, a small freight house, and several shop buildings.

1876 Rail lines connect Los Angeles to the East Coast via the transcontinental railroad.

1879 The two-story Pacific Hotel opens for business next to the existing depot.

1880 Los Angeles’ population reaches 11,183, nearly doubling in ten years.

1881 The southern transcontinental route between Los Angeles and New Orleans is completed.

1882 One of the first telephones in Los Angeles is installed at River Station.

1883 A new depot and hotel with restaurant are constructed at River Station to accommodate the increased passenger traffic.

Herman Levi and Jacob Loew acquire and expand the old Stearns mill as the Capitol Milling Company.

1884 Fire House No. 1 opens on the plaza.

1885 The Santa Fe Railway arrives in Los Angeles, becoming its second national railroad line and sparking a rate war.

1886 Elysian Park is established; today it is the oldest and second largest park in the city.

1887 Southern Pacific brings 120,000 boomers to Los Angeles, the first electric streetcars begin running on L.A. streets, and $100 million in former rancho lands are sold.

1889 Southern Pacific opens the Arcade Depot, an ornate new passenger terminal, two miles south of River Station.

The Los Angeles Electric Railway Company extends trolley lines northward from downtown to River Station, and eastward across the Downey Street Bridge into Boyle Heights.

1890 The population of Los Angeles is 50,395.

1892 Oil is discovered near downtown, spurring a major oil boom.

1893 The Fruit Growers Exchange is founded and partners with railroads in promoting local citrus.

1894 The Semi-Tropic Homestead Company develops a housing tract near River Station and builds a pedestrian bridge over the rail yard to provide access from Buena Vista Street (now Broadway).

1897 The River Station freight yards are extended another 1,500 feet down Alameda Street where several massive shipping houses are constructed.

1899 In October, the "Freight Depot Tract" is recorded with the County of Los Angeles, including the River Station and Capitol Milling Co. sites.

1900 The population of Los Angeles exceeds 100,000.

1902 The River Station Depot and Pacific Hotel are removed from their original site and incorporated into a new, larger freight house at the south end of the property.

1904 All shop activities are moved from River Station to the new General Shops Yard across the river in Lincoln Heights; the turntable, roundhouse, and maintenance shops are dismantled and reconstructed at the new site.

The City abandons the *zanja* system.

1905 City voters approve a bond to build the Los Angeles Aqueduct.

A third major railroad – the Los Angeles, San Pedro & Salt Lake Railway (now Union Pacific) – arrives in Los Angeles.

1908 The City zones the area around River Station as Industrial District No. 1.

1909 The Buena Vista Street Viaduct (now called the North Broadway-Buena Vista Bridge) opens, the first monumental bridge across the Los Angeles River.

1910 The North Main Street Bridge opens, connecting downtown to East Los Angeles.

1913 The Los Angeles Aqueduct is completed, providing Los Angeles with a reliable source of water from the Owens River.

1914 Southern Pacific opens the Central Railroad Station at the northwest corner of 5th Street and Central Avenue.

Southern Pacific closes Arcade Station.

The City completes new port facilities at San Pedro to benefit from the completion of Panama Canal.

1917 Italian immigrant Santo Cambianica opens the San Antonio Winery near the Los Angeles River.

1920 The population of Southern California surpasses that of Northern California.

The population of Los Angeles approaches 600,000.

1923 Cathedral High School, one of the city's oldest Catholic high schools, is established across Broadway from River Station.

1925 Southern Pacific transfers supervision of its freight operations to Taylor Yard, making River Station an adjunct facility.

1928 Los Angeles City Hall opens on North Spring Street.

1929 San Pedro becomes the nation's leading harbor.

1930 *El Pueblo de Los Angeles* is rebranded as *Paseo de Los Angeles* (commonly known as "Olvera Street"), a popular tourist destination.

The population of Los Angeles exceeds 1.2 million, making it the fifth largest city in the nation.

1933 "Old Chinatown" is chosen as the site for the new Union Station; residents and businesses are forcibly removed.

1935 River Station becomes the key station for Southern Pacific's daily "Overnight" *Coast Merchandise Express* freight trains to San Francisco and Portland.

1938 The U.S. Army Corps of Engineers begins the channelization of the Los Angeles River.

"New Chinatown" is established north of downtown, in an area then known as "Sonoratown."

1939 Union Station opens on May 3rd with a festive three-day celebration.

1940 The six-mile Arroyo Seco Parkway is completed, making it the first modern "freeway."

The population of Los Angeles exceeds 1.5 million.

1942 The William Mead Homes public housing project opens several blocks east of River Station.

1946 The Los Angeles Department of Water & Power builds the Main Street Station between River Station and the L.A. River channel.

St. Peter's Catholic Church, established in 1904 by Los Angeles' earliest Italian immigrants, erect a new sanctuary on North Broadway, immediately across from River Station.

1950 The City begins to evict 1,000 families in Chavez Ravine to build a Federally-subsidized public housing project.

The State demolishes part of the historic *El Pueblo* area for the Hollywood/Santa Ana Freeway.

The population of Los Angeles approaches 2 million.

1953 The State dedicates the historic *El Pueblo* area as a historic monument, including the Plaza, Avila Adobe, Merced Theatre, Masonic Temple, Garnier Building, Fire House No. 1, and Pico House.

Southern Pacific initiates some of the first "trailer-on-flat car" (TOFC) container service at River Station.

1960 The population of Los Angeles approaches 2.5 million.

1961 Construction of Dodger Stadium begins at Chavez Ravine.

1970 The population of Los Angeles exceeds 2.8 million.

1971 Los Angeles' Cultural Heritage Board designates the River Station area as Historic-Cultural Monument No. 82.

1978 Fire destroys the 1902 freight house, a portion of which was the original Pacific Hotel.

1984 Southern Pacific formally renames River Station the "Spring Street Intermodal Center."

1985 Taylor Yard closes.

Louis McAdams founds *Friends of the Los Angeles River* (FoLAR), calling for the restoration of the channelized riverbed.

1990 The population of Los Angeles approaches 3.5 million.

1992 On October 1st, Southern Pacific ceases all rail activities at River Station.

1999 Majestic Realty unveils a proposal to re-develop the River Station site as a large warehouse and manufacturing complex.

2000 The *Chinatown Yards Alliance for the Cornfield* forms to oppose the Majestic project.

2001 The *Chinatown Yards Alliance* successfully sues to stop the Majestic project.

The State of California purchases the River Station site for $33 million.

Senate Bill 1177 establishes the *Cornfield Advisory Committee* to help create a vision for the park.

2002 Soil remediation work begins at the River Station site; the remains of River Station are located in the process.

Metro installs a new light-rail line across the northern portion of the River Station site, to become part of the A (Gold) Line.

2003 The new Chinatown Gold Line Station opens just south of the River Station site.

2005 The River Station site is leased to artist Lauren Bon for the "Not a Cornfield" art installation.

On June 10th, the State Parks Commission officially re-names the River Station site "Los Angeles State Historic Park."

A 75-foot segment of the *Zanja Madre* brick conduit is unearthed on the Project Site.

2006 Thirteen acres of the State Park site is officially opened for interim public use.

2008 Phase 1 development of the park begins, but is soon halted when bond funds are frozen.

2010 Bond funds are released and Phase 1 development resumes with a reduced scope.

2014 On March 15th, State Parks breaks ground on a $20 million construction project to transform the River Station site into a world-class park.

2017 Los Angeles State Historic Park opens to the public on April 22nd.

6.0 SITE DEVELOPMENT HISTORY

The following table outlines the development of the Project Site over time, as determined through a review of various primary and secondary sources, including published histories, building permits, historic photographs and maps.

1872 The property selected for the new Southern Pacific rail depot and yard coincides with what is now the middle portions of the Los Angeles State Historic Park and the Project Site.

1873 Arcadia Bandini de Stearns donates the first parcel of the future rail yard property to Southern Pacific.

1875 Southern Pacific's River Station is under construction at what is now the site of the Los Angeles State Historic Park and the Project Site. Initial development includes a depot, a small freight house, and several shop buildings. Continuing to expand after its initial opening, River Station eventually consisting of a roundhouse with turntable, freight house, blacksmith shop, machine shop, transfer table, car shop, paint shop, coal dock, and other facilities. It appears these features are constructed on what is now the park site. It is unclear if there is any rail-related development on the Project Site at this time.

1885 Southern Pacific purchases what is now the northern portion of the Park Site and Project Site and continues to expand its facilities. By the mid-1880s, River Station includes a 26-stall roundhouse with turntable, coaling and wood house, full set of maintenance shops, and a large icing facility on the expanded property. It appears these features are constructed on what is now the Park Site. It is unclear if there is any rail-related development on the Project Site this time.

1888 Per Sanborn maps, the southernmost portion of the Project Site contains isolated development, including some railroad tracks, a 1-story storage building, and two smaller 1-story buildings (use not legible).

1894 Per Sanborn maps, the southernmost portion of the Project Site contains some railroad tracks, but the three small buildings are no longer present. There is additional development further north on the Project Site above the bluff, including a 1-story dwelling (1054);[131] and a cluster of five dwellings, two small store buildings, and a Southern Pacific tenement building, presumably housing for railroad workers (1356-1364 ½).[132]

1899 In October, the "Freight Depot Tract" is recorded with the County of Los Angeles, comprising the entirety of the River Station site (including what is now the Park Site and the Project Site) as Lot A of APN 5414-016-903. This tract incorporates two previous smaller tracts: Wilson's Buena Vista Street Tract (1896) and Jose Saveriano Ybarra Tract (1884).

1906 Per Sanborn maps, the southernmost portion of the Project Site contains some railroad tracks, a 1-story railroad carpentry shop, two small 1-story offices, and a water tank (elevated 12 feet). The dwelling at 1054 Buena Vista Street (now Broadway, Feature #10) is still present. Immediately north of the dwelling are two 50,000-gallon water tanks (elevated 20 feet) with a plant for purifying water, and a Southern Pacific pumping station (well and pump). Further north on the Project Site, along Buena Vista, are a 2-flat residence (1324), a dwelling (1326), a small oil tank (top level with ground), a large 30,000-gallon oil tank (on ground), a small vacant building, and a small tool house.

[131] Feature #10 (Footings) may be remnants of this dwelling.
[132] Feature #21 (Foundation C) may be a remnant of these structures.

1950 Per Sanborn maps, the southernmost portion of the Project Site contains a railroad carpentry shop, lumber storage building, sign painting building, auto repair building, steel storage building, office, and various other attached 1-story shop buildings (1251-1257). Some of these appear to be complete structures, while others may be open shelters. Further north on the Project Site, along Buena Vista, are a wholesale seafood business (1040-1046),[133] and a small restaurant building (1050).[134] Two old rail cars are used for storage. The dwelling at 1054 Buena Vista Street is gone.[135] The two elevated 50,000-gallon water tanks, plant for purifying water, and pumping station are also gone.[136] The Project Site also contains a 1-story gas/oil building (1322), and a 1-story store building (1340). The small oil tank is present. The large oil tank is gone.

1952 Per historic aerial photographs of the Project Site, none of the currently extant buildings are present at this time.

1953 Per building permit LA59547 (June 2, 1953), a new garage building is constructed by the Southern Pacific Railroad Co., designed by architect W.F. Meaney. The building is described as "prop garage," 1-story, steel construction, measuring 40'x160'.[137]

Per building permit LA59548 (June 2, 1953), a new building is constructed by the Southern Pacific Railroad Co., designed by architect W.F. Meaney. The building is described as a "prop wash rack," 1-story, steel construction, measuring 40'x40'.[138]

1956 Per building permit LA54587 (October 3, 1956), a foundation is constructed for a new prop signal shop and garage, to be built by the Southern Pacific Railroad Co., designed by architect F.A. Knudtson. The proposed building for which the foundation is constructed is described as 1-story, measuring 40'x200'. This building appears to be on the Project Site, north of the SPRR Auto Repair Garage.

[133] Feature #8 (Foundation A) is a remnant of this building.
[134] Feature #9 (Foundation B) is a remnant of this building.
[135] Feature #10 (Footings) may be remnants of this dwelling.
[136] Feature #12 (Round tank) may be a later replacement for these two elevated tanks.
[137] This structure is the southernmost portion of the SPRR Auto Repair Garage (Feature #3).
[138] This structure will be subsequently incorporated into an expanded SPRR Auto Repair Garage (Feature #3).

Per building permit LA56505 (October 29, 1956), a new building is constructed by the Southern Pacific Railroad Co., designed by architect F.A. Knudtson. The building is described as a "signal and electric railroad shop," 1-story, steel construction, measuring 40'x200'. This building appears to be on the Project Site, north of the SPRR Auto Repair Garage.

1957 Per building permit LA83675 (July 31, 1957), a 40'x20' addition is constructed by the Southern Pacific Railroad Co., designed by architect W.F. Meaney. The addition links the existing 40'x160' garage building and the adjacent 40'x40' wash rack building, combining the three structures into a single building, described as an "auto repair shop," measuring 40'x 220'.[139]

1958 Per building permit LA94374 (February 28, 1958), a 40'x60' addition is constructed by the Southern Pacific Railroad Co. The addition is situated at the northern end of the existing 40'x220' building, described as a "car repair shop," expanding the structure to 40'x 280'.[140]

Per building permit LA98587 (April 22, 1958), a 40'x40' addition is constructed by the Southern Pacific Railroad Co. The addition is situated at the northern end of the existing 40'x280' building, described as a "motor car repair shop," expanding the structure to 40'x 320'. [141]

1960 Per the Los Angeles County Tax Assessor, an improvement of 12,840 square feet is erected.[142]

1964 Aerial images of the Project Site show a very long, rectangular building with a side-gable roof.[143] This building does not appear in a previous historic aerial image from 1952. Conversely, the wholesale seafood business (1040-46) which appears in a previous aerial image from 1952, is no longer present in this aerial, but a concrete foundation remains.[144]

[139] This is Feature #3 (SPRR Auto Repair Garage).
[140] This is Feature #3 (SPRR Auto Repair Garage).
[141] This is Feature #3 (SPRR Auto Repair Garage).
[142] This appears to refer to Feature #3 (SPRR Auto Repair Garage).
[143] This appears to be Feature #3 (SPRR Auto Repair Garage).
[144] This is Feature #8 (Foundation A).

1992 On October 1st, Southern Pacific ceases all rail activities at the River Station facility. Soon, any remaining structures are dismantled and the property is closed. It is unclear what buildings or structures may have been removed from the Project Site at this time.

1994 Aerial images of the Project Site show a very long, rectangular building with a side-gable roof.[145] The 40'x200' garage building to the north of the SPRR Auto Repair Garage is also still present at this time.

1998 Per building permit 98LA79927 (October 13, 1998), a 40'x200' auto repair garage is demolished. This appears to be the garage building on the Project Site north of the SPRR Auto Repair Garage.

2002 From 2002 to 2003, the California Department of Toxic Substances Control conducts soil remediation work at the River Station site to address issues of arsenic, lead, and petroleum hydrocarbons. Remediation includes the removal of some 5,238 tons of contaminated soil, replaced by 4,850 tons of clean fill. During this process, preliminary archaeological surveys locate and identified the remains of River Station. It is unclear if the soil remediation work extends onto the Project Site. It is unknown if any archaeological survey work is conducted on the Project Site at this time.

The Los Angeles County Metropolitan Transportation Authority (Metro) constructs a new light-rail line across the northern portion of the River Station site, to become part of the Metro A Line. This is likely the point at which the Project Site is subdivided from the rest of the River Station site.

2003 Aerial images of the Project Site show a very long, rectangular building with a side-gable roof.[146] The 40'x200' garage building to the north of the SPRR Auto Repair Garage is no longer present.

2004 A 2004 L.A. County Tax Assessor map shows a narrow Los Angeles County Metropolitan Transportation Authority easement across the northern portion of the River Station site, coinciding with the later location of the Metro A Line right-of-way. This easement appears to define the southern boundary of the Project Site, separating it from the rest of the River Station site.

[145] This appears to be Feature #3 (SPRR Auto Repair Garage).
[146] This appears to be Feature #3 (SPRR Auto Repair Garage).

A 2004 study for the Metro A Line describes the area between the Metro's north fence and North Broadway as private property. This is the Project Site. On this property, the study identifies three segments of exposed brick conduit, and suggests that their locations in the hillside below Broadway seem to indicate that the brick conduit may continue in the remainder of the undisturbed bluff just above grade. The study also notes that these segments are on approach to the Capitol Milling building (immediately south of the Project Site), where historic sources have reported the presence of brick conduit zanja by the mid-1850s and perhaps much earlier. The open Zanja Madre is described as having run along the base of the bluff below North Broadway, but excavation has not revealed any evidence of the original open zanja. It is unclear if this area is on the Project Site or the Metro A Line property, or both.

2005 A 75-foot segment of brick conduit was unearthed during the grading process for an access road and installation of fiber optic cable. This partially exposed segment is situated adjacent to the Project Site, in the Metro A Line right-of-way.[147]

2008 Per building permit 2008LA32586 (December 17, 2008), a 10'x10' trash enclosure and a 16'x35' propane enclosure are constructed on the Project Site. According to the attached plot plan, these enclosures are constructed in the vicinity of the SPRR Auto Repair Garage; however, their precise locations are unclear. Also, the plot plan depicts an additional building in two parts.[148]

2009 Per the Los Angeles County Tax Assessor, an improvement of 1,586 square feet is erected.[149]

Aerial images of the Project Site show two extant buildings.[150] These buildings do not appear in a previous historic aerial image from 2005.

Per building permit 2009LA35847 (March 27, 2009), a new modular office building is constructed in two parts, measuring 72'x60' and 12'x60'.[151]

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[147] The Zanja Madre is addressed in detail in the Cultural Resource Evaluation and Impact Assessment for the Buena Vista Project. As such, this feature is not evaluated in this report, and potential impacts of the Project to this feature are not analyzed herein.

[148] This appears to be Feature #1 (Wayside Communications Office).

[149] This appears to be Feature #2 (Vehicle Shelter).

[150] These are Features #2 (Vehicle Shelter) and #3 (SPRR Auto Repair Garage).

[151] According to the plot plan attached to this permit, this is the Wayside Communications Office (Feature #1). The plot plan also depicts the Vehicle Shelter (Feature #2).

2010 Per the Los Angeles County Tax Assessor, an improvement of 4,200 square feet is erected.[152]

Per the Los Angeles County Tax Assessor, an improvement of 720 square feet is erected.[153]

[152] This appears to refer to the larger portion of Wayside Communications Office (Feature #1).
[153] This appears to refer to the smaller portion of Wayside Communications Office (Feature #1).

7.0 IDENTIFICATION OF HISTORICAL RESOURCES

7.1 Historical Resources on the Project Site

PREVIOUS EVALUATIONS

"River Station"

On June 16, 1971, the Cultural Heritage Board of the City of Los Angeles designated the "River Station Area/Southern Pacific Railroad" as Historic-Cultural Monument No. 82.[154] The property boundary is described as "between North Broadway on the West, North Spring Street on the East, Northward to the Los Angeles River and the Southeasterly corner of Elysian Park, Southward to Capitol Milling Company building."[155] This boundary comprises the current sites of the Los Angeles State Historic Park, the Metro A Line right-of-way, and the Project Site, collectively.

At the time of designation, the River Station site was said to retain many vestiges of 19th-century railroading: "The freight yards, warehouses, tracks, switch houses, docks and cobblestone pavement may still be seen in their original setting."[156] Nevertheless, according to Cultural Heritage Board meeting minutes from June 16, 1971, the Board "unanimously agreed that recognition of the River Station Area would exclude any structures located therein."[157] This fact was noted in 1998 when Jay Oren gave a staff report that recommended allowing the demolition of a 1958 car and auto repair shop measuring 40x200 feet, stating that "the Historic-Cultural Monument declaration for this property specifically excluded any structures."[158] Similarly, a staff report by Jay Oren dated April 6, 1999 reiterates that when the River Station site was designated in 1971, "structures were specifically omitted form the nomination."[159]

In 1999, a preliminary historic assessment prepared by Teresa Grimes Historic Preservation outlines changes to the River Station site since its designation. In a letter to William Delvac of Latham & Watkins dated March 23, 1999, Grimes notes that "although the area was designated a Los Angeles Historic-Cultural Monument in 1971, it has since lost its physical integrity. The most important building on the site in 1971 was the 'Southern Pacific Office and Freight House A.' Approximately 20 feet wide and nearly 400 feet long, the building visually dominated the site from the 1880s until it was destroyed by fire in 1978. Due to its lack of integrity, the site is not eligible for listing in the California Register or the National Register." Grimes continues, "The historic resource which existed at the time of the Monument designation in 1971 has for all intents and purposes been destroyed. Even if one still considers the site an historic

[154] Notice by Carl S. Dentzel, Cultural Heritage Board, July 23, 1971.
[155] Notice by Carl S. Dentzel, July 23, 1971; Letter by Kenneth Ross, Cultural Heritage Board, July 22, 1971.
[156] Notice by Carl S. Dentzel, July 23, 1971.
[157] Meeting minutes, Cultural Heritage Board, June 16, 1971.
[158] Meeting minutes, Cultural Heritage Commission, October 7, 1998.
[159] Staff Report by Jay Oren to the Cultural Heritage Commission, April 6, 1999.

resource for the purposes of CEQA based upon the Monument designation, new construction would not necessarily cause a 'substantial adverse change,' the measure used in determining whether or not a project may cause potential impacts."[160]

Since this time, as described above, the River Station site, including the Project Site, has undergone even more change, most notably with the dedication of the Metro A Line right-of-way in 2002, and the creation of the Los Angeles State Historic Park in phases between 2001 and 2017. Despite these changes over time, the boundary of the Historic-Cultural Monument was not revised. Thus, while the entirety of the River Station site (including the Project Site) is a designated Historic-Cultural Monument, its significance appears to be as the site of important activities, and not for its association with any specific physical features. Nevertheless, for the purpose of this environmental review, the Project Site is considered a historical resource under CEQA.

CURRENT INVESTIGATION ON THE PROJECT SITE

In addition to the previously identified historical resource noted above, this report evaluated all extant features currently evident on the Project Site to determine if there are any additional historical resources present. The vast majority of these features were eliminated from consideration as potential historical resources due to age, lack of historic association, and/or as remnants of buildings or structures that are no longer extant.

One notable exception to this pattern is the SPRR Auto Repair Garage (Feature #3). As described in section 4.1 of this report, this building was constructed in phases between 1953 and 1958, and is therefore over 50 years of age. It has a direct association with River Station, as it was built by the Southern Pacific Railroad as an auto repair garage and wash rack. This building occupies its original site at what was the southern end of the River Station rail yard. Additionally, it appears to have good integrity from its period of construction, displaying a long rectangular plan, metal interior framing, corrugated roof and wall cladding, steel-sash industrial windows, a series of vehicular bays with metal doors along the east façade, and an open north façade.

However, with further analysis, it was determined that the SPRR Auto Repair Garage is not eligible as an individual historic resource because, on its own, it is unable to convey its historic association with River Station. The building sits in isolation on what was historically a peripheral portion of the rail yard and has since been separated from the vast majority of the River Station site by the Metro A Line right-of-way. Additionally, this building is a utilitarian garage designed for the repair and maintenance of motor vehicles, and thus is not readily identifiable as a railroad building type. Also, it dates from the later period of River Station, which had its heyday in the late-19th and early-20th centuries. For all of these reasons, the historical relationship between this building

[160] Letter by Teresa Grimes, Teresa Grimes Historic Preservation, to William Delvac, Latham & Watkins, March 23, 1999.

and River Station more broadly is no longer apparent. As such, the SPRR Auto Repair Garage does not convey its historic significance and therefore is not eligible as an individual historic resource.

(For the historic status of all extant features on the Project Site, see Table 7, below.)

TABLE 7. Historic Status of Extant Features on the Project Site

Map No.	Feature Name	Year Built	Evaluation	Historical Resource
1	Wayside Communications Office[161]	2009	Not significant. Less than 50 years old and not of exceptional importance.	No
2	Vehicle shelter	2009	Not significant. Less than 50 years old and not of exceptional importance.	No
3	Southern Pacific Railroad (SPRR) Auto Repair Garage	1953-1958	Due to its age and direct association with the Southern Pacific Railroad, this building may have some historic significance. However, it does not appear to be sufficiently important to be eligible as an individual resource.	No
4	Golden Dragon Restaurant Rear Addition	1946 (original building), 1955 (rear addition on Project Site)	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
5	Foundation remnants	Unknown	Not significant. Remnant feature. No information suggesting any important historic associations.	No
6	Parking structure landing	c.1990	Not significant. Less than 50 years old and not of exceptional importance.	No
7	Billboard A	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
8	Foundation A	1949	Not significant. Remnant feature. No information suggesting any important historic associations.	No
9	Foundation B	Pre-1950	Not significant. Remnant feature. No information suggesting any important historic associations.	No

[161] When this Project was initiated, this feature was present on the Project Site, and it remained extant as of the site visit on February 27, 2018. This structure has since been removed and is no longer extant on the Project Site as of the site visit on October 15, 2021.

Map No.	Feature Name	Year Built	Evaluation	Historical Resource
10	Footings	c.1894	Not significant. Remnant feature. No information suggesting any important historic associations.	No
11	Square pit	Unknown	Not significant. Remnant feature. No information suggesting any important historic associations.	No
12	Round tank	Unknown	Due to its possible association with the Southern Pacific Railroad, this feature may have some historic significance. However, it does not appear to be sufficiently important to be eligible as an individual resource.	No
13	Billboard B	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
14	Billboard C	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
15	Billboard D	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
16	Billboard E	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
17	Guardrail[162]	Unknown (appears to be early 20th century)	Due to its apparent age and possible association with the Southern Pacific Railroad, this feature may have some historic significance. However, it does not appear to be sufficiently important to be eligible as an individual resource.	No
18	Billboard F	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No

[162] This guardrail is situated at the sidewalk, along the current property line of the Project Site. For purposes of environmental review, this feature is presumed to be located on the Project Site as part of a three-foot dedication in this area.

Map No.	Feature Name	Year Built	Evaluation	Historical Resource
19	Billboard G	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
20	Foundation C	Unknown	Remnant feature. Due to its possible association with the Southern Pacific Railroad, this feature may have some historic significance. However, it does not appear to be sufficiently important to be eligible as an individual resource.	No
21	Billboard H	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
22	Billboard I	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
23	Billboard J	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
24	Billboard K	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
25	Billboard L	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
26	Billboard M	Unknown	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No

SUMMARY OF HISTORICAL RESOURCES ON THE PROJECT SITE

Based upon the evaluations above, the Project Site contains one historical resource for the purposes of CEQA:

- River Station Area/Southern Pacific Railroad (LA-HCM No. 82)

7.2 Historical Resources in the Expanded Study Area

PREVIOUS EVALUATIONS

"Zanja Madre"

In 2008, a National Register nomination was prepared by Galvin Preservation Associates, Inc. and submitted to the California Office of Historic Preservation (OHP), proposing that the 75-foot exposed segment of the Zanja Madre adjacent to the Project Site be listed in the National Register as an individual resource. The nomination identified the Zanja Madre as a "structure" eligible under National Register Criterion A for association with "events that have made a significant contribution to the broad patterns of our history." The nomination defined the period of significance a 1781 to 1904, with this segment likely constructed sometime between 1884 and 1888.[163]

However, this nomination was declined by OHP. In a letter dated June 4, 2009, Cynthia Toffelmier states that the nomination "does not discuss how this small segment of the extensive water conveyance system conveys the Zanja's Madre's significance for important associations with the development of Los Angeles…It is possible for a segment of a larger resource to meet eligibility requirements if it can be documented to be a rare surviving element of the larger system. In this case, the nomination must establish the segment as the only or best surviving element of the system and demonstrate that the segment retains the essential physical features necessary to convey historic character of the resource."164 The Zanja Madre is listed in the California Historic Resources Inventory (HRI) with a status code a 7W (Submitted to OHP for action, withdrawn).[165]

SurveyLA

The area around the Project Site has been surveyed, evaluated, and documented many times over the years for the purpose of identifying historical resources. Most recently, this area was examined by SurveyLA, Los Angeles' citywide historical resources survey.[166] The following table lists previously identified historical resources located within the Expanded Study Area *(see Table 8, below)*.

[163] Zanja Madre National Register of Historic Places Registration Form, prepared by Galvin Preservation Associates, Inc., July 30, 2008.

[164] Letter by Cynthia Toffelmier, California Office of Historic Preservation, in response to the Zanja Madre National Register Nomination, June 4, 2009.

[165] The Zanja Madre is addressed in detail in the Cultural Resource Evaluation and Impact Assessment for the Buena Vista Project. As such, this feature is not evaluated in this report, and potential impacts of the Project to this feature are not analyzed herein.

[166] The majority of the Expanded Study Area is located within the Central City North Community Plan Area, surveyed by SurveyLA in 2016. The remainder of the Expanded Study Area is situated within the Silver Lake-Echo Park-Elysian Valley CPA, surveyed by SurveyLA in 2014.

TABLE 8. Previously Identified Historical Resources in the Expanded Study Area

Address	Name	Year Built	Previous Evaluation
1253 N Bishops Rd	Cathedral High School	1930, 1949, 1960	Listed in the HRI with status code 2S2 (1994)[167] Designated LA- HCM #281 (1984)
957 N Broadway	Bing Kong Tong Society of Los Angeles; Chinese Free Masons	1949	Identified by SurveyLA with status codes 3S, 3CS, 5S3 (2016)
969 N Broadway	Phoenix Bakery	1977	Identified by SurveyLA with status code 5S3 (2016)
989 N Broadway	Lung Kong Tin Yee Association	1949	Identified by SurveyLA with status codes 3S, 3CS, 5S3 (2016)
993 N Broadway	Soo Yuen Fraternal Association	1949	Identified by SurveyLA with status codes 3S, 3CS, 5S3 (2016)
1001 N Broadway		1951	Identified by SurveyLA with status codes 3S, 3CS, 5S3 (2016)
1031 N Broadway		1890, 1926	Identified by SurveyLA with status codes 3S, 3CS, 5S3 (2016)
1041 N Broadway	St. Peter's Italian Catholic Church (property includes "The Immigrants" Sculpture")	1946 (church), 1971 (sculpture)	Identified by SurveyLA with status codes 3CS, 5S3 (church) and QQQ[168] (sculpture) (2016)
1045 N Broadway	Casa Italiana (property includes the "Replica of Lupa Capitolina Statue")	1972 (casa), 1930 (statue)	Identified by SurveyLA with status codes 3CS, 5S3 (casa) and QQQ (statue) (2016)
1327 N Broadway		1885	Identified by SurveyLA with status a code QQQ (stone retaining wall only) (2016)
1231 N Spring St	Capitol Milling Company, Stearns Mill, Eagle Mills	1883	Listed in the HRI with status code 2S2 (1986)
1245 N Spring St	River Station (now Los Angeles State Historic Park)	1875 (rail yard), 2017 (LASHP)	Designated LA- HCM #82 (1971)

[167] Status code 2S2 indicates "Individual property determined eligible for the National Register by a consensus through Section 106 process; listed in the California Register."

[168] In SurveyLA, status code QQQ is used to flag properties that research suggests may be historically significant, but the evaluation could not be completed within the parameters of SurveyLA methodology. The most common reasons an evaluation could not be completed under SurveyLA are (1) More research is needed to determine or confirm historic significance, or (2) The property is not visible from the public right-of-way and therefore integrity could not be assessed. The assignment of a QQQ to a property in SurveyLA is evidence of significance. Therefore, for the purpose of this environmental review, a property with a SurveyLA status code QQQ is considered a historical resource.

Address	Name	Year Built	Previous Evaluation
Boundaries defined as Bamboo Lane to the north, Lei Min Way to the south, Broadway to the east, and Hill Street to the West	East of Hill Street Chinatown District[169]	1937-1945	Determined eligible for the National Register by consensus in 1982.[170] Listed in the California Register.
	Elysian Park (portion)	1886	Identified by SurveyLA with status codes 3S, 3CS, 5S3 (2014)
	Buena Vista Street Viaduct (now called the North Broadway Bridge)	1909-1911	Listed in the HRI with status code 2S2 (1986) Designated LA- HCM #907 (2008)

CURRENT INVESTIGATION OF THE EXPANDED STUDY AREA

In addition to the previously identified historical resources noted in the table above, this report evaluated all properties within the Expanded Study Area to determine if there are any additional historical resources present *(see Table 9, below)*.

TABLE 9. Historic Status of Additional Properties in the Expanded Study Area

Address	Name	Year Built	Evaluation	Treated as Historical Resource
950 N Broadway	Shiseido	1947, 1981	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
960 N Broadway	Golden Dragon Restaurant	1946	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
977 N Broadway	Far East National Bank	1983	Not significant. Less than 50 years old and not of exceptional importance.	No

[169] A "Chinatown Commercial Historic District" was also identified by SurveyLA in 2016. It is included in the Chinatown District listed in the California Register in 1983.

[170] The Community Redevelopment Agency of the City of Los Angeles, "Determination of Eligibility: Chinatown," prepared by Roger G. Hatheway and Associates, August 1982.

Address	Name	Year Built	Evaluation	Treated as Historical Resource
978 N Broadway	Mandarin Plaza and parking structure	1972	Not significant. Less than 50 years old and not of exceptional importance.	No
999 N Broadway	Royal Pagoda Motel	1964	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
1011 N Broadway		1962	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
1029 N Broadway		1955	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
1039 N Broadway		1972	Not significant. Less than 50 years old and not of exceptional importance.	No
1201 N Broadway		1924	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
1217-1221 N Broadway	(parking lot)	N/A	N/A	No
1231 N Broadway	Li Hing of Hong Kong, Inc.	1934	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No

Address	Name	Year Built	Evaluation	Treated as Historical Resource
1301 N Broadway		1960	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
1305 N Broadway	Xuan Wu San Charity	2002	Not significant. Less than 50 years old and not of exceptional importance.	No
1311 N Broadway		1989	Not significant. Less than 50 years old and not of exceptional importance.	No
1319 N Broadway		1920	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
1323 N Broadway		1922	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
1335 N Broadway		1884	The residence may be significant as a rare remaining example of late-19th century residential development in this area; however, it does not retain sufficient integrity to convey this significance.	No
1349 N Broadway	Quan Yum Temple	1983	Not significant. Less than 50 years old and not of exceptional importance.	No
1357 N Broadway	(parking lot)	N/A	N/A	No
1373 N Broadway	Norton Electric Wholesale	1922	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No

Address	Name	Year Built	Evaluation	Treated as Historical Resource
1401 N Broadway	Cordoba Corporation	1920	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
1411 N Broadway		1924	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
1415 N Broadway		2011	Not significant. Less than 50 years old and not of exceptional importance.	No
1417 N Broadway		1959	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
1421 N Broadway		1902	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
1425 N Broadway		1952	Not significant. Not an excellent example of a building type, architectural style, or work of a master. No information suggesting any important historic associations.	No
1501-1511 N Broadway	(vacant lot)	N/A	N/A	No
433 W Casanova St	Casanova Garden Apartments	1998	Not significant. Less than 50 years old and not of exceptional importance.	No

SUMMARY OF HISTORICAL RESOURCES IN THE EXPANDED STUDY AREA

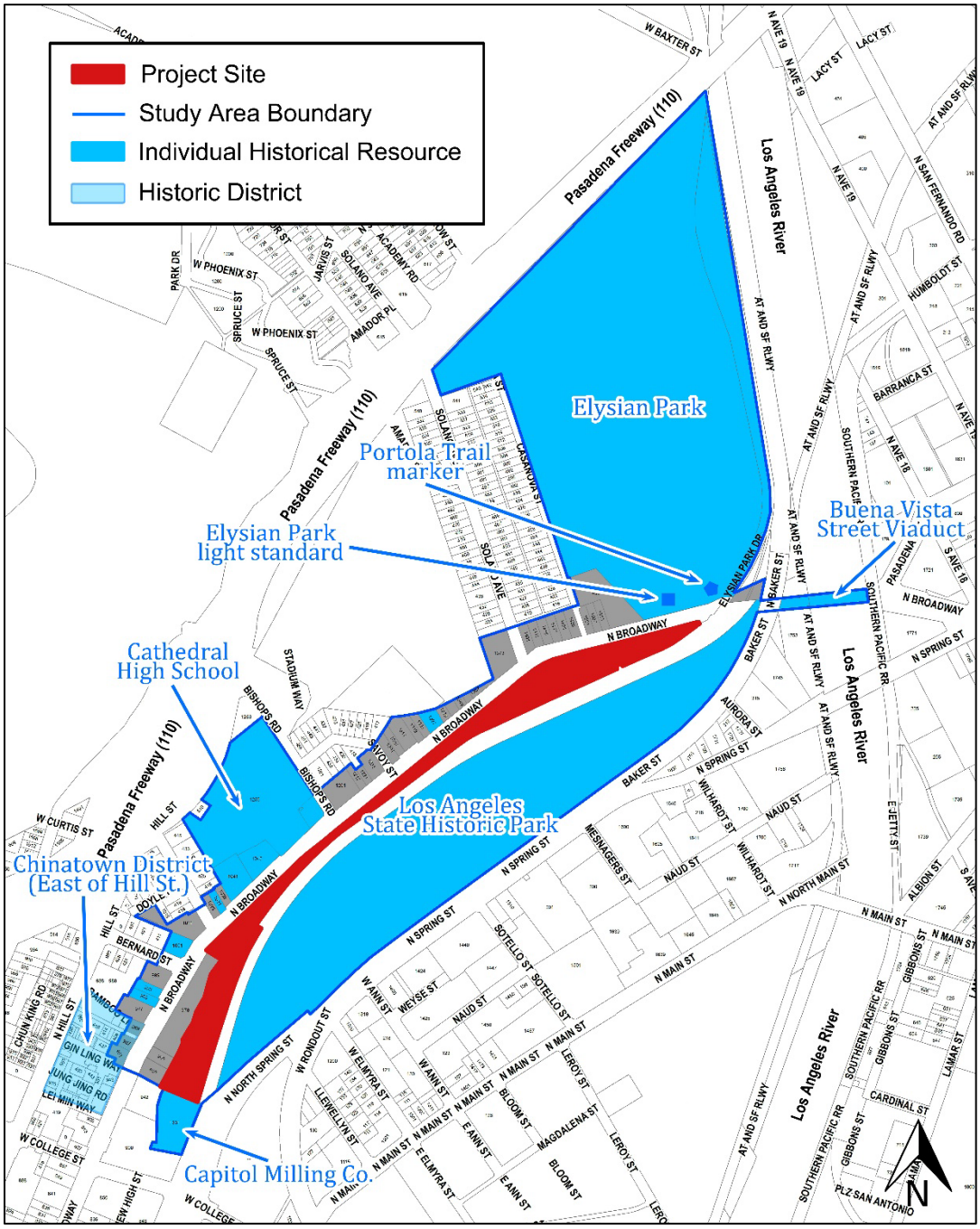
Based upon the evaluations above, the Expanded Study Area contains fifteen (15) properties that are considered historical resources for the purposes of CEQA:

- 1253 N Bishops Rd, Cathedral High School
- East of Hill Street Chinatown District[171]
- 957 N Broadway, Bing Kong Tong Society of Los Angeles; Chinese Free Masons
- 969 N Broadway, Phoenix Bakery
- 989 N Broadway, Lung Kong Tin Yee Association
- 993 N Broadway, Soo Yuen Fraternal Association
- 1001 N Broadway
- 1031 N Broadway
- 1041 N Broadway, St. Peter's Italian Catholic Church (property includes "The Immigrants" Sculpture")
- 1045 N Broadway, Casa Italiana (property includes the "Replica of Lupa Capitolina Statue")
- 1327 N Broadway
- 1231 N Spring St, Capitol Milling Company, Stearns Mill, Eagle Mills
- 1245 N Spring St, River Station (now Los Angeles State Historic Park)
- Elysian Park (portion)
- Buena Vista Street Viaduct (North Broadway Bridge)

(For a map of these historical resources in the Expanded Study Area, see Figure 5, below.)

[171] The portion of the East of Hill Street Chinatown District that is located within the Expanded Study Area contains two contributing buildings, both located at 951 N Broadway (DSR Design, Inc. and Realm).

FIGURE 5. Map of Historical Resources



8.0 ANALYSIS OF POTENTIAL IMPACTS

8.1 Framework for Analysis

Guidelines for Implementation of CEQA are codified at Title 14 California Code of Regulations section 15000 et seq. The *CEQA Guidelines* state that a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[172] A "substantial adverse change in the significance of a historical resource" means the "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."[173]

The *CEQA Guidelines* go on to state that "[t]he significance of an historical resource is materially impaired when a project…[d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources…local register of historical resources…or its identification in an historical resources survey."[174]

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

The *City of Los Angeles CEQA Thresholds Guide* states that a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of a historical resource.[175] A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and

[172] *CEQA Guidelines*, Section 15064.5(b).
[173] Ibid., section 15064.5(b)(1).
[174] Ibid., section 15064.5(b)(2).
[175] City of Los Angeles, *L.A. CEQA Thresholds Guide*, 2006, D.3-2.

Guidelines for Rehabilitating Historic Buildings; or

- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

8.2 Impact Analysis

POTENTIAL IMPACTS ON THE PROJECT SITE

As described in section 2.3 of this report, the Project will construct a new, approximately 1.3 million-square-foot, mixed-use residential, retail and restaurant complex, including multiple structures standing between 2 and 26 stories in height, over multiple levels of subterranean parking. As a result of the Project, all existing features – including all buildings, structures, and remnant features – will be demolished or removed from the Project Site.[176]

The Project Site consists of a portion of the River Station site, which is designated as Los Angeles Historic-Cultural Monument No. 82 and is considered a historical resource for the purposes of CEQA. The Project would result in considerable new construction on a portion of a designated historic resource.

In order for a change to a historical resource to be considered a "substantial adverse change," it must be shown that the change would *materially impair the significance of the historical resource*. That is, a project which demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historic significance would materially impair the significance of a historical resource, and thus would constitute a "substantial adverse change" under CEQA. Based upon a detailed analysis of the Project Site and its existing features, along with an understanding of the unique nature of the locally-designated Historic-Cultural Monument that comprises the historical resource on the Project Site, and the Project Site's historical relationship with River Station over time, the Project would not result in a substantial adverse change to a historical resource as defined by CEQA.

As described in section 7.1 of this report, when the River Station site was designated as a Historic-Cultural Monument in 1971, buildings and structures were specifically excluded from the designation. Despite the fact that many rail-related features were present throughout the Monument area at the time of designation – including buildings, structures, and numerous railroad tracks – almost all of these features have been removed or covered up over time such that little or no visible evidence of the former rail yard is currently evident. Thus, the former River Station site is considered historically significant as the location of important railroad activities only, and no physical

[176] The Zanja Madre is addressed in detail in the Cultural Resource Evaluation and Impact Assessment for the Buena Vista Project. As such, this feature is not evaluated in this report, and potential impacts of the Project to this feature are not analyzed herein.

structures or features directly contribute to its historic significance. The understanding that Historic-Cultural Monument No. 82 derives its historic significance as a site only, and not from extant physical fabric, has been reiterated and supported by the City since its 1971 designation. Therefore, any demolition and new construction within the boundaries for Historic-Cultural Monument No. 82 would not necessarily constitute a significant impact as defined by CEQA.

The only remaining feature of Historic-Cultural Monument No. 82 that reflects its history as a rail yard is the irregularly-shaped, uninterrupted open space occupying flat land at the base of the Elysian Hills just west of the Los Angeles River and north of downtown, wedged between North Spring Street and a steep bluff along what is now North Broadway. The existing Los Angeles State Historic Park, which encompasses the overwhelming majority of the former rail yard site, effectively preserves the flat, open expanse of land characteristic of the former River Station rail yard. The existence of State Historic Park retains the former rail yard's original location, boundaries, and open space such that the site can still be understood as a former rail yard. Interpretive displays also reference the rail yard history.

By contrast, the Project Site comprises the northern and westernmost edges of the River Station site, which appears to have been largely ancillary to the functioning of the River Station throughout its history. The majority of the Project Site is located along the top of the steep bluff that defines the edge of the State Park site. The abrupt grade change and steep slope would have rendered this portion of the River Station site impractical for most railroad uses. Additionally, the center portion of the Project Site narrows substantially between the bluff and North Broadway, making it undesirable for development of any kind. For these reasons, development on the Project Site has been very limited over time. When it did occur, it was typically composed of small-scale commercial or residential structures in the northern or southern portions of the site, oriented toward North Broadway and largely unrelated to the rail yard below.

As noted above, the southernmost portion of the Project Site, which sits at the base of the bluff and on grade with the former rail yard, contains a 1950s-era Southern Pacific Railroad Auto Repair Garage. This building will be demolished as part of the Project. Constructed long after the late 19th- and early 20th-century primacy of River Station as a rail yard, this is the only existing building on the Project Site with any association with Southern Pacific Railroad, again suggesting the Project Site's peripheral role in the development history and operation of River Station overall. Additionally, in 2002 the Metro A Line right-of-way was constructed along the base of the bluff, effectively and physically separating the Project Site from the rest of the River Station site as represented by the State Park. Today, it is difficult to discern any historical relationship between to the two sites.

The River Station Historic-Cultural Monument would not be materially impaired by demolition and new construction associated with the Project, and the ability of the historical resource to convey its historic significance as the site of the River Station rail yard would not be diminished because:

(1) Historic-Cultural Monument No. 82 is historically significant as the site of important railroad activity only, and its designation does not include any physical buildings or structures;

(2) Historic use of the Project Site portion of Historic-Cultural Monument No. 82 was ancillary to railroad operations; and

(3) The large expanse of open land historically associated with the River Station rail yard is preserved as Los Angeles State Historic Park.

Upon completion of the Project, the large expanse of open land associated with the former River Station rail yard, today memorialized as Los Angeles State Historic Park, will remain unaltered as it currently appears. As such, the Project does not have the potential to result in a substantial adverse change to Historic-Cultural Monument No. 82. The Project will not result in significant impacts to historical resources located on the Project Site.

POTENTIAL IMPACTS IN THE EXPANDED STUDY AREA

The Project Site is located in one of the oldest areas of the city. As outlined in the Historic Context above, this part of Los Angeles just north of downtown is home to some of the city's most important historic sites conveying some of the city's many layers of history, from the original pueblo settled along the banks of the Los Angeles River, to the city's earliest industrial development alongside its first railroad freight yard and passenger depot, to the home of Little Italy and later New Chinatown, to name just a few. For the purpose of this review, this report looked at parcels immediately adjacent to the Project Site (defined as the "Expanded Study Area") to determine if the Project had the potential to result in a substantial adverse change to a historical resource in its immediate vicinity. The Expanded Study Area includes parcels along the west side of North Broadway, across from the Project Site, between Elysian Park Drive to the north and Gin Ling Way to the south, as well as the Capitol Mill property immediately south of the Project Site, and the former site of Southern Pacific's River Station (now the Los Angeles State Historic Park) located southeast of the Project Site. As determined above, the Expanded Study Area contains fifteen (15) historical resources identified for the purposes of CEQA, including contributing features to an identified historic district.[177]

[177] The portion of the East of Hill Street Chinatown District that is located within the Expanded Study Area contains two contributing buildings, both located at 951 N Broadway (DSR Design, Inc. and Realm).

The Project will construct a 6-story Podium Level with a 26-story building (Building 1) and a 22-story building (Building 2) on the South Parcel. From the elevation of North Broadway, the 6-story Podium Level spans the South Parcel. The South Parcel also includes a parking garage within 3 levels located below the elevation of North Broadway.

From the elevation of North Broadway, the North Parcel includes: the 3-story "Retail Block;" the 6-story "Courtyard Building;" the 2-story "Podium;" and the 15-story "North Building." The Project would include a landscaped "Central Greenspace" in the central portion of the Project site to provide a new public amenity to showcase the views of surrounding areas to the southeast of the Project site. The open space area that links the North and South Parcels would be vegetated with native trees and understory vegetation. A public walkway would connect the North and South Parcels.

With new buildings rising as high as 26 stories, the proposed new construction will be substantially taller than any other existing building located in the near vicinity of the Project Site. In contrast, existing historic resources located north and west of the Project Site are generally two stories in height. New construction associated with the Project will, therefore, introduce imposing new skyline elements to the more modest building heights located immediately adjacent.

This effect will be moderated by massing that concentrates density to select portions of the Project Site. On the South Parcel, the Podium will rise 6 stories in height and constitute the majority of new construction facing N. Broadway. Density is concentrated in Building 1 and Building 2 which are set back from the Podium Level, effectively reducing the perception of mass and height from street level. The placement of Building 1 and Building 2 incorporate setbacks from the west, allowing the podium level height to define the western edge of the Project along North Broadway. Similarly, the majority of construction on the North Parcel is limited to 6 stories or less with height concentrated in the 15-story "North Building" as the Project Site's north end. The Central Greenspace" spanning the central section of the Project Site, which will not include any substantial new buildings, also will moderate the perception of density by allowing views looking east from North Broadway to remain. In addition, the Project's north-facing façades includes active retail uses on the ground-floor with direct pedestrian access at street level. The proposed new buildings will orient to the sidewalk, continuing the pattern of the street facing buildings along North Broadway.

All individual historical resources identified in the Expanded Study Area are physically separated from the Project Site by North Broadway, other buildings, or distance. Because new construction would be physically separated from these resources, all new construction associated with the Project, would not demolish or physically alter any of these resources or their immediate surroundings. As such, the Project would not materially impact the integrity or significance of any of these resources, which would

continue to convey their historic significance after implementation of the Project. The Project will not result in significant impacts to any historical resources in the vicinity of the Project Site.

As noted in Section 3.4 of this report, *historic integrity* is the ability of a property to convey its significance. Integrity is defined as the "authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic period."[178] The National Park Service defines seven aspects of integrity: *location, design, setting, materials, workmanship, feeling,* and *association*. Because all new construction will be contained within the Project Site, and the Project will not result in direct physical changes to any of the individual historic resources located in the Expanded Study Area, the Project would not affect the integrity of *location, design, materials*, or *workmanship* of any of those resources. All of the historic resources in the Expanded Study Area would remain intact in their current locations and would not be materially altered by new construction associated with the Project. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize these resources would continue to convey the resources' historic significance. Because all historic resources located in the Expanded Study Area would retain integrity of *location, design, materials, workmanship*, and *feeling*, these resources would continue to reflect their historic significance, and therefore integrity of *association* would also remain unaffected by the Project. According to National Park Service guidance, "to retain historic integrity a property will always possess several, and usually most, of the (seven) aspects" of integrity.[179] After the Project is constructed, all historic resources in the Expanded Study Area will fully retain integrity of *location, design, materials, workmanship, feeling* and *association*. The only aspect of integrity that could potentially be affected by the Project is *setting*.

The Project includes new construction that will introduce considerable density, height and massing on a site that has long been mostly vacant and historically has been occupied by low-density, low-scale development. Thus, the Project will result in an alteration to the immediate surroundings of the historical resources in the Expanded Study Area. However, in order for this alteration to be considered a substantial adverse change to the setting of the resource, it must be shown that the significance of the historical resource would be materially impaired by the proposed alteration.

Setting features important to the significance of individual historic resources in the Expanded Study Area are typically limited to the resource property itself and immediately adjacent public rights-of way, such as streets and sidewalks. For the Buena Vista Street Viaduct, the Los Angeles River is also a critical component of the resource's setting. None of these setting features will be changed by the Project. The Project Site's historical character as occupied by low-density, low-rise development is not an

[178] National Register Bulletin 16A, 3.
[179] National Register Bulletin 15, 44.

important aspect of the setting of surrounding historical resources. Additionally, the Project Site's existing character as a predominately vacant site is circumstantial and is not critical to understanding the significance of historical resources in the immediate vicinity. Thus, while the Project Site is situated within the immediate surroundings of several historical resources, it is not considered a critical or character-defining aspect of the setting of these historical resources.

Moreover, the immediate surroundings, including the Expanded Study Area, are distinctly urban in nature and characterized by a diverse collection of commercial, residential, and institutional buildings of various scales, types and styles, dating from the late-19th century to the present. The setting of these historical resources has evolved since their original construction, yet all have still maintained sufficient integrity to convey historic significance.

Similarly, the identified East of Hill Street Chinatown District is located southwest of the Project Site. The Project Site is outside of this identified District boundary and is separated by North Broadway. The Project will not demolish, relocate, or alter any contributing or non-contributing building within this District. New construction associated with the Project will not take place on any area located within the identified District boundary. The Project will not affect the integrity of any of the identified District contributors or the District as a whole. All the contributing buildings would remain intact in their current locations and would not be materially altered by the Project. Therefore, the identified District would continue to convey its significance after construction of the Project.

Finally, construction activities for the Project could have the potential to result in a substantial adverse change to the two immediately adjacent historical resources: the Capitol Milling Company building to the south and the Buena Vista Street Viaduct to the north. Ground-disturbing activities–including excavation, regrading, and/or new construction–for three levels of subterranean parking could destabilize the surrounding area and compromise the structural integrity of adjacent properties. These potential impacts are analyzed in the Noise and Vibration Technical Study, and thus are not addressed in this report.

After construction of the Project, all of the historical resources in the Expanded Study Area will remain intact, in their original locations, and will continue to convey their historic significance. Therefore, alteration of the immediate surroundings of historical resources in the Expanded Study Area caused by the Project will not reduce the integrity or significance of any of these historical resources. As such, the Project will not result in a substantial adverse change to any of the historical resources in the Expanded Study Area.

8.3 Cumulative Impacts

Twenty-five (25) related projects (the "Related Projects") have been identified for the Buena Vista Project, as identified in the Supplemental Transportation Assessment submitted for the Project to the Los Angeles Department of Transportation in August 2024.[180] A significant cumulative impact associated with the Project and Related Projects would occur if the combined impact of the Project and Related Projects would impair of the significance of a historic resource, such as by rendering an individual historical resource or historic district no longer eligible for historic listing.

As noted in Section 8.2 above, while added density and scale associated with the Project and the Related Projects would alter the larger surroundings of adjacent historical resources, the Project and Expanded Study Area have an urban setting which has evolved over time. Its immediate surroundings are characterized by a diverse collection of building types, styles, and scales dating from various periods of development. After construction of the Project, the historical resources in the Expanded Study Area will remain intact and continue to convey their historic significance. Therefore, alteration of the immediate surroundings caused by the Project will not reduce the integrity or significance of any historic resources on or in the immediate vicinity of the Project Site. Similarly, due to the diverse urban environs surrounding the Project, the development of the Related Projects would not, in and of itself, reduce the integrity of setting of any nearby historic resource, and each of the Related Projects would be required to study and, if necessary, mitigate any other impacts to the integrity or significance of surrounding historic resources. For these reasons, the Project in combination with the Related Projects would not represent a cumulatively considerable impact to the historic setting of any identified historical resource, therefore, cumulative impacts in this regard would be less than significant. Related projects are responsible for conducting their own environmental review, including analysis of potential impacts to historical resources.

In assessing cumulative impacts on historical resources, the focus is on related projects that are located in the immediate vicinity of the Project that have the potential to contribute to changes in the setting of identified historical resources on the Project Site and in the vicinity, including historic districts. Of the 25 Related Projects that have been identified for the Project, nine (9) are located within 1,000 feet of the Project Site and therefore are the focus of this cumulative impacts analysis.

A. 1101 NORTH MAIN CONDOS

The 1101 North Main Condos project would construct 318 condominium units at 1101 N Main Street. This Related Project is not located within the immediate vicinity of any of the identified historical resources. Therefore, the Project in combination with this

[180] Supplemental Transportation Assessment for the Buena Vista Project, Los Angeles, California. Gibson Transportation Consulting, Inc. August 2024.

Related Project would not have the potential to result in a cumulatively considerable impact to the historic setting of any historical resources.

B. COLLEGE STATION MIXED-USE

The College Station Mixed-Use project would construct 725 apartment units and 51,600 square feet of commercial space at 129 W College Street/924 N Spring Street. This Related Project is located south/southeast of the Project Site, and just across N Spring Street from two historical resources: the historical resource at 1231 N Spring Street (Capitol Milling Company), and the historical resource at 1245 N Spring Street (River Station, now Los Angeles State Historic Park). As described in the impacts analysis above, the Project will not result in any significant impact to either of these historical resources. The Project will result in an alteration to the immediate surroundings of the historical resources; however, it will not reduce the resources' integrity of setting. For both of these historical resources, setting features that are important to their significance are limited to the resource property itself and immediately adjacent public rights-of way, such as streets and sidewalks. None of these setting features will be changed by the Project. Therefore, the Project in combination with this Related Project would not represent a cumulatively considerable impact to the historic setting of either of these historical resources. Therefore, cumulative impacts in this regard would be less than significant.

C. 1201 NORTH BROADWAY MIXED-USE

The 1201 North Broadway Mixed-Use project would construct 118 apartment units and 8,800 square feet of commercial/office space at 1201 N. Broadway. This Related Project is located north/northwest of the Project Site, and just across Bishops Road from the historical resource at 1253 N Bishops Road (Cathedral High School). As described in the impacts analysis above, the Project will not result in any significant impact to this historical resource. The Project will result in an alteration to the immediate surroundings of the historical resource; however, it will not reduce the resource's integrity of setting. For this historical resource, setting features that are important to its significance is limited to the resource property itself and immediately adjacent public rights-of way, such as streets and sidewalks. None of these setting features will be changed by the Project. Therefore, the Project in combination with this Related Project would not represent a cumulatively considerable impact to the historic setting of this historical resource. Therefore, cumulative impacts in this regard would be less than significant.

D. 942 BROADWAY

The 942 Broadway project would construct 178 residential units and 35,805 square feet of commercial restaurant and office space at 942 N. Broadway. This Related Project is located just southwest of the Project Site. It is immediately adjacent to the historical resource at 1231 N Spring Street (Capitol Milling Company), and just across Broadway

from the East of Hill Street Chinatown District. As described in the impacts analysis above, the Project will not result in any significant impact to either of these historical resources. The Project will result in an alteration to the immediate surroundings of the historical resources; however, it will not reduce the resources' integrity of setting. For the Capitol Milling Company, setting features that are important to its significance are limited to the resource property itself and immediately adjacent public rights-of way, such as streets and sidewalks. None of these setting features will be changed by the Project.

Regarding the East of Hill Street Chinatown District, aspects of the district's setting that are important to its significance are contained within the boundaries of the district itself. The commercial development that comprises the East of Hill Street Chinatown District was conceived as a comprehensive themed environment which is inwardly focused and does not engage with its urban surroundings. As such, important aspects of the district's setting include its internal pedestrian circulation pattern; overall arrangement and configuration of contributing buildings and other built features (walkways, plazas, landscape features, public art); and the spatial and visual relationships between and among these contributing features. None of these setting features will be changed by the Project. While the Project and this Related Project would both add new visual features to the surroundings of the historic district, the area beyond the boundaries of the district does not contribute to the significance of the historical resource. Furthermore, while these new features may be visible from certain vantage points within the district boundaries, this would not diminish the ability of the historical resource to convey its significance. Therefore, the Project in combination with this Related Project would not represent a cumulatively considerable impact to the historic setting of this historical resource. Therefore, cumulative impacts in this regard would be less than significant.

E. 843 NORTH SPRING STREET

The 843 North Spring Street project would construct 100,517 square feet of commercial office and restaurant space at 843 N. Spring Street. This Related Project is located south of the Project Site. It is situated south of the historical resource at 1231 N Spring Street (Capitol Milling Company), separated by College Street and another developed parcel at 900 N Broadway. As described in the impacts analysis above, the Project will not result in any significant impact to this historical resource. The Project will result in an alteration to the immediate surroundings of the historical resource; however, it will not reduce the resource's integrity of setting. For both of these historical resources, setting features that are important to their significance are limited to the resource property itself and immediately adjacent public rights-of way, such as streets and sidewalks. None of these setting features will be changed by the Project. Therefore, the Project in combination with this Related Project would not represent a cumulatively considerable impact to the historic setting of either of these historical resources. Therefore,

cumulative impacts in this regard would be less than significant.

F. PAGODA HOTEL

The Pagoda Hotel project would construct 101 hotel rooms and 6,211 square feet of restaurant space at 995 N. Broadway. This Related Project is located west of the Project Site. It is situated immediately adjacent to the historical resource at 993 Broadway (Soo Yuen Fraternal Association); one parcel from the historical resource at 989 Broadway (Lung Kong Tin Yee Association); and across Bernard Street from the historical resource at 1001 Broadway. As described in the impacts analysis above, the Project will not result in any significant impact to these historical resources. The Project will result in an alteration to the immediate surroundings of the historical resources; however, it will not reduce these resources' integrity of setting. Setting features that are important to their significance are limited to the resource property itself and immediately adjacent public rights-of way, such as streets and sidewalks. None of these setting features will be changed by the Project. Therefore, the Project in combination with this Related Project would not represent a cumulatively considerable impact to the historic setting of any of these historical resources. Therefore, cumulative impacts in this regard would be less than significant.

G. 1101 NORTH BROADWAY

The 1101 North Broadway project would construct 92 hotel rooms, a 1,713-square-foot restaurant, 895-square-foot café/retail space, and a 978-square-foot café. This Related Project is located north/northwest of the Project Site, and immediately adjacent to the historical resource at 1253 N Bishops Road (Cathedral High School). As described in the impacts analysis above, the Project will not result in any significant impact to this historical resource. The Project will result in an alteration to the immediate surroundings of the historical resource; however, it will not reduce the resource's integrity of setting. Setting features that are important to its significance are limited to the resource property itself and immediately adjacent public rights-of way, such as streets and sidewalks. None of these setting features will be changed by the Project. Therefore, the Project in combination with this Related Project would not represent a cumulatively considerable impact to the historic setting of this historical resource. Therefore, cumulative impacts in this regard would be less than significant.

H. LOS ANGELES STATE HISTORIC PARK PEDESTRIAN BRIDGE

The Los Angeles State Historic Park Pedestrian Bridge project would construct a pedestrian connection to provide access to the Los Angeles State Historic Park from Broadway. However, at the time of this writing there is no design for this project, and thus this Related Project cannot be located in relation to the Project Site or to any identified historical resources. However, as described in the impacts analysis above, the Project will not result in any significant impact to any historical resource. The Project will result in an alteration to the immediate surroundings of several historical resource;

however, it will not reduce these resources' integrity of setting. Therefore, it can be presumed that the Project in combination with this Related Project would not represent a cumulatively considerable impact to the historic setting of any historical resource. Therefore, cumulative impacts in this regard would be less than significant.

I. LOS ANGELES AERIAL RAPID TRANSIT

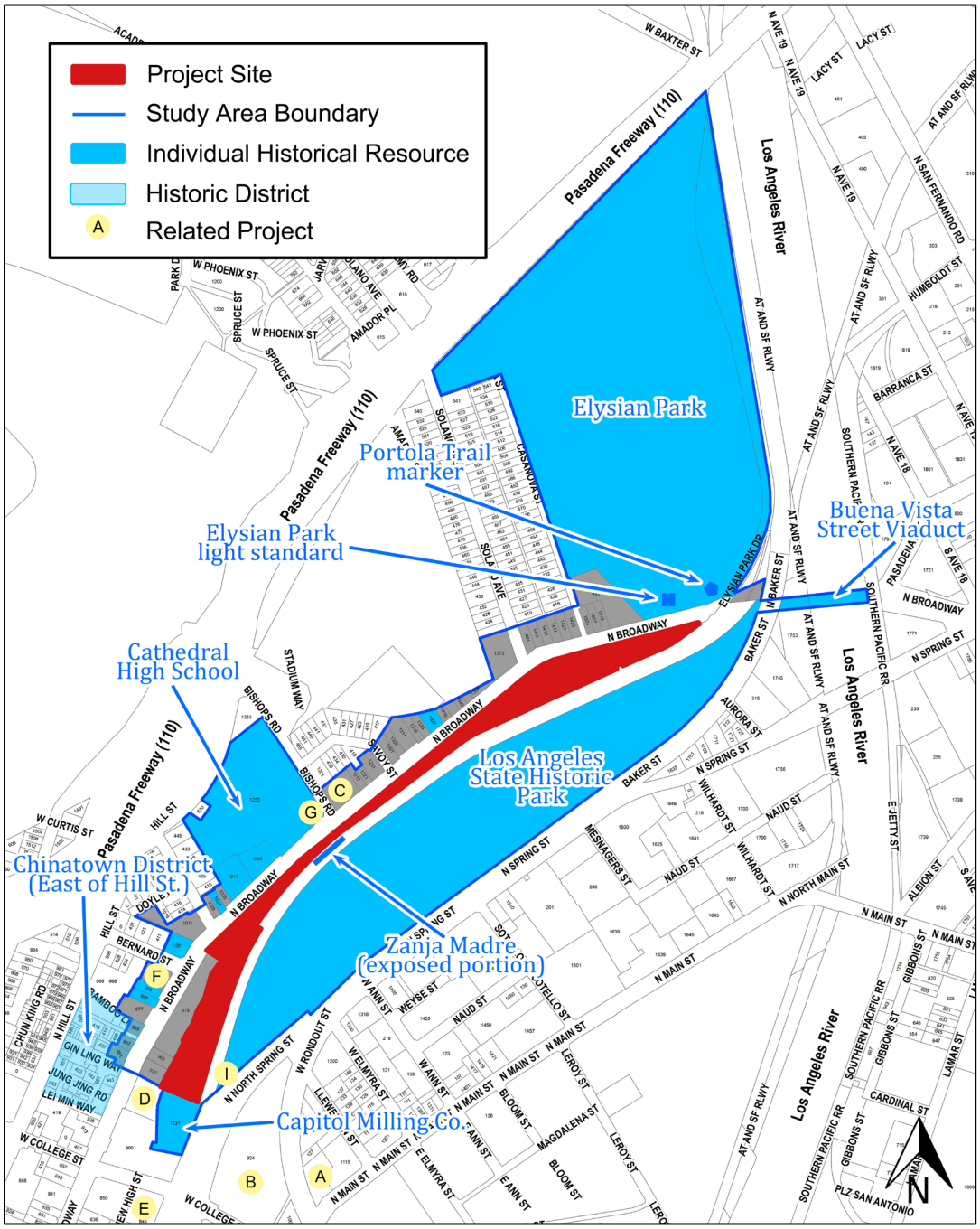
The Los Angeles Aerial Rapid Transit project would construct an aerial rapid transit gondola system to provide daily transit service to connect the communities of El Pueblo, Mission Junction, Solano Canyon, and William Mead Homes. The proposed route would include stations at Union Station, Chinatown/Los Angeles State Historic Park, and Dodger Stadium. The Chinatown/State Park Station is located within 1,000 feet of the Project Site and therefore is considered as part of this cumulative impacts analysis. The proposed Chinatown/State Park Station is located south/southeast of the Project Site, and is just across the Metro A Line right-of-way from the historical resource at 1231 N Spring Street (Capitol Milling Company). As described in the impacts analysis above, the Project will not result in any significant impact to this historical resource. The Project will result in an alteration to the immediate surroundings of the historical resource; however, it will not reduce the resource's integrity of setting. Setting features that are important to its significance are limited to the resource property itself and immediately adjacent public rights-of way, such as streets and sidewalks. None of these setting features will be changed by the Project. Therefore, the Project in combination with this Related Project would not represent a cumulatively considerable impact to the historic setting of this historical resource. Therefore, cumulative impacts in this regard would be less than significant.

J. 130 W. COLLEGE STREET

The 130 W. College Street project would construct 224,597 square feet of commercial office space with 8,205 square feet of retail and restaurant space. This Related Project is located south of the Project Site. It is situated southeast of the historical resource at 1231 N Spring Street (Capitol Milling Company), separated by N. Spring Street and College Street. As described in the impacts analysis above, the Project will not result in any significant impact to this historical resource. The Project will result in an alteration to the immediate surroundings of the historical resource; however, it will not reduce the resource's integrity of setting. For both of these historical resources, setting features that are important to their significance are limited to the resource property itself and immediately adjacent public rights-of way, such as streets and sidewalks. None of these setting features will be changed by the Project. Therefore, the Project in combination with this Related Project would not represent a cumulatively considerable impact to the historic setting of either of these historical resources. Therefore, cumulative impacts in this regard would be less than significant.

(For a map of these Related Projects, see Figure 6, below.)

FIGURE 6. Map of Related Projects



A. 1101 North Main Condos
B. College Station Mixed-Use
C. 1201 North Broadway Mixed-Use
D. 942 Broadway
E. 843 North Spring Street
F. Pagoda Hotel
G. 1101 North Broadway
H. (Location unknown/not mapped)
I. Aerial Rapid Transit Station
J. 130 W. College Street

Also, as noted in Section 8.2 above, analysis of the potential impacts to historical resources has demonstrated that without mitigation, the Project has the potential to compromise the structural integrity of adjacent historical resources through excavation and construction procedures, which could result in a significant impact to the Capitol Milling Company property or the Buena Vista Street Viaduct (now North Broadway Bridge). However, with the mitigation measures discussed in Section 8.2, above, and further discussed in Section 9.1, below, to ensure that excavation and construction procedures will not damage these adjacent historical resources, the Project will not result in significant impacts on identified historical resources. As is common in similar urban development sites, vibration and settlement would be controlled through adherence to design values prescribed by the shoring engineer and geotechnical engineer with the intent to prevent damage to adjacent structures, and through monitoring of associated construction activities. Similarly, each of the Related Projects would be required to implement mitigation measures to prevent any damage to the structural integrity of adjacent structures, including any historic resources. Therefore, the Project and the Related Projects would not have a cumulatively considerable impact to historic resources attributable to construction-related vibration or structural effects.

8.4 CEQA Thresholds

Analysis of potential impacts to historical resources reveals that the Project will alter the setting and surroundings of historical resources but that the alteration will not result in a substantial adverse change to the significance of those identified resources. Construction activities do have the potential to cause a substantial adverse change to immediately adjacent historical resources if not mitigated. The following discussion reiterates the findings of the historic impacts analysis above using the thresholds provided in the CEQA Thresholds Guide.

Would the Project involve the demolition of a significant resource?
The Project will not demolish a significant resource. There are no historical resources on the Project Site that would be demolished as part of the Project. The Project will demolish or remove all existing structures from the Project Site, which is a portion of the River Station site, a historical resource. However, the historic designation for the River Station site excluded all structures. Thus, no demolition is proposed for the remainder of the historical resource, now occupied by the Metro A Line right-of-way and the Los Angeles State Historic Park. The Project does not include any demolition, including demolition of identified historic resources or of structures in a historic district, in the Expanded Study Area. Therefore, the Project will not involve demolition of a significant resource.

Would the Project involve relocation that does not maintain the integrity and significance of a significant resource?
The Project does not include relocation of any buildings, structures, or other features,

either on the Project Site or in the Expanded Study Area. Therefore, the Project will not relocate any significant resource.

Would the Project involve conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings?
The Project does not include conversion, rehabilitation, or alteration of any buildings, structures, or other features, either on the Project Site on in the Expanded Study Area. Therefore, the Project will not convert, rehabilitate, or alter any significant resource.

Would the Project involve construction that reduces the integrity or significance of an important resource on the site or in the vicinity?
The Project will alter the immediate surroundings of historical resources in the Expanded Study Area by constructing a new, approximately 1.3 million-square foot mixed-use development of residential and commercial uses with multiple structures standing between 2 and 26 stories in height, over multiple levels of subterranean parking. However, for this alteration to be considered a substantial adverse change under CEQA, it must be shown that the integrity and/or significance of the historical resources would be materially impaired. The significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance.

All historic resources will fully retain integrity of *location, design, materials, workmanship*, *feeling* and *association*. Only one aspect of integrity, integrity of *setting*, would be altered by the Project. As stated above, the Project and Expanded Study Area have an urban setting which has evolved over time. Their immediate surroundings are characterized by a diverse collection of building types, styles, and scales dating from various periods of development. After construction of the Project, the historical resources in the Expanded Study Area will remain intact and continue to convey their historic significance. Therefore, alteration of the immediate surroundings caused by the Project will not reduce the integrity or significance of any important resources on or in the immediate vicinity of the Project Site.

The Project includes substantial new construction immediately adjacent to two historical resources: the Capitol Milling Company building to the south, and the Buena Vista Street Viaduct to the north. Construction activities for the Project have the potential to result in a substantial adverse change to these historical resources. Ground-disturbing activities–including excavation, regrading, and/or new construction–for three levels of subterranean parking could destabilize the surrounding area and compromise the structural integrity of adjacent properties. These potential impacts are analyzed in the Noise and Vibration Technical Study.

8.5 Summary of Impacts

Analysis of the potential impacts to historical resources has demonstrated that the Project may have the potential to compromise the structural integrity of adjacent historical resources through excavation and construction procedures, which may result in a significant impact to the Capitol Milling Company property or the Buena Vista Street Viaduct (now North Broadway Bridge), which are historical resources under CEQA. For analysis of these potential impacts, including proposed mitigation and determination of level of impact with mitigation, see the Noise and Vibration Technical Study.

9.0 RECOMMENDATIONS

This report recommends the following voluntary measure to enhance public awareness of the historic significance of the River Station site, as primarily preserved within the Los Angeles State Historic Park.

1. The Project will include an on-site interpretative display commemorating the history of the River Station site. Interpretive displays in these areas may utilize a combination of text, images, perspective drawings, and maps to convey the development history and historical importance of the River Station rail yard and its immediate surroundings over time.

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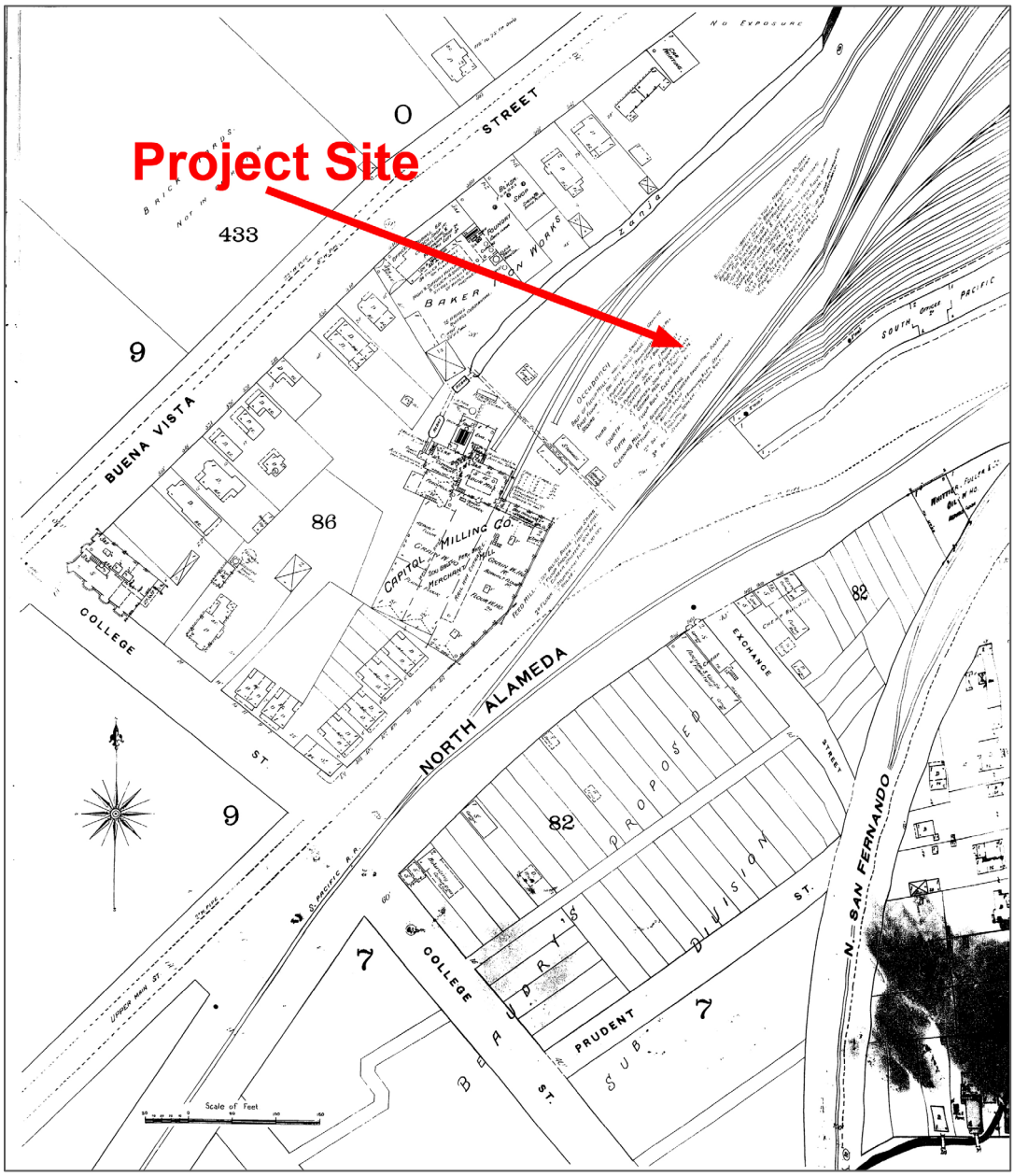
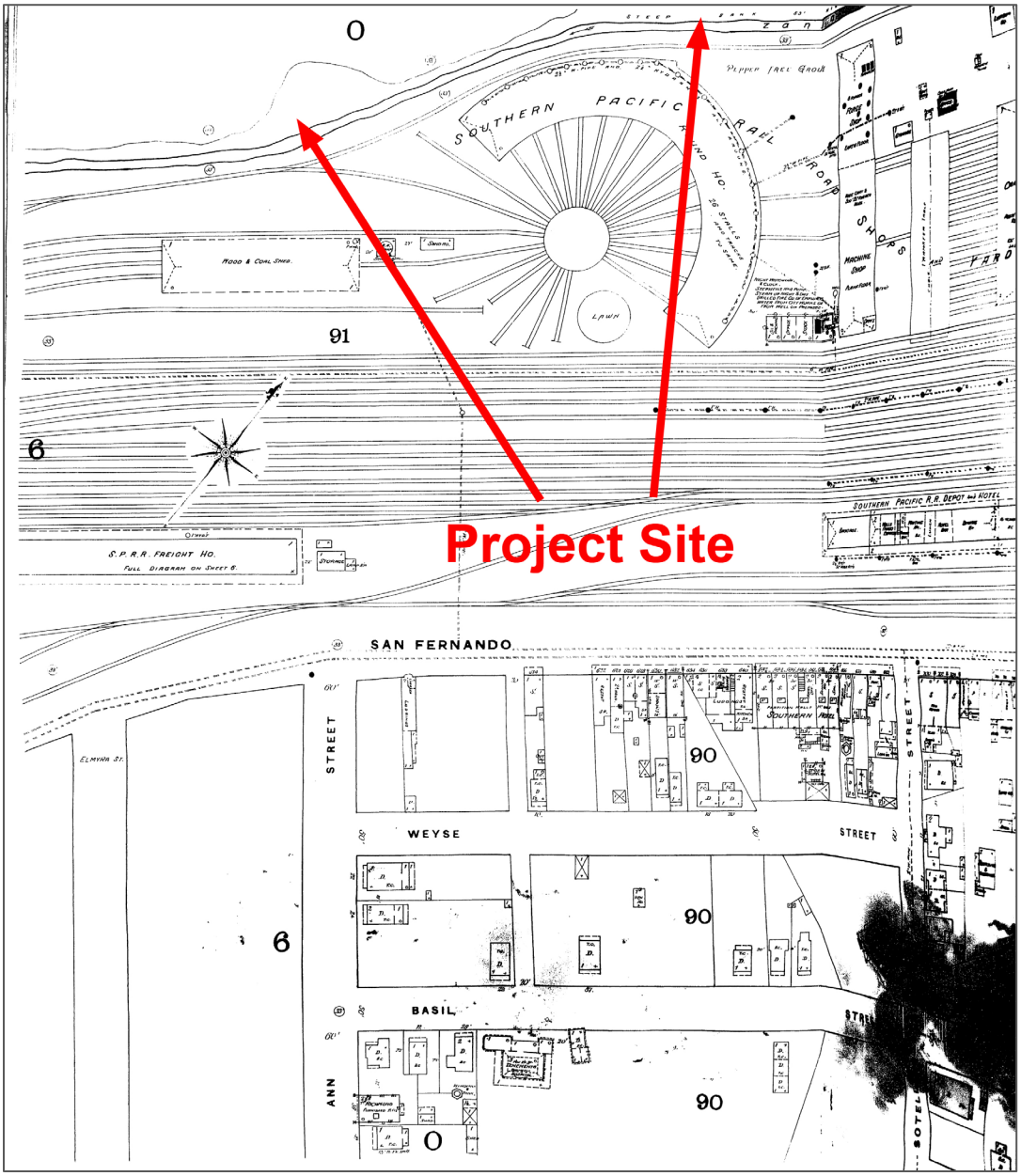
APPENDIX A: SANBORN MAPS



Sanborn fire insurance map, 1888. (Sanborn Map Co.)



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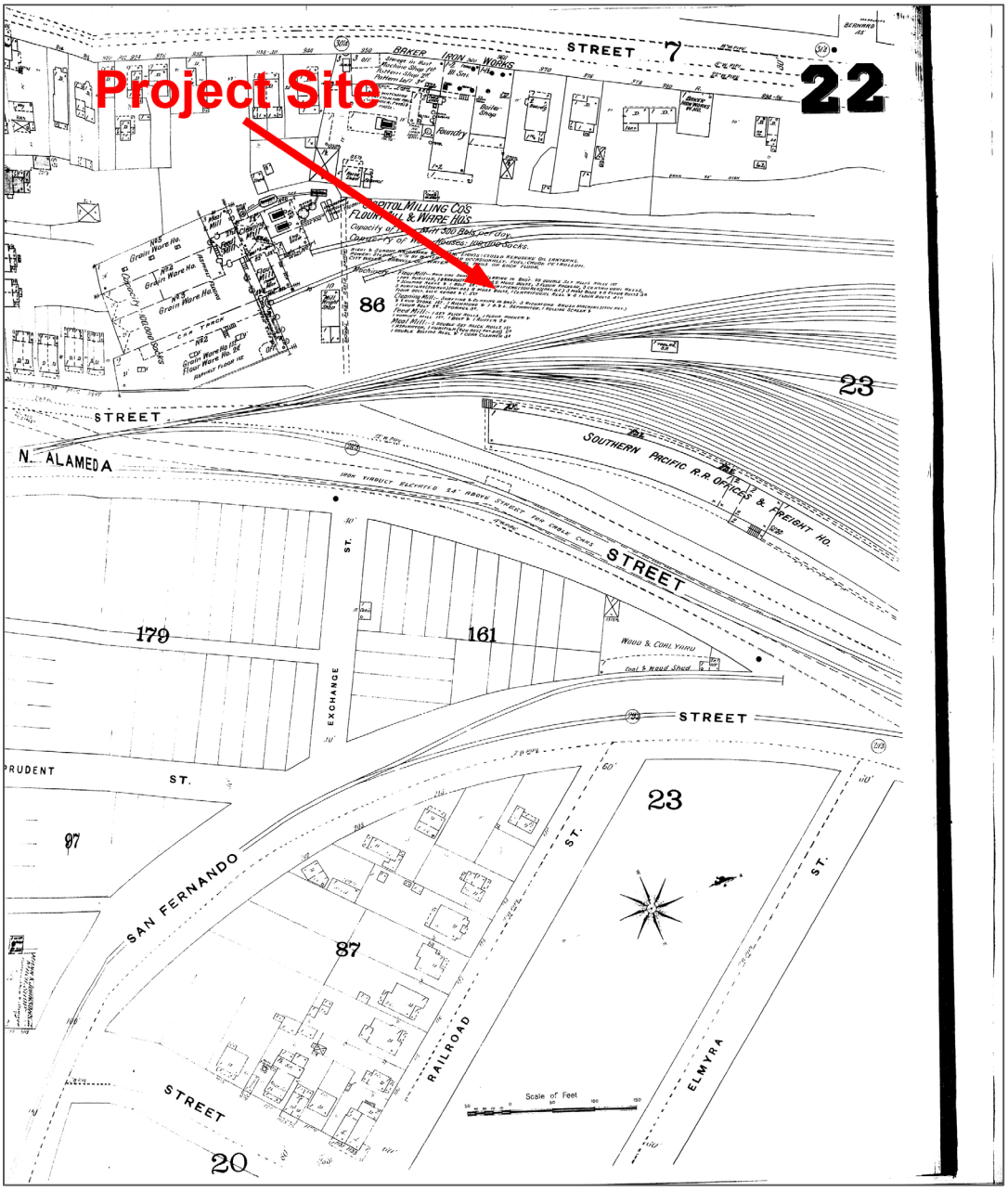
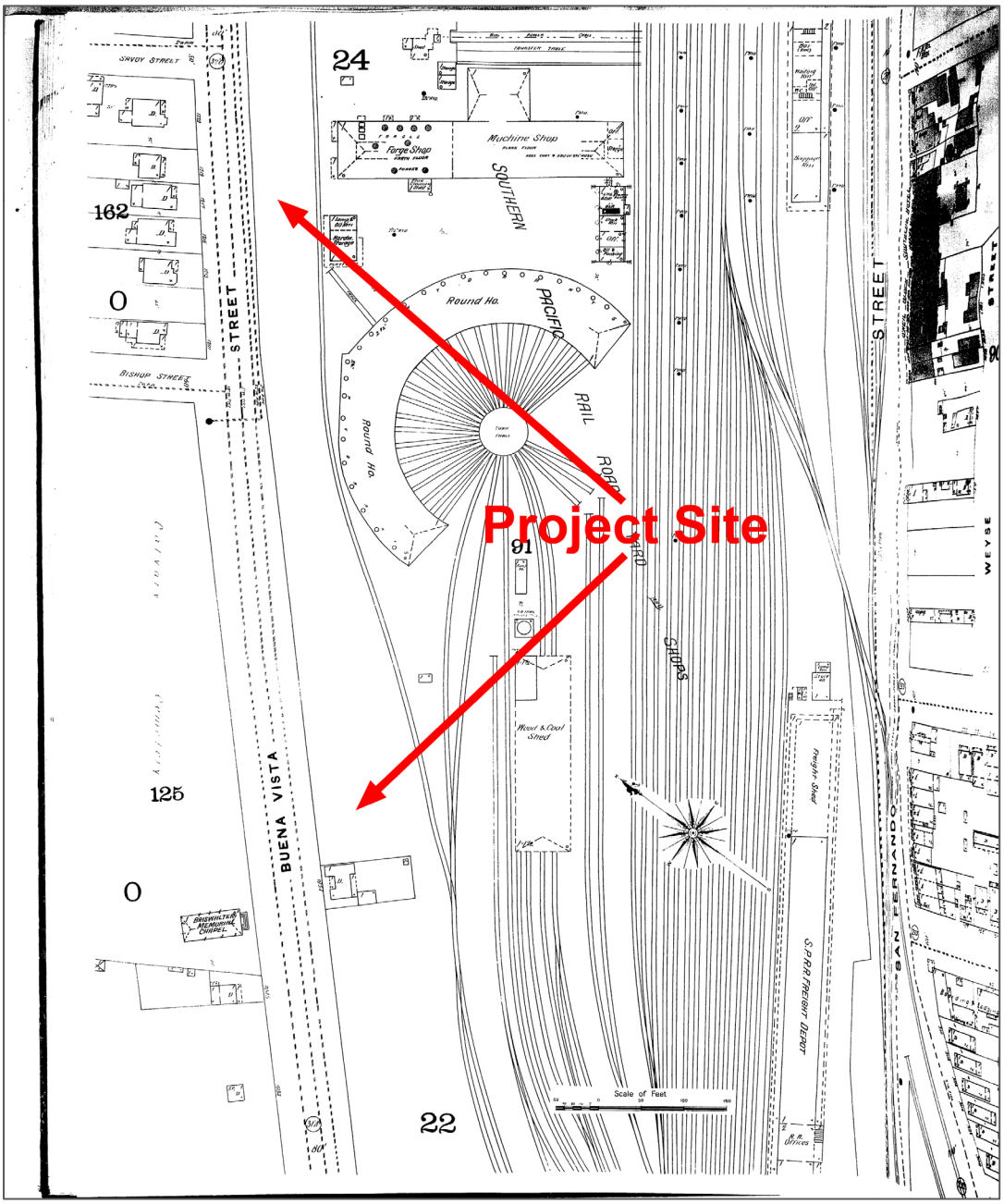
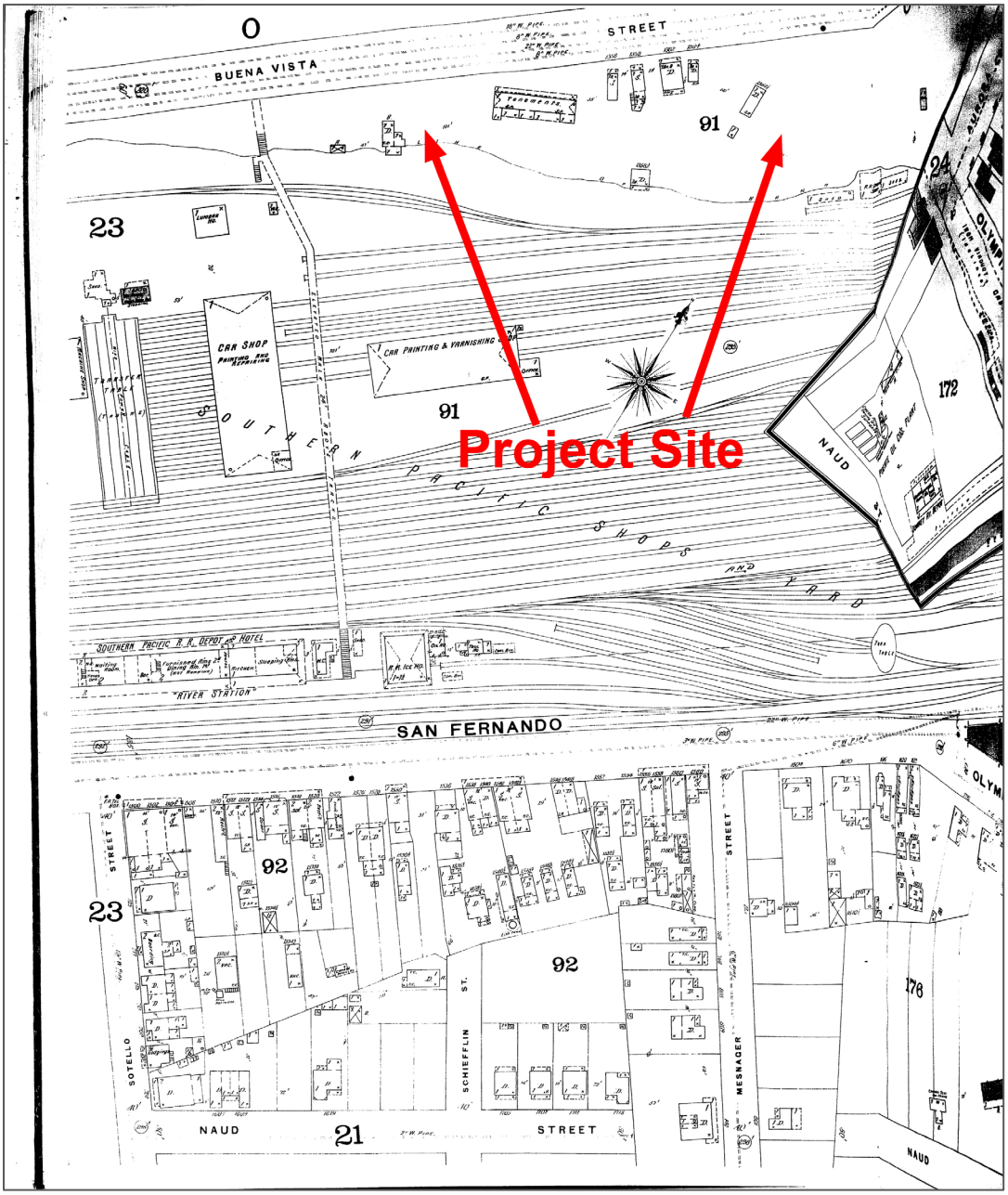


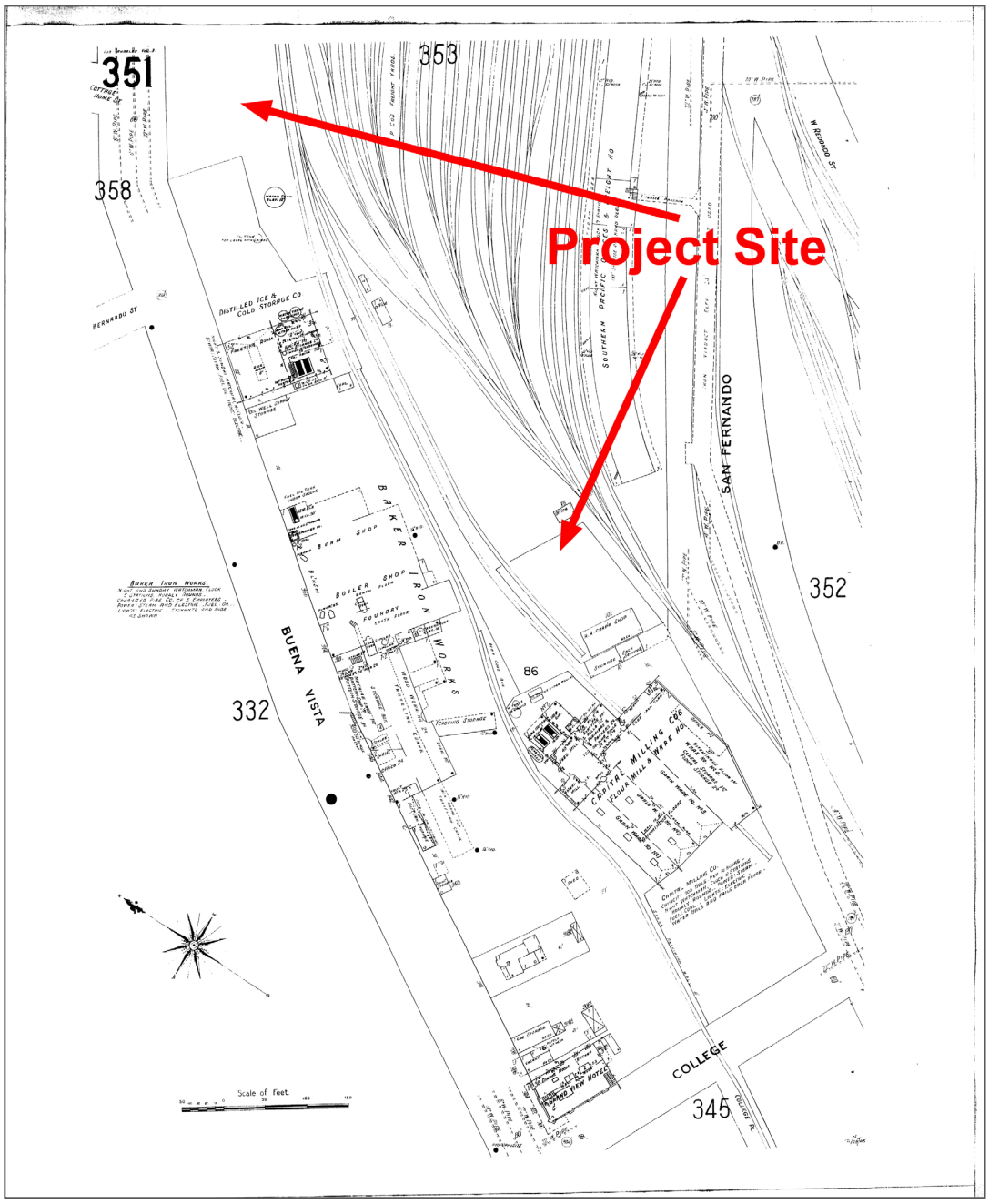
Sanborn fire insurance map, 1894. (Sanborn Map Co.)



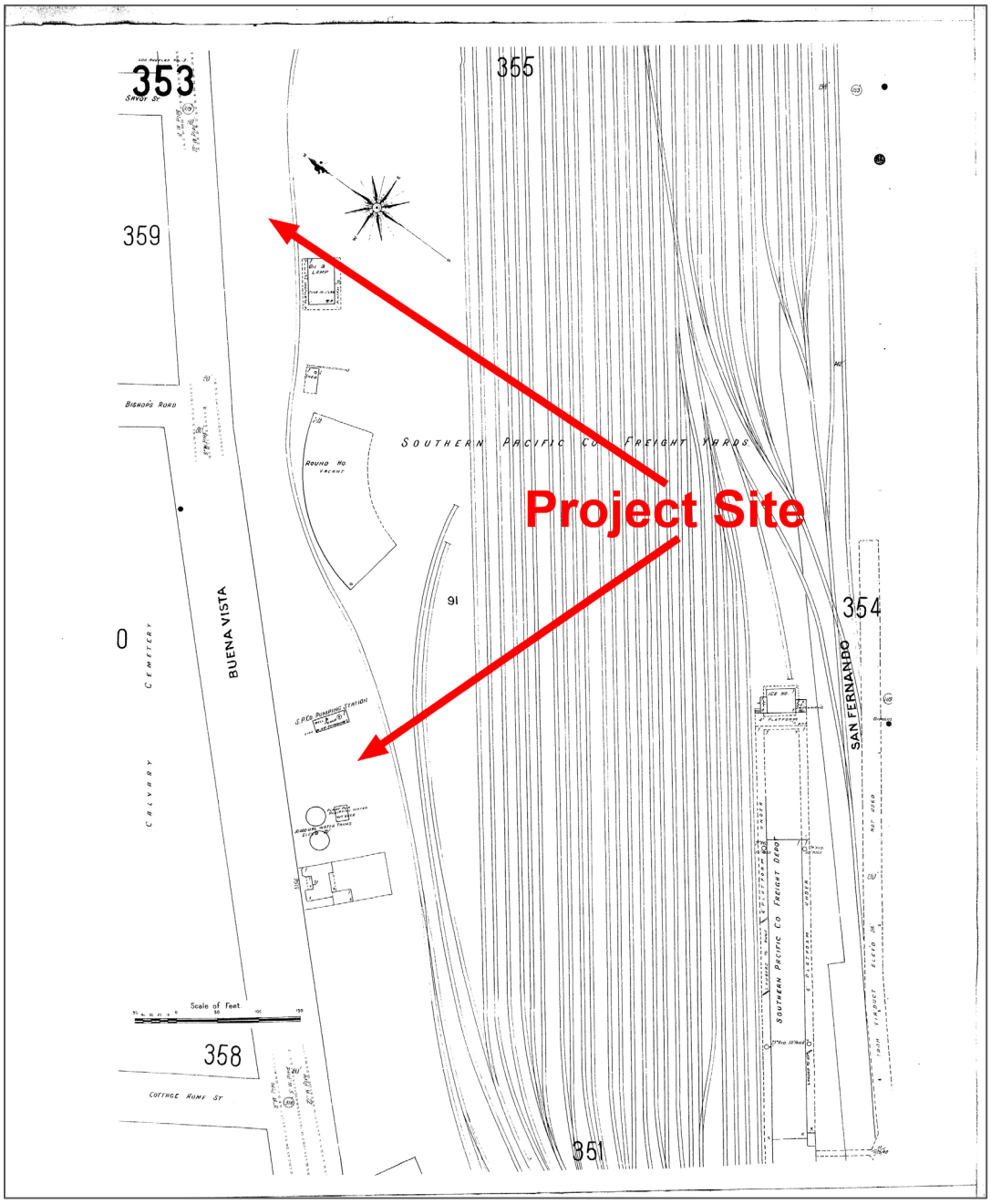
Sanborn fire insurance map, 1894. (Sanborn Map Co.)



Sanborn fire insurance map, 1894. (Sanborn Map Co.)



Sanborn fire insurance map, 1906. (Sanborn Map Co.)



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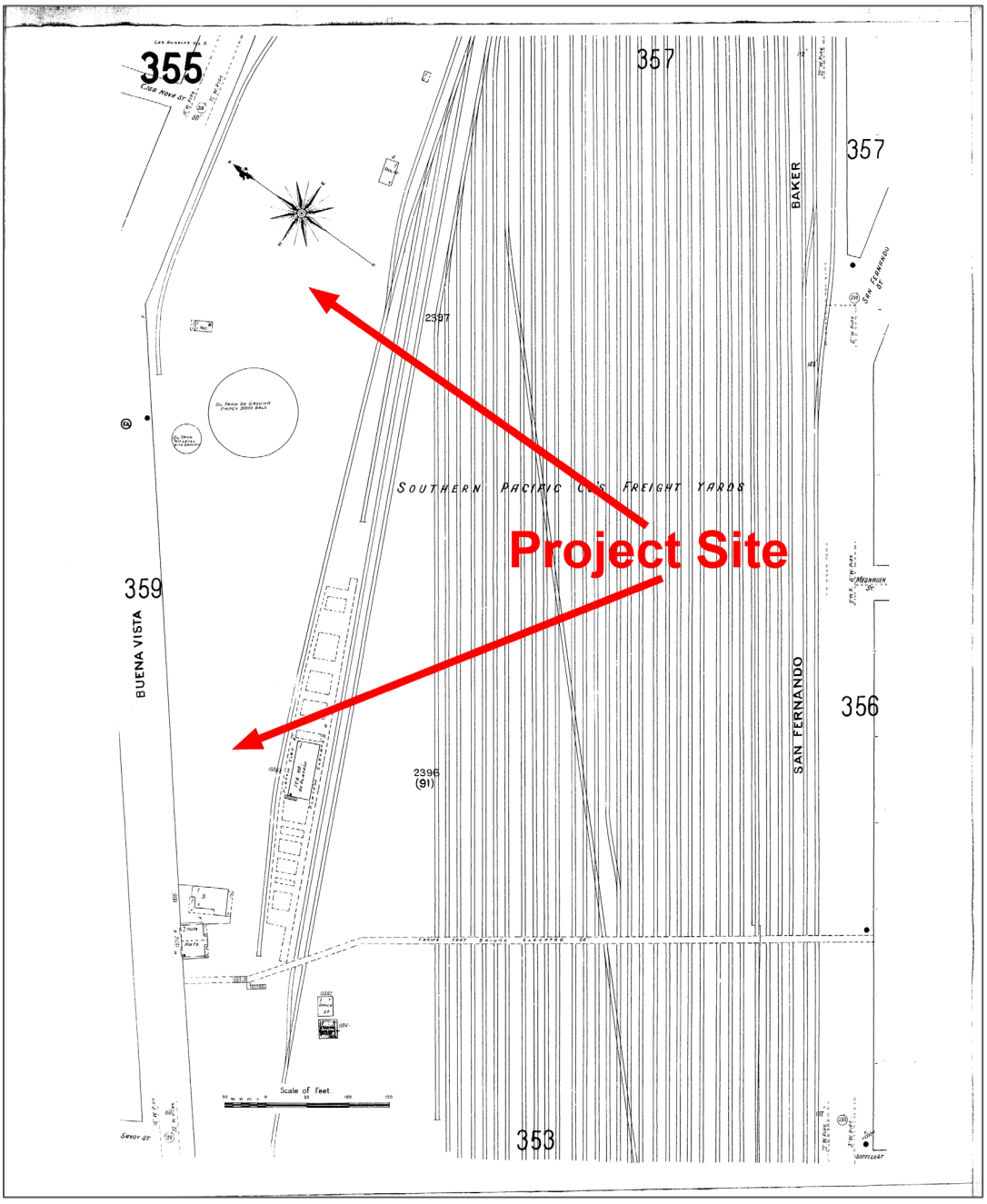
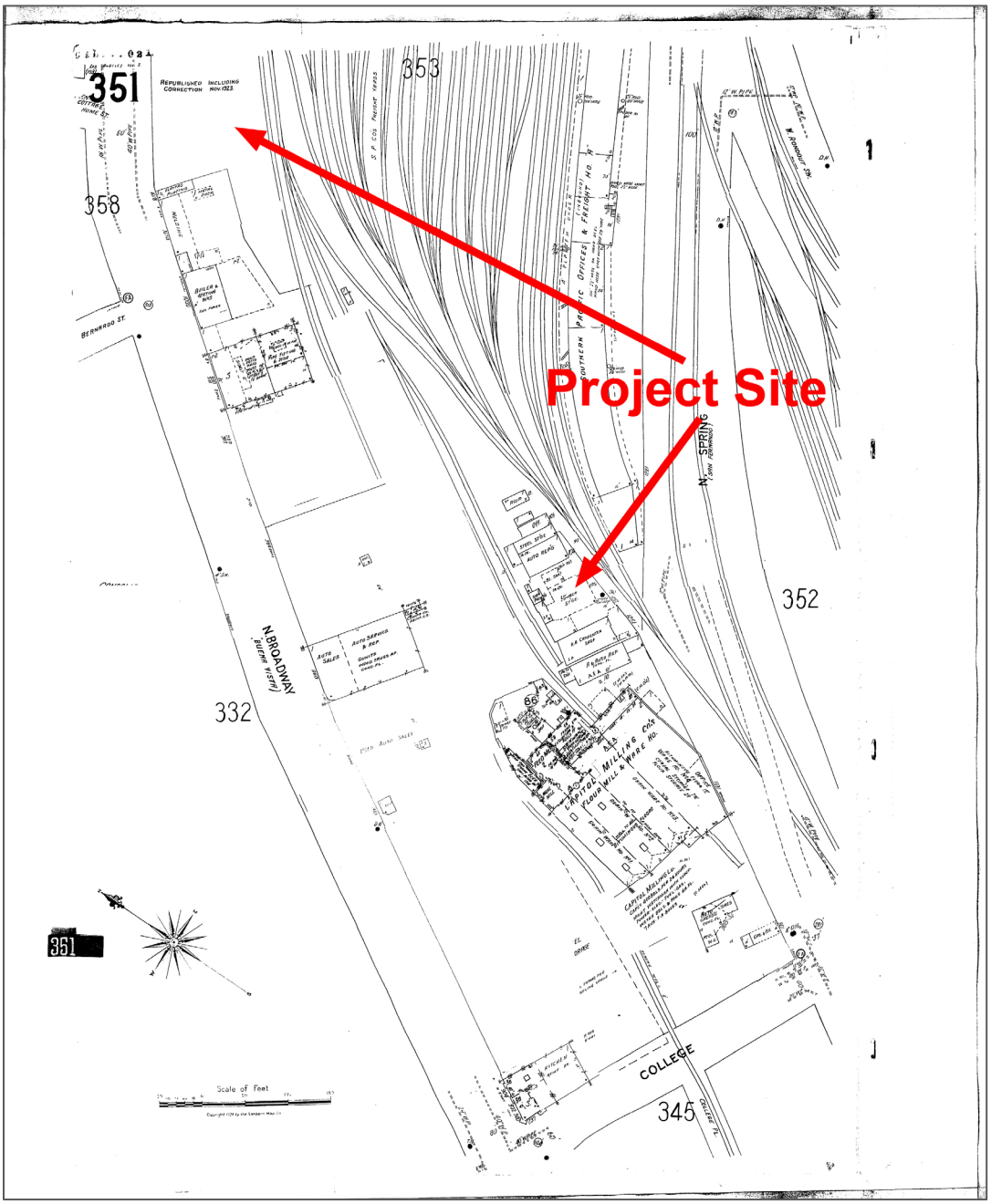
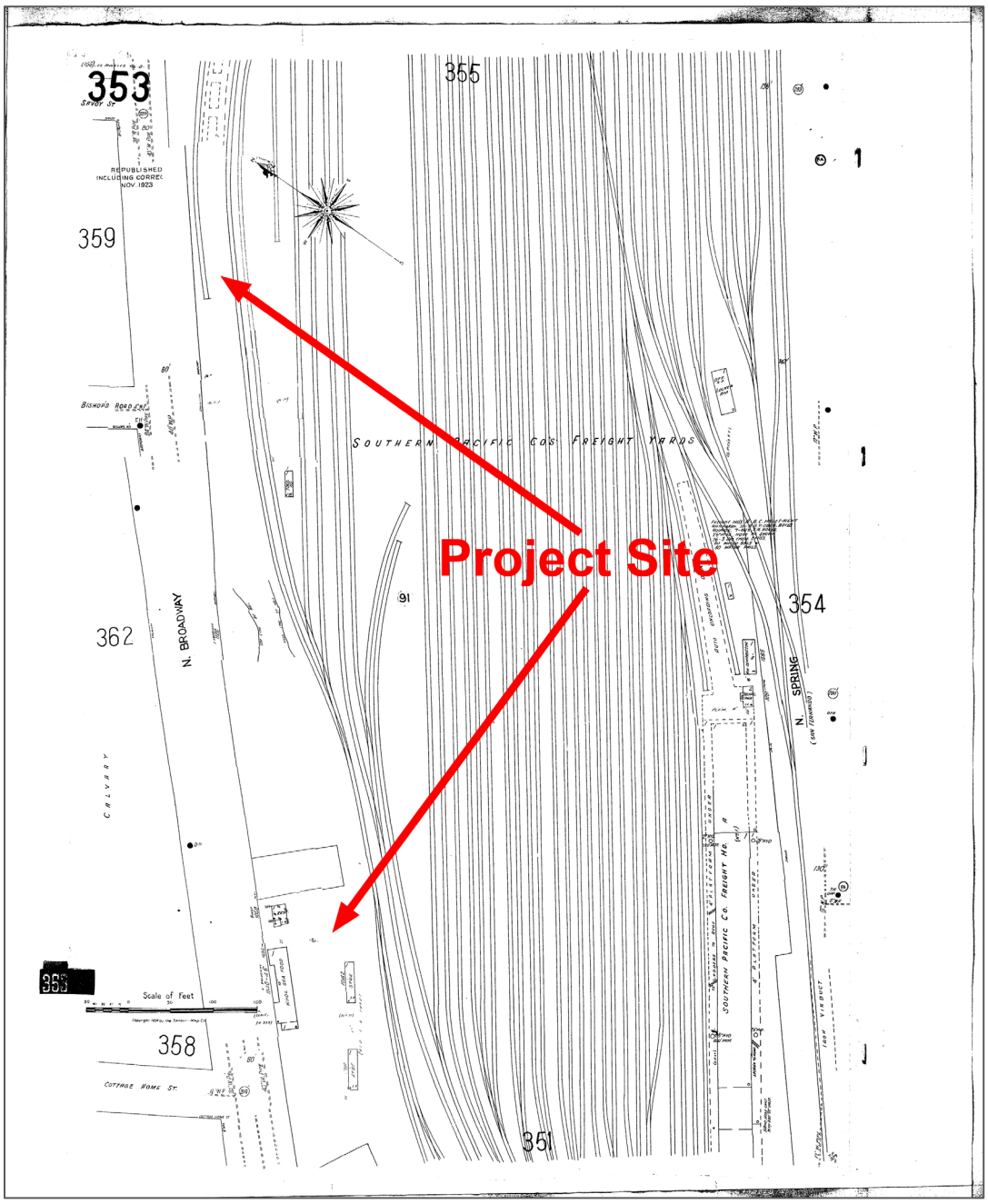


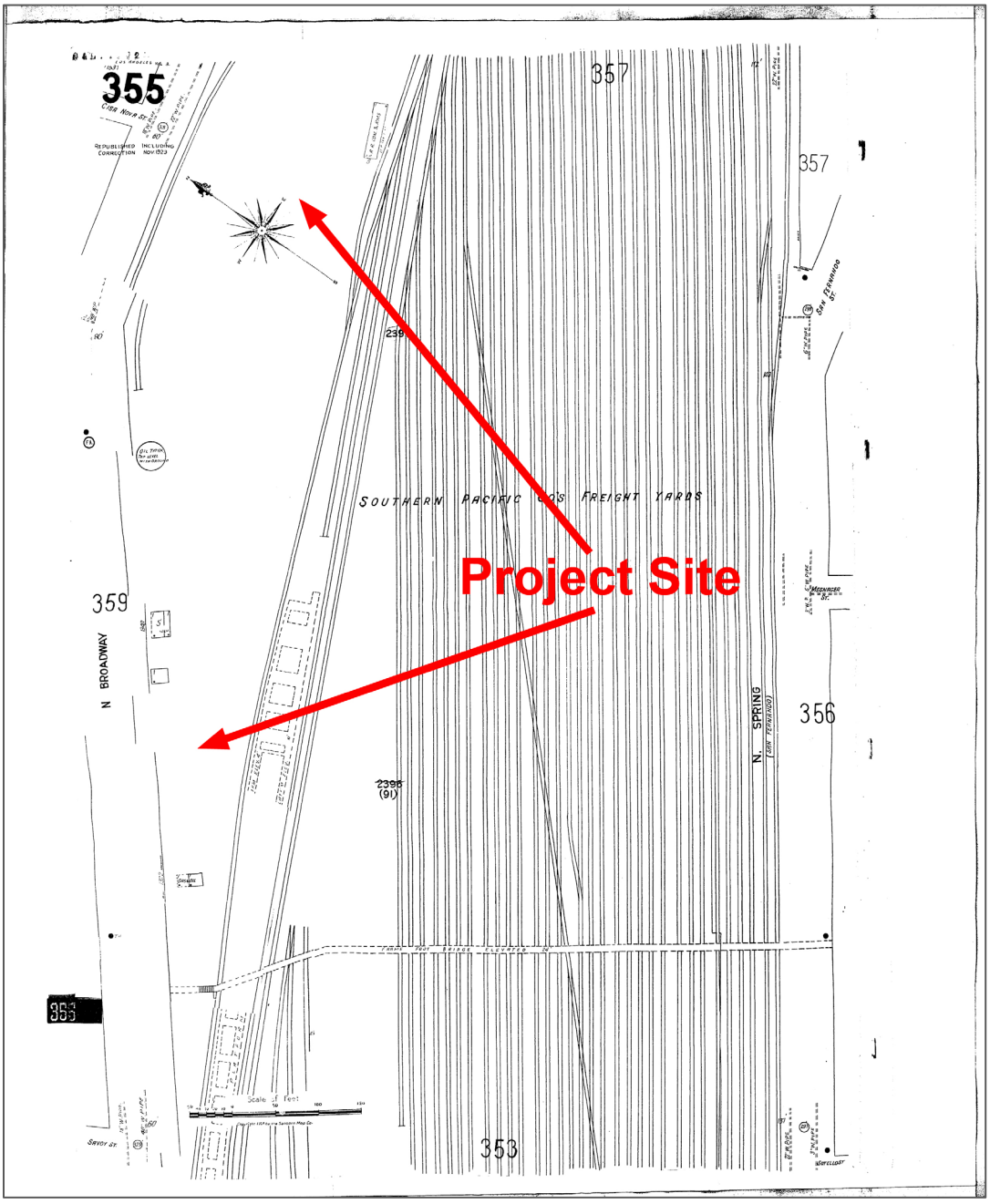
Sanborn fire insurance map, 1906. (Sanborn Map Co.)



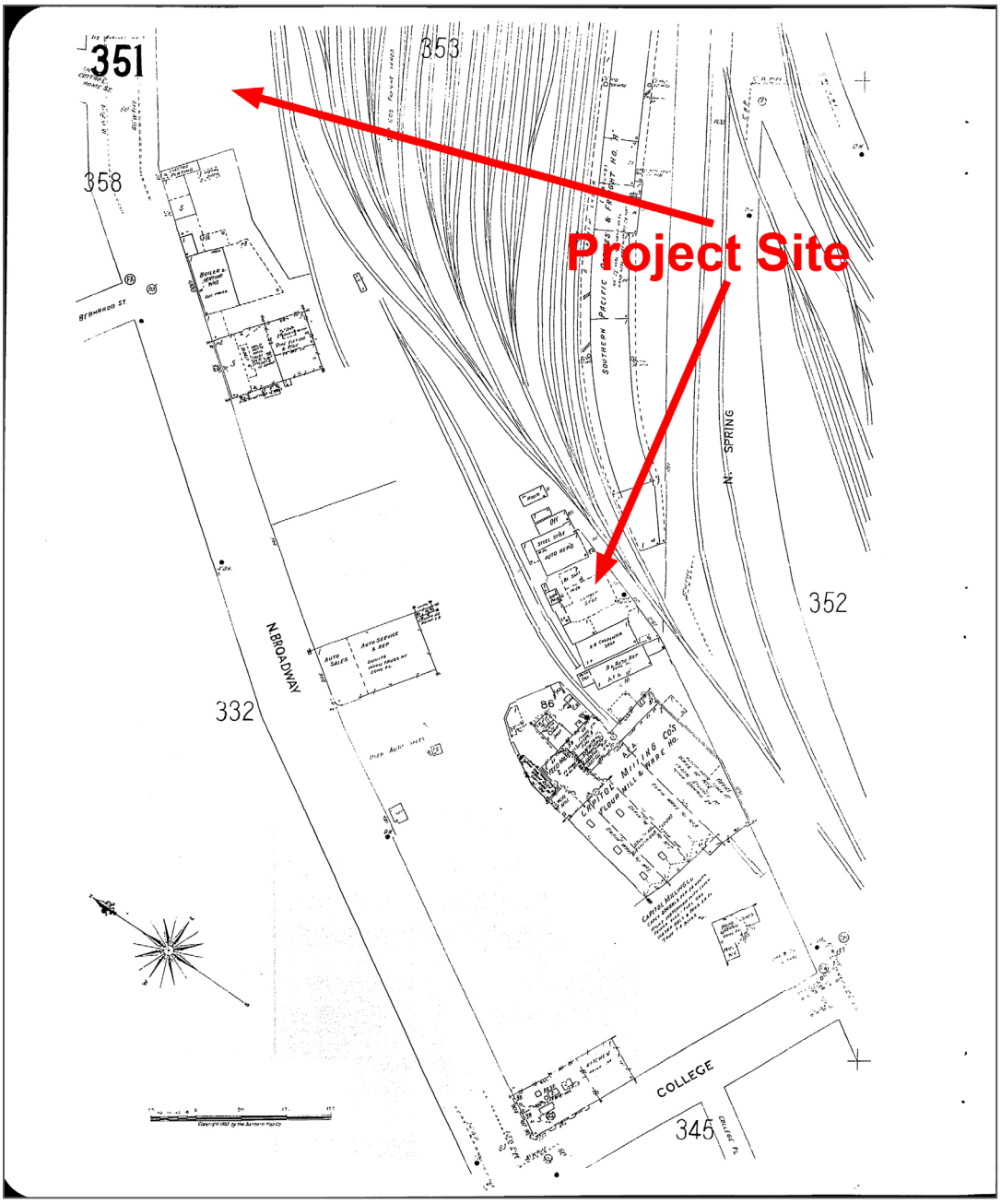
Sanborn fire insurance map, 1950. (Sanborn Map Co.)



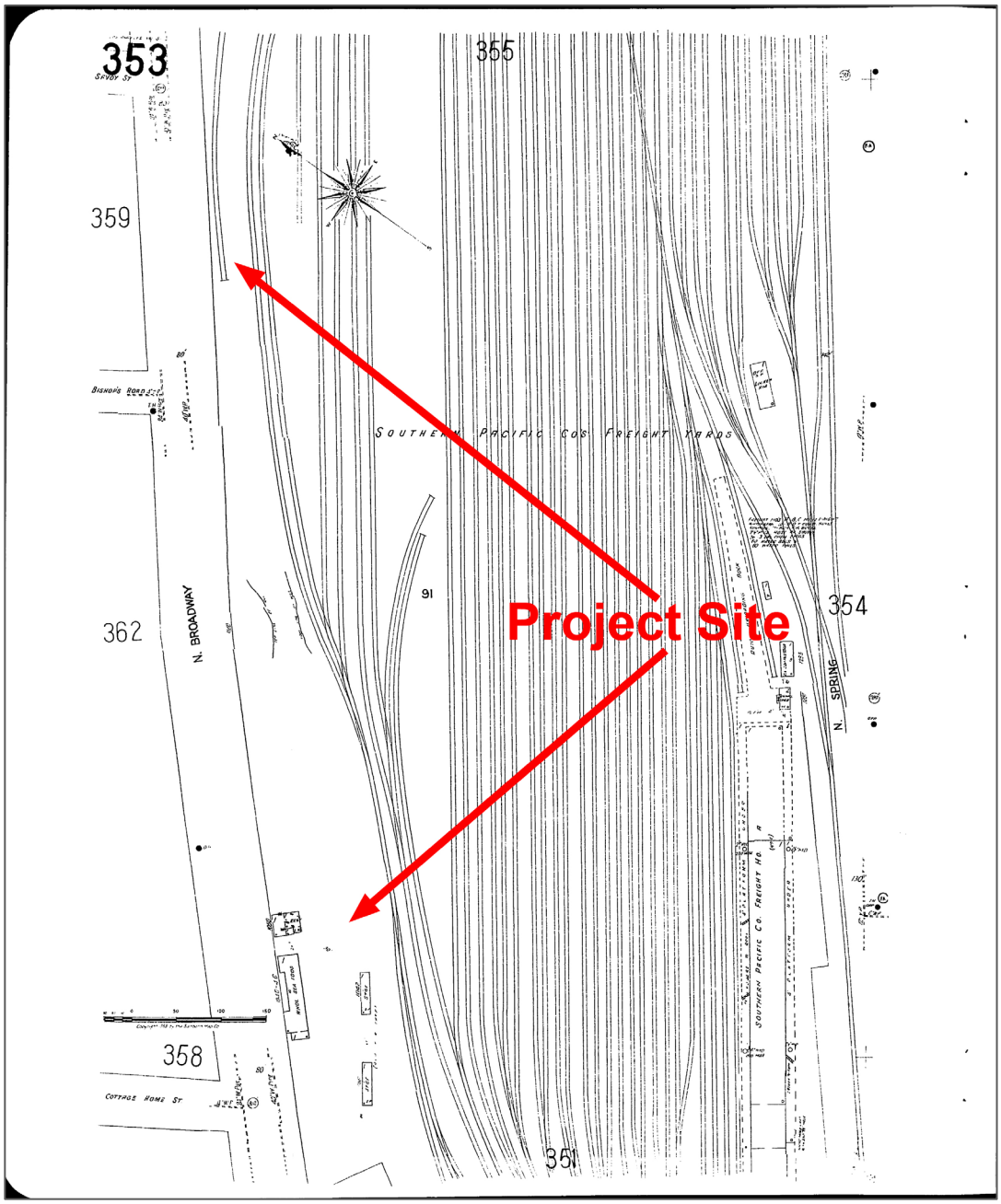
Sanborn fire insurance map, 1950. (Sanborn Map Co.)



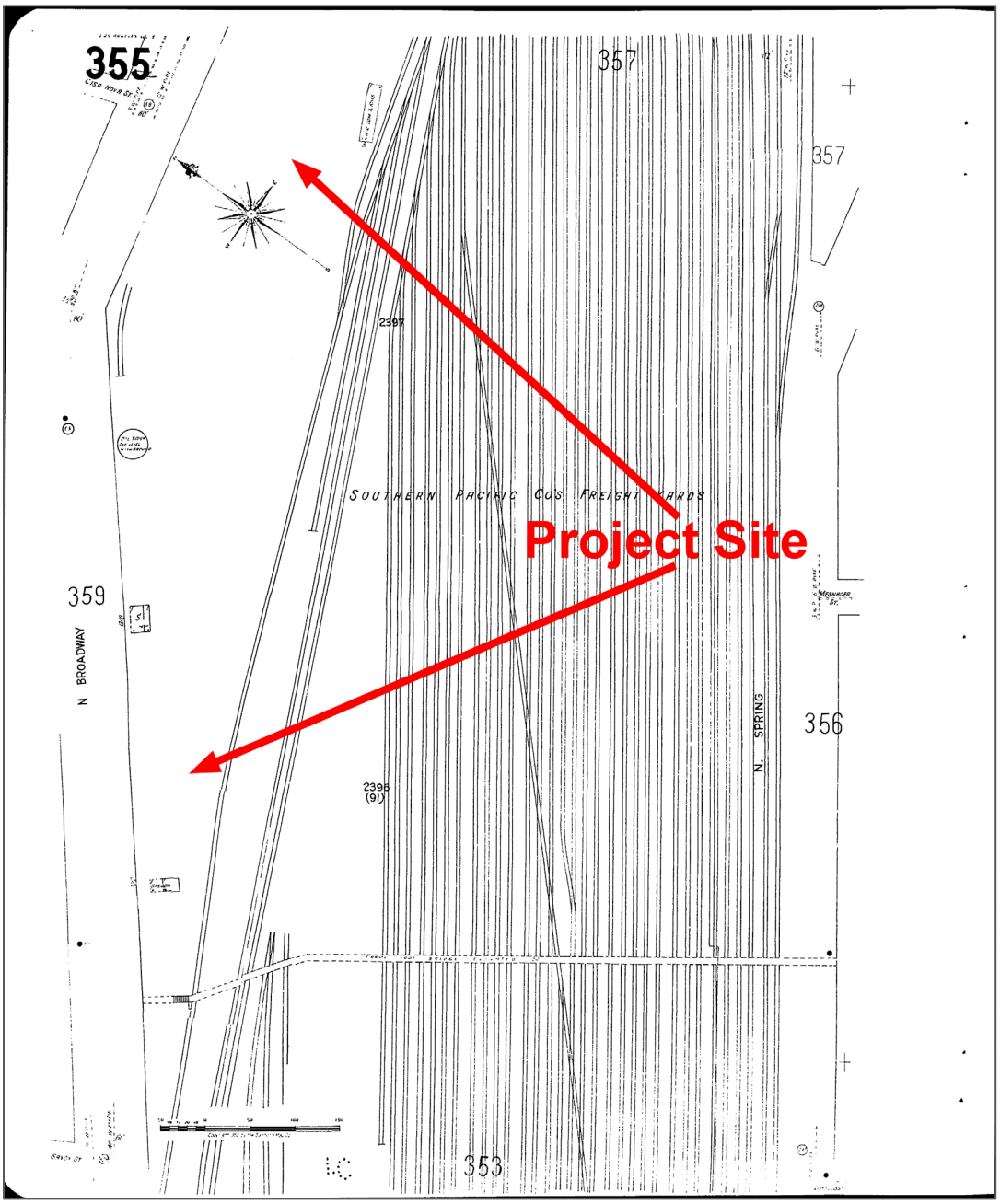
Sanborn fire insurance map, 1950. (Sanborn Map Co.)



Sanborn fire insurance map, 1953. (Sanborn Map Co.)

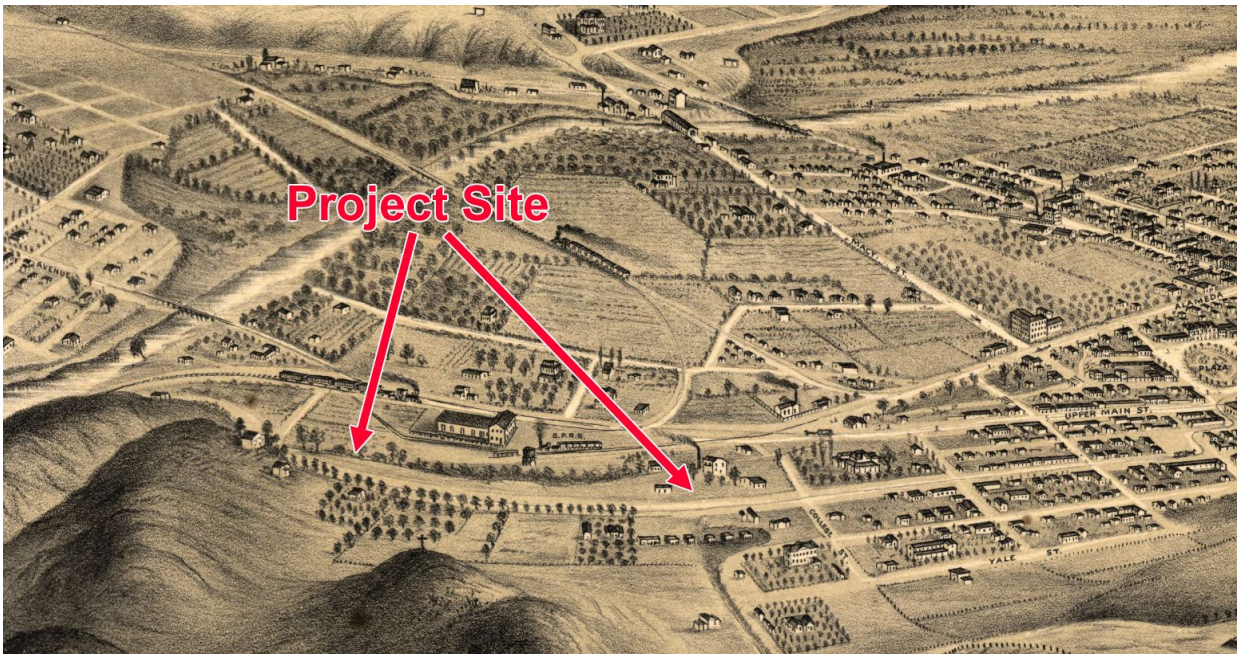


Sanborn fire insurance map, 1953. (Sanborn Map Co.)

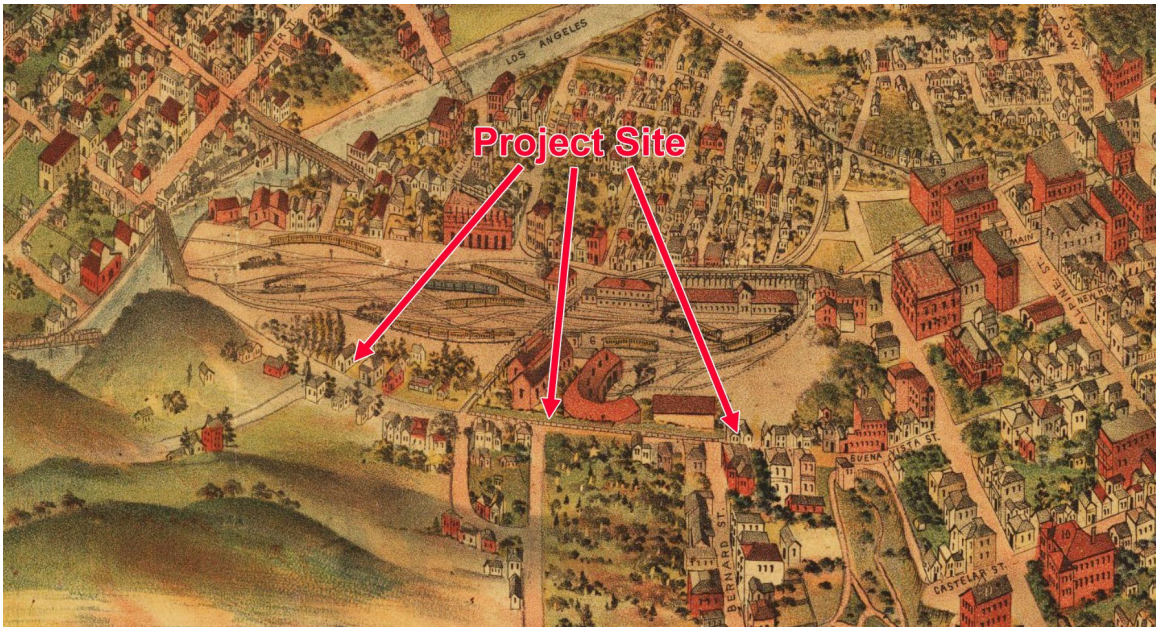


Sanborn fire insurance map, 1953. (Sanborn Map Co.)

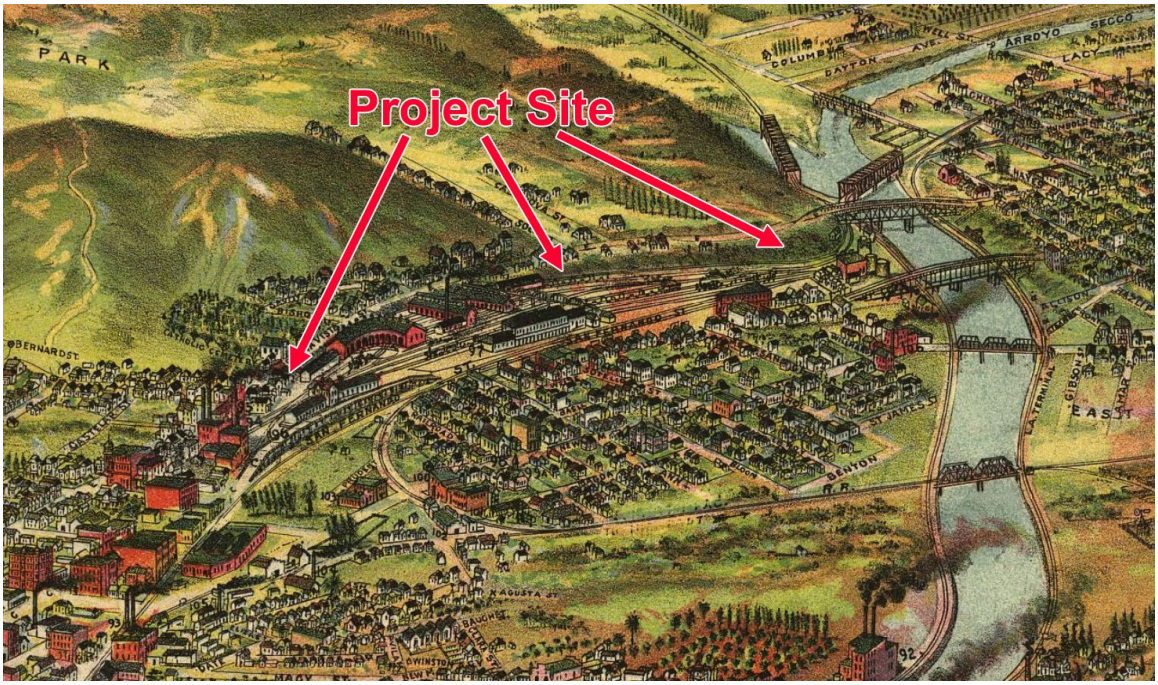
APPENDIX B: HISTORICAL PERSPECTIVE DRAWINGS



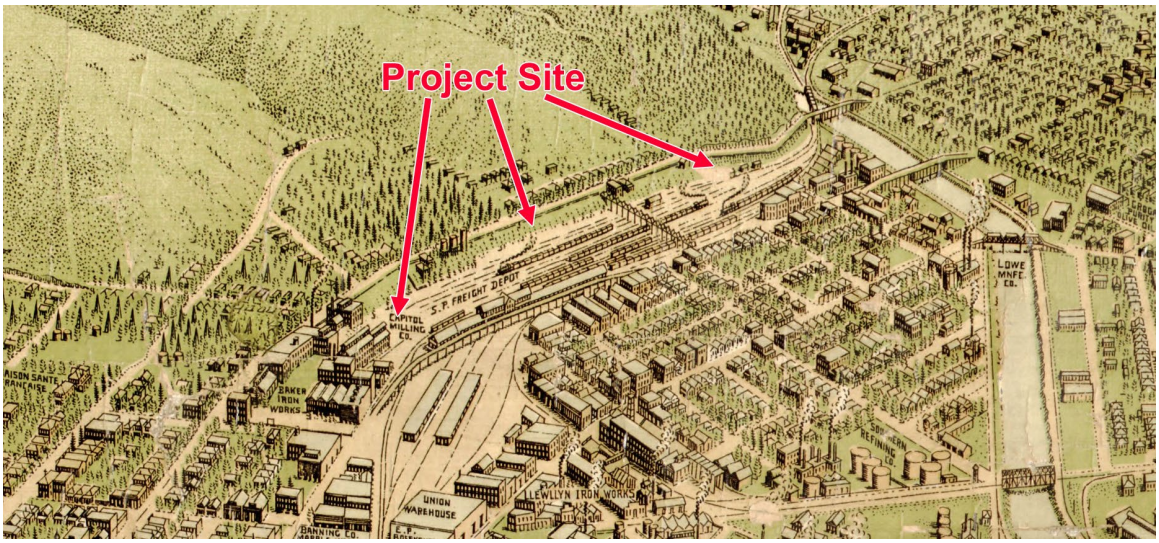
"Birds Eye View of Los Angeles, California, Looking South to the Pacific Ocean Twenty Miles Distant, 1877," detail. (Library of Congress)



"Los Angeles, Cal., Population of City and Environs 65, 00, 1891," detail. (Library of Congress)



"Los Angeles, California, as seen from the Electric Power House cor. Wilder St. and Central Ave. looking north, 1894," detail. (Library of Congress)

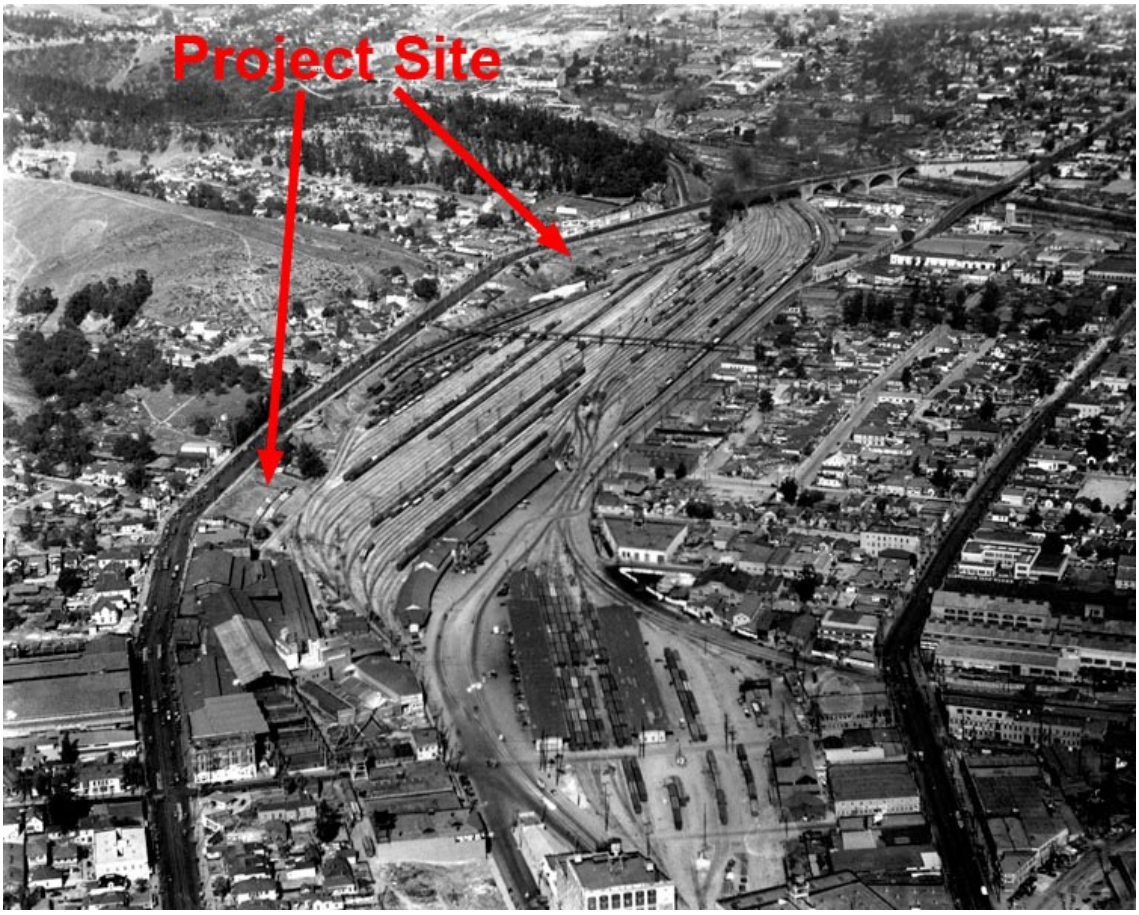


"Los Angeles, 1909," detail. (Library of Congress)

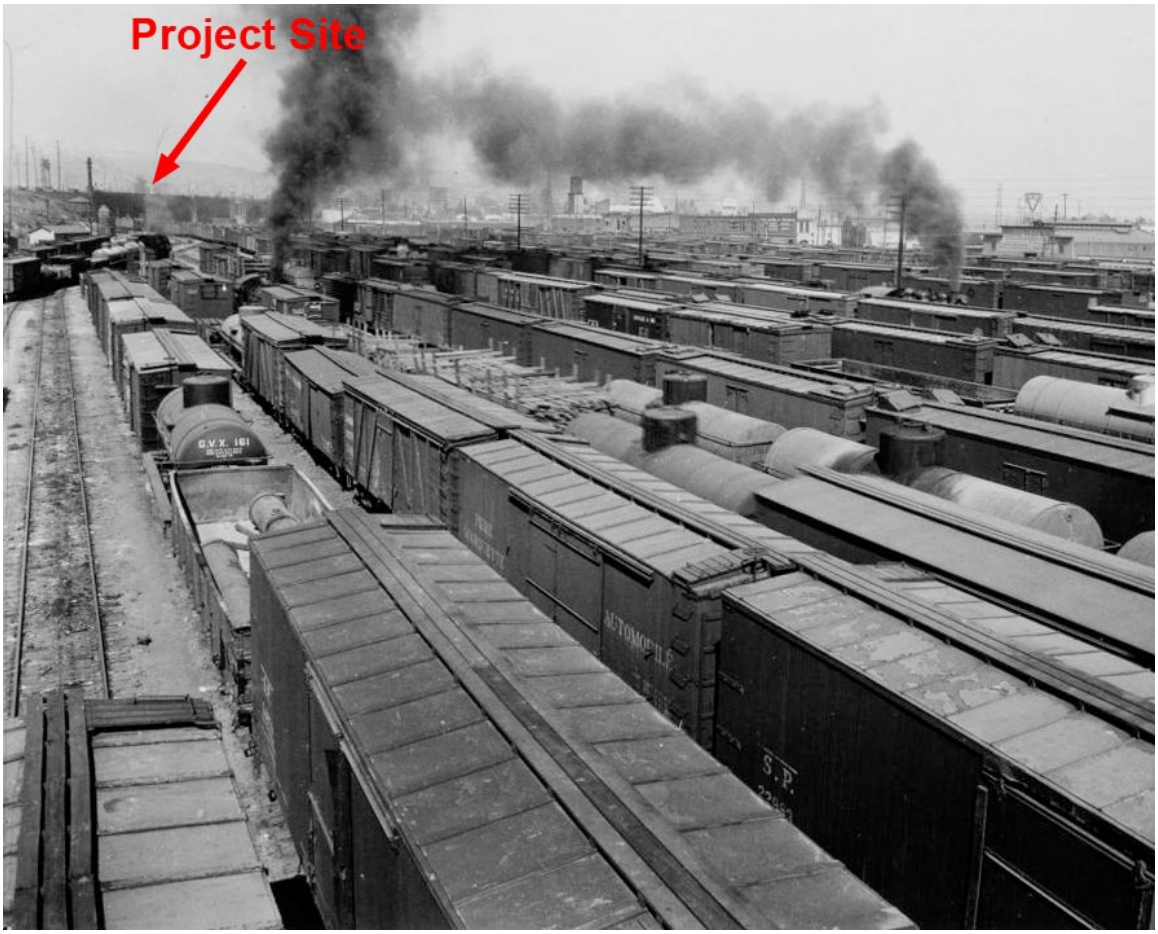
APPENDIX C: HISTORICAL PHOTOGRAPHS



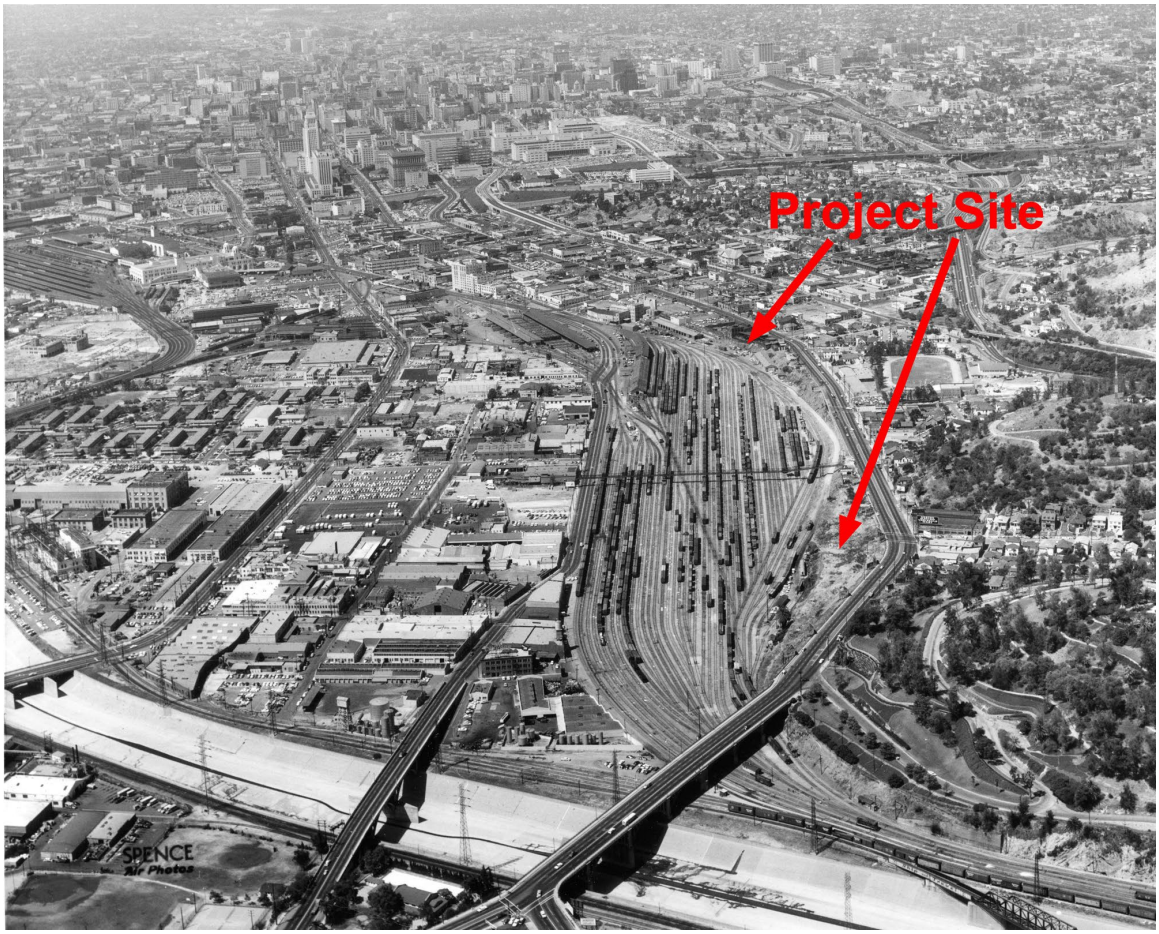
View of River Station from the Project Site, 1890s. (Floyd B. Bariscale Flickr page)



Aerial view of the Project Site and River Station, 1924. (Security Pacific National Bank Collection, Los Angeles Public Library)



River Station, 1930. (Digital Collections, University of Southern California)



Aerial view of Project Site and River Station, 1960. (Spence Collection, University of California, Los Angeles)



River Station, 1971. (Los Angeles Historic-Cultural Monument case file.)



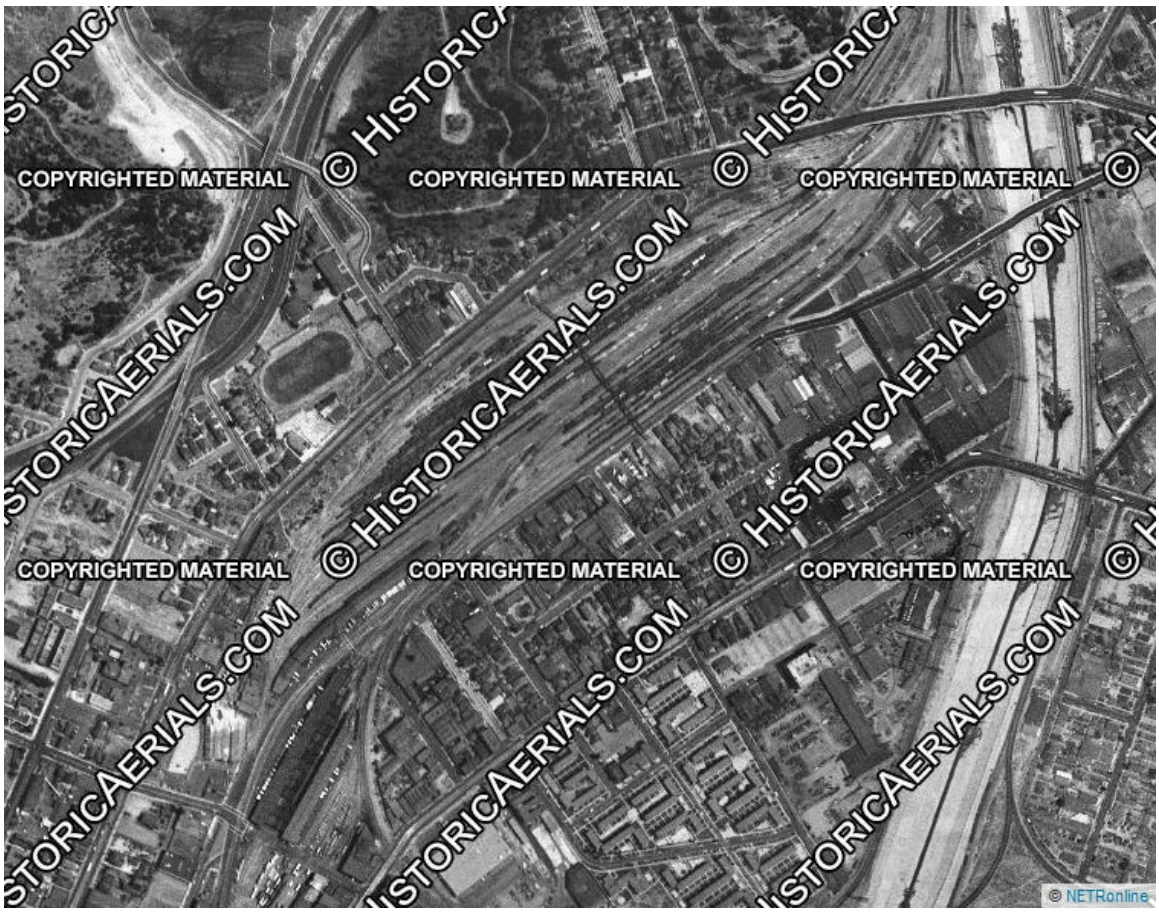
River Station, 1978. (Security Pacific National Bank Collection, Los Angeles Public Library)



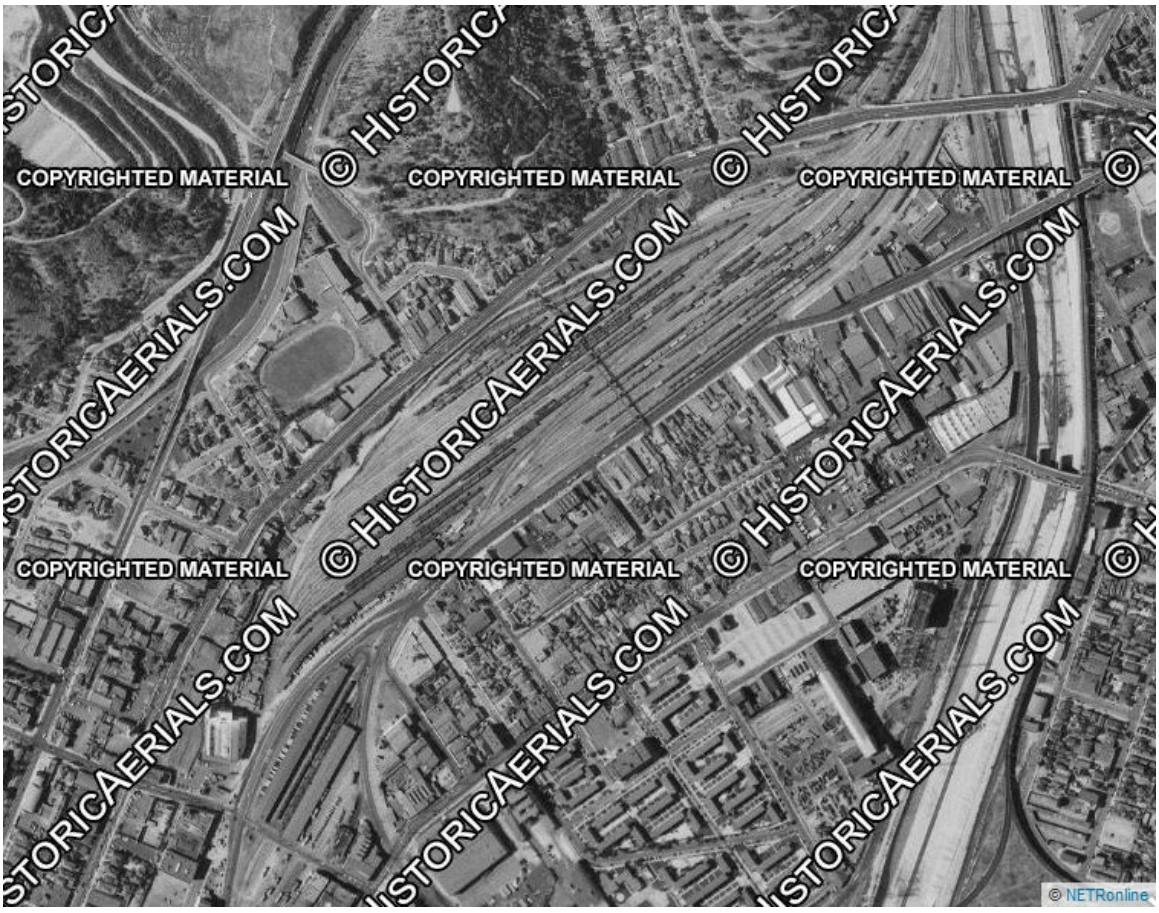
River Station, 1987. (William Reagh Collection, Los Angeles Public Library)

APPENDIX D: AERIAL PHOTOGRAPHS

APPENDIX D: HISTORICAL AERIALS



Historic aerial, 1948. (historicaerials.com)



Historic aerial, 1952. (historicaerials.com)



Historic aerial, 1964. (historicaerials.com)



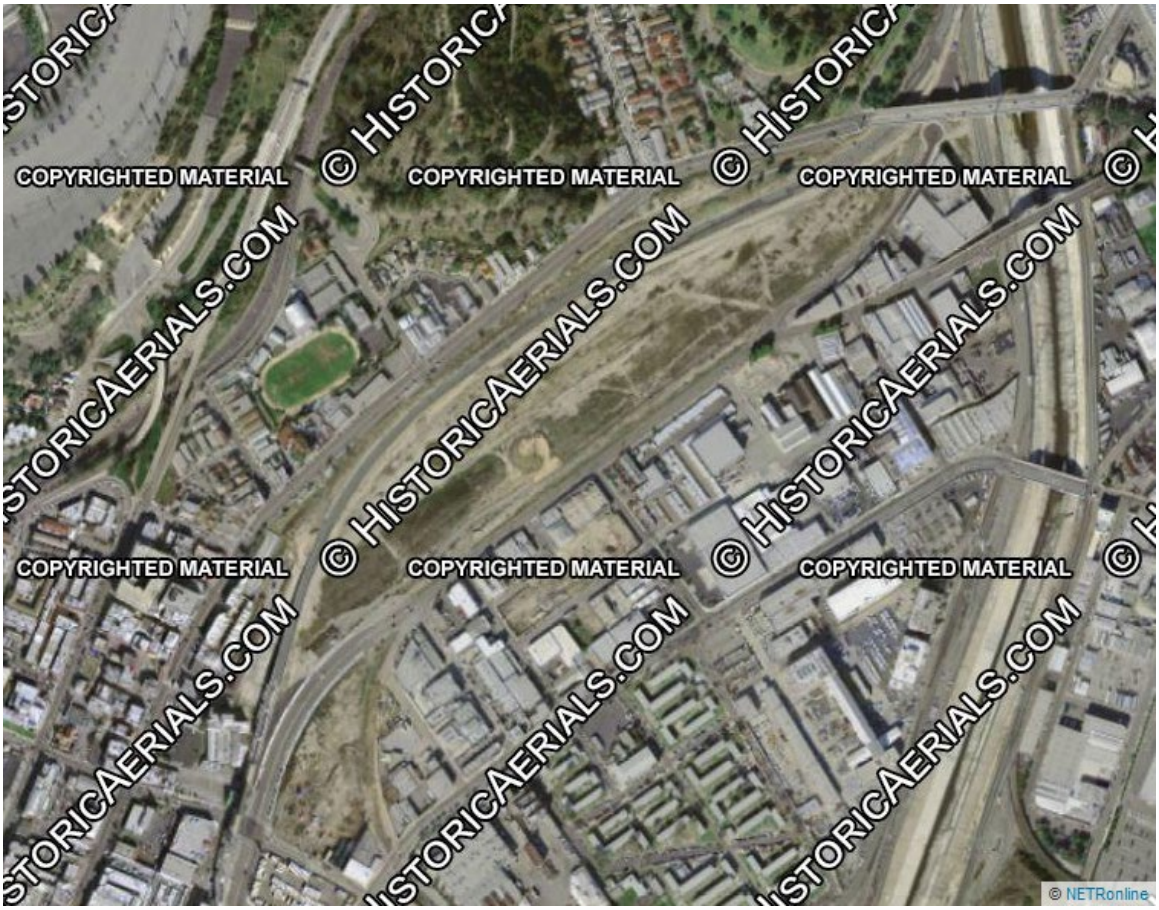
Historic aerial, 1972. (historicaerials.com)



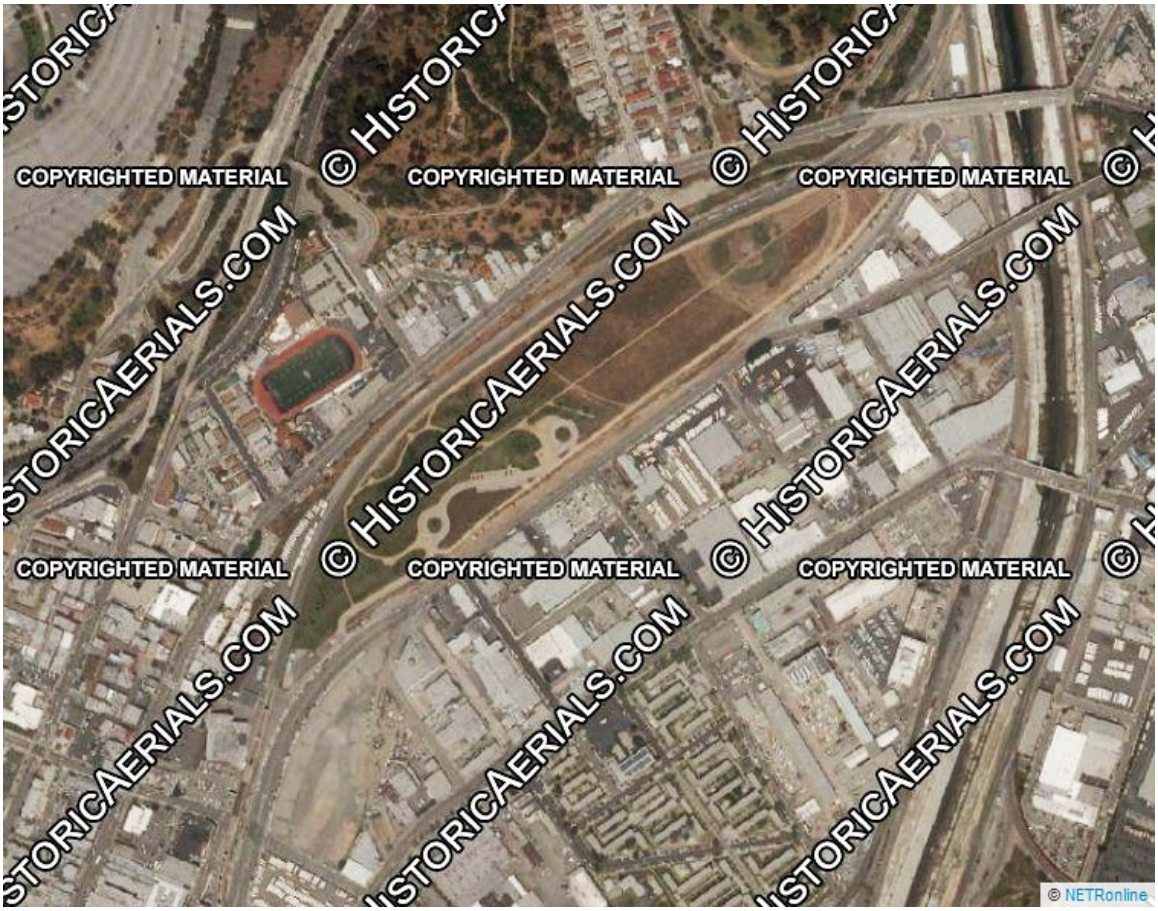
Historic aerial, 1980. (historicaerials.com)



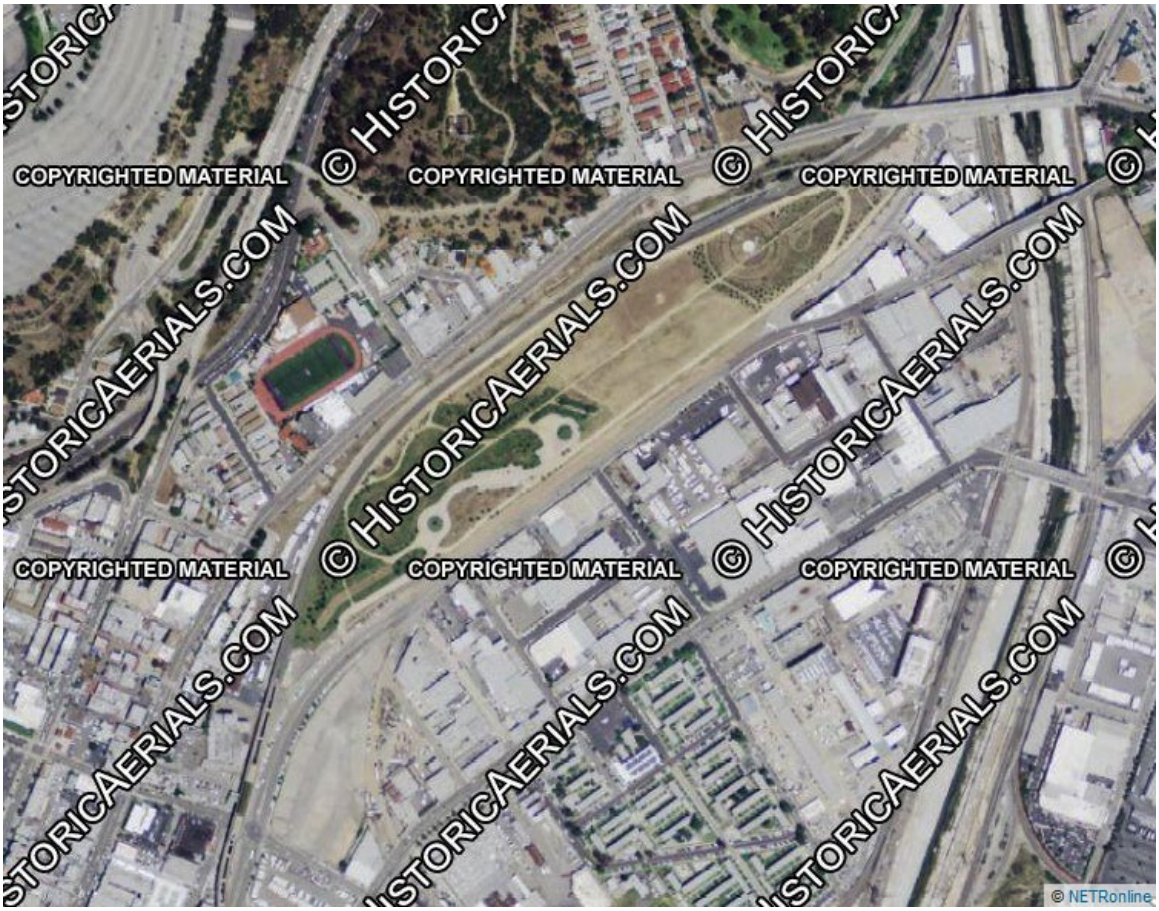
Historic aerial, 1994. (historicaerials.com)



Historic aerial, 2004. (historicaerials.com)



Historic aerial, 2010. (historicaerials.com)



Historic aerial, 2012. (historicaerials.com)

APPENDIX E: EXISTING CONDITIONS PHOTOGRAPHS

CONTEXT VIEWS



Context view from the Project Site, overlooking Los Angeles State Historic Park. (South view)



Context view from the Project Site, overlooking Los Angeles State Historic Park. (East view)



Context view from the Project Site, overlooking Los Angeles State Historic Park. (Southeast view)



Context view on N Broadway. (South view)



Context view on N Broadway, looking toward Chinatown. (North view)



Context view on N Broadway. (South view)



Context view on N Broadway. (Southwest view)



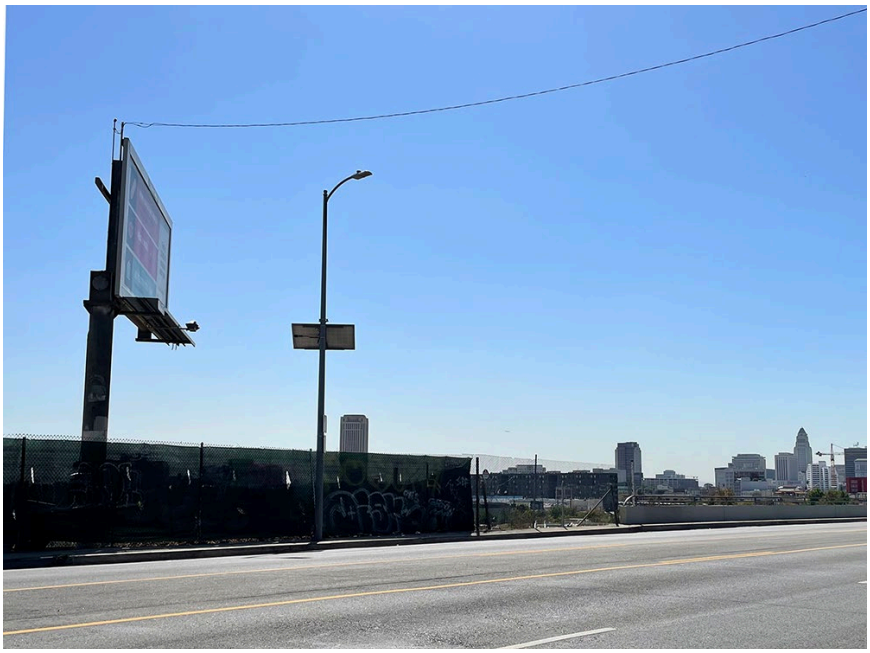
Context view on N Broadway. (North view)



Context view on N Broadway. (Southwest view)



Context view on N Broadway. (South view)



Context view on N Broadway. (South view)



Context view on N Broadway. (Southwest view)



Context view on N Broadway, toward Elysian Park and the Buena Vista Street Viaduct. (Northeast view)



View from the Los Angeles State Historic Park. (South view)



View from the Los Angeles State Historic Park. (North view)

FEATURES ON THE PROJECT SITE



Feature #1, Wayside Communications Office (no longer extant). (West view)



Feature #1, Wayside Communications Office (no longer extant). (Southwest view)



Feature #2, Vehicle shelter. (Northwest view)



Feature #2, Vehicle shelter. (Northeast view)



Feature #3, Southern Pacific Railroad Auto Repair Garage. (Northwest view)



Feature #3, Southern Pacific Railroad Auto Repair Garage. (North view)



Feature #4, Golden Dragon Rear Addition. (Southwest view)



Feature #4, Golden Dragon Rear Addition. (Northeast view)



Feature #5, Concrete foundations on grassy bluff. (Southwest view)



Feature #5, Concrete foundations on grassy bluff. (Southwest view)



Feature #6, Parking structure landing. (Southwest view)



Feature #6, Parking structure landing. (Southwest view)



Feature #7, Billboard A. (South view)



Feature #8, Foundation A. (Northwest view)



Feature #8, Foundation A. (South view)



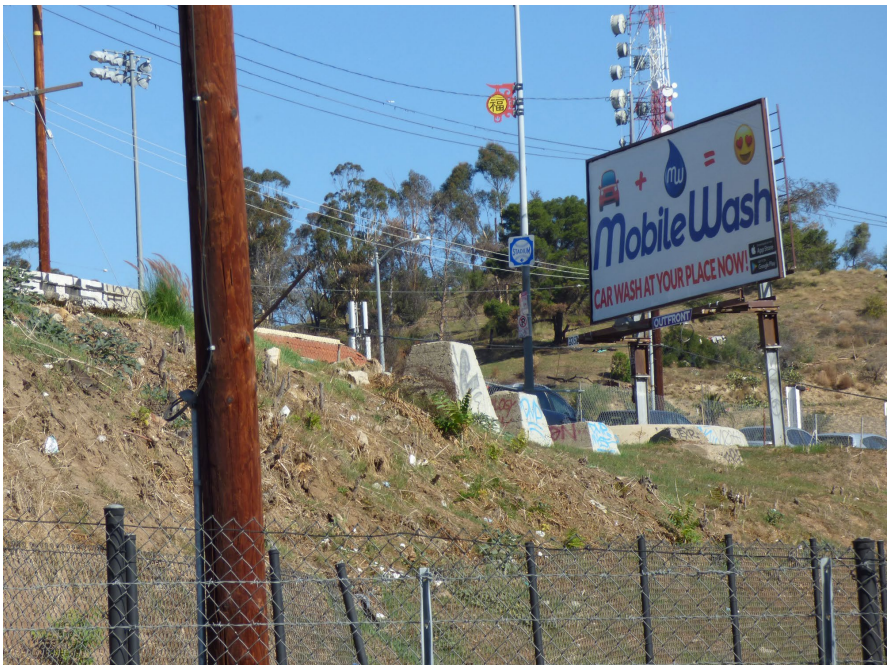
Feature #9, Foundation B. (North view)



Feature #9, Foundation B. (Southeast view)



Feature #10, Footings. (East view)



Feature #10, Footings. (North view)



Feature #11, Square Pit. (East view)



Feature #12, Round Tank. (South view)



Feature #12, Round Tank. (East view)



Feature #13, Billboard B. (Southeast view)



Feature #14, Billboard C. (Southeast view)



Feature #15, Billboard D. (West view)



Feature #16, Billboard E. (South view)



Feature #17, Guardrail. (South view)



Feature #17, Guardrail. (Northeast view)



Feature #18, Billboard F. (South view)



Feature #19, Billboard G. (Southeast view)



Feature #20, Foundation C. (East view)



Feature #20, Foundation C. (East view)



Feature #21, Billboard H. (South view)



Feature #22, Billboard I. (East view)



Feature #23, Billboard J. (South view)



Feature #24, Billboard K. (Southwest view)



Feature #25, Billboard L. (Southwest view)



Feature #26, Billboard M. (South view)

Properties within the Expanded Study Area



1253 N Bishops Road, Cathedral High School. (North view)



950 N Broadway. (Southeast view)



951 N Broadway (east building). (Northwest view)



951 N Broadway (west building). (Northeast view)



957 N Broadway, Bing Kong Tong Society of Los Angeles (Chinese Free Masons). (Northwest view)



960 N Broadway, Golden Dragon Restaurant. (Southeast view)



969 N Broadway, Phoenix Bakery. (North view)



977 N Broadway, Far East National Bank. (Northwest view)



978 N Broadway, Mandarin Plaza. (East view)



978 N Broadway, Mandarin Plaza parking structure. (East view)



989 N Broadway, Lung Kong Tin Yee Association. (West view)



993 N Broadway, Soo Yuen Fraternal Association. (Northwest view)



999 N Broadway, Royal Pagoda Motel. (Northwest view)



1001 N Broadway. (Northwest view)



1011 N Broadway. (Northwest view)



1029 N Broadway. (North view)



1031 N Broadway. (West view)



1039 N Broadway. (Northwest view)



1041 N Broadway, St. Peter's Italian Catholic Church. (Northwest view)



1041 N Broadway, "The Immigrants" Sculpture. (Northwest view)



1045 N Broadway, Casa Italiana. (North view)



1045 N Broadway, Replica of Lupa Capitolina" Statue. (North view)



1201 N Broadway. (North view)



1217-1221 N Broadway. (Northwest view)



1231 N Broadway, Li Hing of Hong Kong, Inc. (North view)



1301 N Broadway. (North view)



1305 N Broadway, Xuan Wu San Charity. (West view)



1311 N Broadway. (North view)



1319 N Broadway. (Northwest view)



1323 N Broadway. (North view)



1327 N Broadway. (North view)



1335 N Broadway. (Northwest view)



1349 Broadway, Quan Yum Temple. (West view)



1357 Broadway. (North view)



1373 N Broadway, Norton Electric Wholesale. (North view)



1401 N Broadway, Cordoba Corporation. (Northwest view)



1411 N Broadway. (Northwest view)



1415 N Broadway. (Northwest view)



1417 N Broadway. (North view)



1421 N Broadway. (Northwest view)



1425 N Broadway. (Northwest view)



1501-1511 N Broadway. (North view)



433 W Casanova Street, Casanova Garden Apartments. (Northwest view)



1231 N Spring Street, Capitol Milling Co. (West view)



1231 N Spring Street, Capitol Milling Co. (Southwest view)



1245 N Spring Street, Los Angeles State Historic Park. (South view)



1245 N Spring Street, Los Angeles State Historic Park. (Northeast view)



Elysian Park. (North view)



Elysian Park. (Northwest view)



Zanja Madre, exposed portion. (North view)



Zanja Madre, exposed portion. (North view)



Buena Vista Street Viaduct. (Northeast view)



Buena Vista Street Viaduct. (Northeast view)

APPENDIX F: SCCIC REPORT

Resource Detail: P-19-003120

Identifying information

Primary No.: P-19-003120

Trinomial: CA-LAN-003120H

Name: Los Angeles State Historic Park / River Station Area / Southern Pacific Railroad

Other IDs:

Type	*Name*
Resource Name	Los Angeles State Historic Park / River Station Area / Southern Pacific Railroad
Other	LAHCM #82
Other	Cornfield
Other	River Station

Cross-refs: Physically overlaps or intersects 19-174919

Attributes

Resource type: Structure, Object, Site

Age: Historic

Information base: Testing, Excavation, Analysis, Other

Attribute codes: AH02 (Foundations/structure pads); AH03 (Landscaping/orchard); AH04 (Privies/dumps/trash scatters); AH07 (Roads/trails/railroad grades); AH11 (Walls/fences); HP08 (Industrial building); HP11 (Engineering structure); HP17 (Railroad depot)

Disclosure: Not for publication

Collections: Yes

Accession no(s):

Facility:

General notes

Recording events

Date	*Recorder(s)*	*Affiliation*	*Notes*
3/4/2003	Peter Messick	Greenwood & Assoc.	
10/6/2010	Michael Sampson and Mary Garrett	State of Calif., Dept of Parks & Rec.	Update

Associated reports

Report No.	*Year*	*Title*	*Affiliation*
LA-06335	2003	Archaeological Monitor Report Historic Cornfield Railroad Yard	Greenwood and Associates
LA-08531	2004	Archaeological Monitor Report: Emergency Sewer Repair, North Spring Street Between Elmyra and Mesnager Streets, Los Angeles, California	Greenwood and Associates
LA-11141	2003	Positive Archaeological Survey Report Plaza Substation Transportation Museum El Pueblo de Los Angeles, California	Greenwood and Associates
LA-11404	2011	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

Location information

County: Los Angeles

USGS quad(s): LOS ANGELES

Address:

Address	*City*	*Assessor's parcel no.*	*Zip code*
1245 N. Spring Street	Los Angeles		90012

PLSS:

UTMs:

Management status

Resource Detail: P-19-003120

Database record metadata

	Date	User	
Entered:	5/1/2008	jay	
Last modified:	8/22/2012	mgalaz	
IC actions:	*Date*	*User*	*Action taken*
	5/1/2008	jay	Appended records from Encodent database.
	10/19/201	mgalaz	Updated.
Record status:			

Resource Detail: P-19-003650

Identifying information

Primary No.: P-19-003650
Trinomial: CA-LAN-003650H
Name: Bovinae Cranial Fragments
Other IDs:

Type	Name
Resource Name	Bovinae Cranial Fragments
Other	S-2005LMM1004

Cross-refs:

Attributes

Resource type: Site
Age: Historic
Information base:
Attribute codes: AH04 (Privies/dumps/trash scatters)
Disclosure: Not for publication
Collections: Yes
Accession no(s):
Facility:

General notes

Recording events

Date	Recorder(s)	Affiliation	Notes
10/4/2005	Leann Moore	Cogstone Resource Management	

Associated reports

Report No.	Year	Title	Affiliation
LA-11404	2011	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

Location information

County: Los Angeles
USGS quad(s): LOS ANGELES
Address:

Address	City	Assessor's parcel no.	Zip code
	Los Angeles		

PLSS:
UTMs:

Management status

Database record metadata

	Date	User
Entered:	5/1/2008	jay
Last modified:	9/18/2012	mgalaz

IC actions:

Date	User	Action taken
5/1/2008	jay	Appended records from Encodent database.

Record status:

Resource Detail: P-19-190309

Identifying information

Primary No.: P-19-190309
Trinomial:
Name: Zanja Madre
Other IDs:

Type	*Name*
OHP Property Numb	172542
Resource Name	Zanja Madre

Cross-refs: See also 19-003103

Attributes

Resource type: Structure
Age: Historic
Information base: Other
Attribute codes: AH06 (Water conveyance system)
Disclosure:
Collections:
Accession no(s):
Facility:

General notes

Recording events

Date	*Recorder(s)*	*Affiliation*	*Notes*
7/30/2008	Christeen Taniguchi	Galvin Preservation Associates	
4/15/2014	Carren Jao	KCET	article.

Associated reports

Report No.	*Year*	*Title*	*Affiliation*
LA-12808	2014	Cultural Resources Study of the Wilmington Oil and Gas Field, Los Angeles County, California in Support of Analysis of Oil and Gas Well Stimulation Treatments in California Environmental Impact Report	Applied EarthWorks
LA-13239	2017	Extent of Zanja Madre	Cogstone

Location information

County: Los Angeles
USGS quad(s): LOS ANGELES
Address:

Address	*City*	*Assessor's parcel no.*	*Zip code*
Broadway and Bishops Rd	Los Angeles		

PLSS:
UTMs:

Management status

Database record metadata

	Date	*User*
Entered:	4/10/2013	mgalaz
Last modified:	4/21/2014	mgalaz

IC actions:

Date	*User*	*Action taken*
4/21/2014	mgalaz	Updated

Record status:

Report Detail: LA-03497

Identifiers

Report No.: LA-03497
Other IDs:
Cross-refs:

Citation information

Author(s): Anonymous
Year: 1994
Title: Draft Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project
Affliliation: Tetra Tech, Inc.
No. pages: 24
No. maps:
Attributes: Management/planning
Inventory size: unknown
Disclosure: Not for publication
Collections: No

General notes

Mapped to LA-4386 and railroad tracks marked on USGS quad maps.

Associated resources

No. resources: 0
Has informals:

Location information

County(ies): Los Angeles
USGS quad(s): LOS ANGELES, MT WILSON, PASADENA
Address:
PLSS:

Database record metadata

	Date	*User*	
Entered:	5/5/2008	jay	
Last modified:	2/26/2013	agarcia	
IC actions:	*Date*	*User*	*Action taken*
	5/6/2008	jay	Appended records from old Surveys database.
	2/26/2013	agarcia	Data updated, mapped and removed from unmappable folder.

Record status:

Report Detail: LA-03498

Identifiers

Report No.: LA-03498
Other IDs:
Cross-refs:

Citation information

Author(s): Anonymous
Year: 1994
Title: Final Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project
Affliliation: Tetra Tech, Inc.
No. pages: 243
No. maps:
Attributes: Management/planning
Inventory size: unknown
Disclosure: Not for publication
Collections: No

General notes

Mapped to LA-4386 and railroad tracks marked on USGS quad maps.

Associated resources

No. resources: 0
Has informals:

Location information

County(ies): Los Angeles
USGS quad(s): LOS ANGELES, MT WILSON, PASADENA
Address:
PLSS:

Database record metadata

	Date	*User*
Entered:	5/5/2008	jay
Last modified:	2/26/2013	agarcia

IC actions:

Date	*User*	*Action taken*
5/6/2008	jay	Appended records from old Surveys database.
2/26/2013	agarcia	Data updated, mapped and removed from unmappable folder.

Record status:

Report Detail: LA-04386

Identifiers

Report No.: LA-04386
Other IDs:
Cross-refs:

Citation information

Author(s): Anonymous
Year: 1993
Title: Cultural Resources Overview Los Angeles County Metropolitan Transportation Authority's Interstate Commerce Commission Abandonment Exemption Pasadena-Los Angeles Light Rail Transit Project
Affliliation: Caltrans
No. pages:
No. maps:
Attributes: Architectural/historical
Inventory size: Unknown
Disclosure:
Collections:

General notes

Associated resources

No. resources: 0
Has informals:

Location information

County(ies): Los Angeles
USGS quad(s): LOS ANGELES
Address:
PLSS:

Database record metadata

	Date	*User*	
Entered:	5/5/2008	jay	
Last modified:	2/26/2013	agarcia	
IC actions:	*Date*	*User*	*Action taken*
	5/6/2008	jay	Appended records from old Surveys database.

Record status:

Report Detail: LA-06335

Identifiers

Report No.: LA-06335
Other IDs:
Cross-refs:

Citation information

Author(s): Messick, Peter, Greenwood, Roberta S., and Alice Hale
Year: 2003
Title: Archaeological Monitor Report Historic Cornfield Railroad Yard
Affliliation: Greenwood and Associates
No. pages: 25
No. maps:
Attributes: Monitoring, Other research
Inventory size: 32 ac
Disclosure:
Collections:

General notes

Railroad is city historical landmark and CA State Historical Landmark (No. 655) Portola Campsite No. 1

Associated resources

Primary No.	*Trinomial*	*Name*
P-19-003120	CA-LAN-003120H	Los Angeles State Historic Park

No. resources: 1
Has informals:

Location information

County(ies): Los Angeles
USGS quad(s): LOS ANGELES
Address:
PLSS:

Database record metadata

	Date	*User*
Entered:	5/5/2008	jay
Last modified:	8/7/2014	agarcia

IC actions:	*Date*	*User*	*Action taken*
	5/6/2008	jay	Appended records from old Surveys database.

Record status:

Report Detail: LA-06336

Identifiers

Report No.: LA-06336
Other IDs:
Cross-refs:

Citation information

Author(s): Foster, John M.
Year: 2002
Title: Archaeological Inventory for Soil Remediation Cornfield Rail Yard Project City of Los Angeles, California
Affliliation: Greenwood and Associates
No. pages: 14
No. maps:
Attributes: Excavation
Inventory size: 32 ac
Disclosure:
Collections:

General notes

Associated resources

No. resources: 0
Has informals:

Location information

County(ies): Los Angeles
USGS quad(s): LOS ANGELES
Address:
PLSS:

Database record metadata

	Date	*User*
Entered:	5/5/2008	jay
Last modified:	8/7/2014	agarcia

IC actions:	*Date*	*User*	*Action taken*
	5/6/2008	jay	Appended records from old Surveys database.

Record status:

Report Detail: LA-06360

Identifiers

Report No.: LA-06360
Other IDs:
Cross-refs:

Citation information

Author(s): Dewitt, John
Year: 2000
Title: City of Los Angeles/cornfields Site Eda Grant Application
Affliliation: City of Los Angeles
No. pages: 20
No. maps:
Attributes: Management/planning
Inventory size: 32 ac
Disclosure:
Collections:

General notes

Associated resources

No. resources: 0
Has informals:

Location information

County(ies): Los Angeles
USGS quad(s): LOS ANGELES
Address:
PLSS:

Database record metadata

	Date	*User*	
Entered:	5/5/2008	jay	
Last modified:	8/7/2014	agarcia	
IC actions:	*Date*	*User*	*Action taken*
	5/6/2008	jay	Appended records from old Surveys database.

Record status:

Report Detail: LA-08512

Identifiers

Report No.: LA-08512
Other IDs:
Cross-refs:

Citation information

Author(s): Gust, Sherri and Mari Pritchard Parker
Year: 2004
Title: Relationship of the Zanja Madre to Mta's Gold Line Property in River Station Yard, City of Los Angeles
Affliliation: Cogstone Resource Management, Inc.
No. pages:
No. maps:
Attributes: Archaeological, Field study
Inventory size: 3 ac
Disclosure:
Collections:

General notes

Associated resources

Primary No.	*Trinomial*	*Name*
P-19-003100	CA-LAN-003100H	NS1 Hisotirc Artifact Scatter
P-19-003101	CA-LAN-003101H	NS2 Historic Artifact Scatter
P-19-003102	CA-LAN-003102H	NS3 Brick Wall/Foundation and
P-19-003103	CA-LAN-003103H	Zanja Madre (Water Conveyanc

No. resources: 4
Has informals:

Location information

County(ies): Los Angeles
USGS quad(s): LOS ANGELES
Address:
PLSS:

Database record metadata

	Date	*User*
Entered:	5/5/2008	jay
Last modified:		

IC actions:	*Date*	*User*	*Action taken*
	5/6/2008	jay	Appended records from old Surveys database.

Record status:

Report Detail: LA-10773

Identifiers

Report No.: LA-10773
Other IDs:
Cross-refs:

Citation information

Author(s): Keck, David
Year: 2005
Title: Los Angeles State Historic Park General Plan and Final Environmental Impact Report
Affliliation: ESA
No. pages: 311
No. maps:
Attributes: Management/planning
Inventory size:
Disclosure: Not for publication
Collections: No

General notes

Associated resources

No. resources: 0
Has informals:

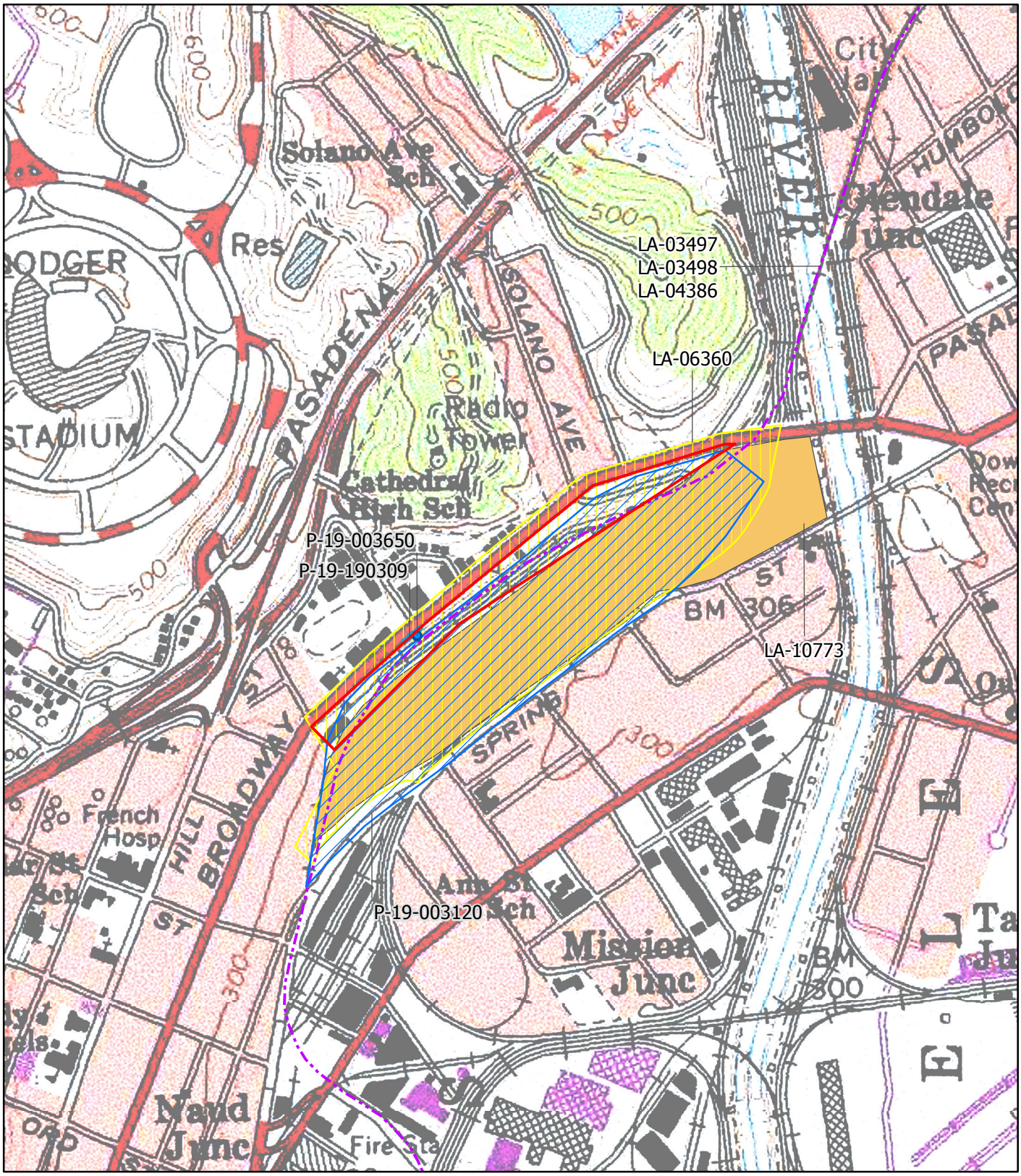
Location information

County(ies): Los Angeles
USGS quad(s): LOS ANGELES
Address:
PLSS:

Database record metadata

	Date	*User*
Entered:	1/12/2011	agarcia
Last modified:	8/7/2014	agarcia

IC actions:
Record status:



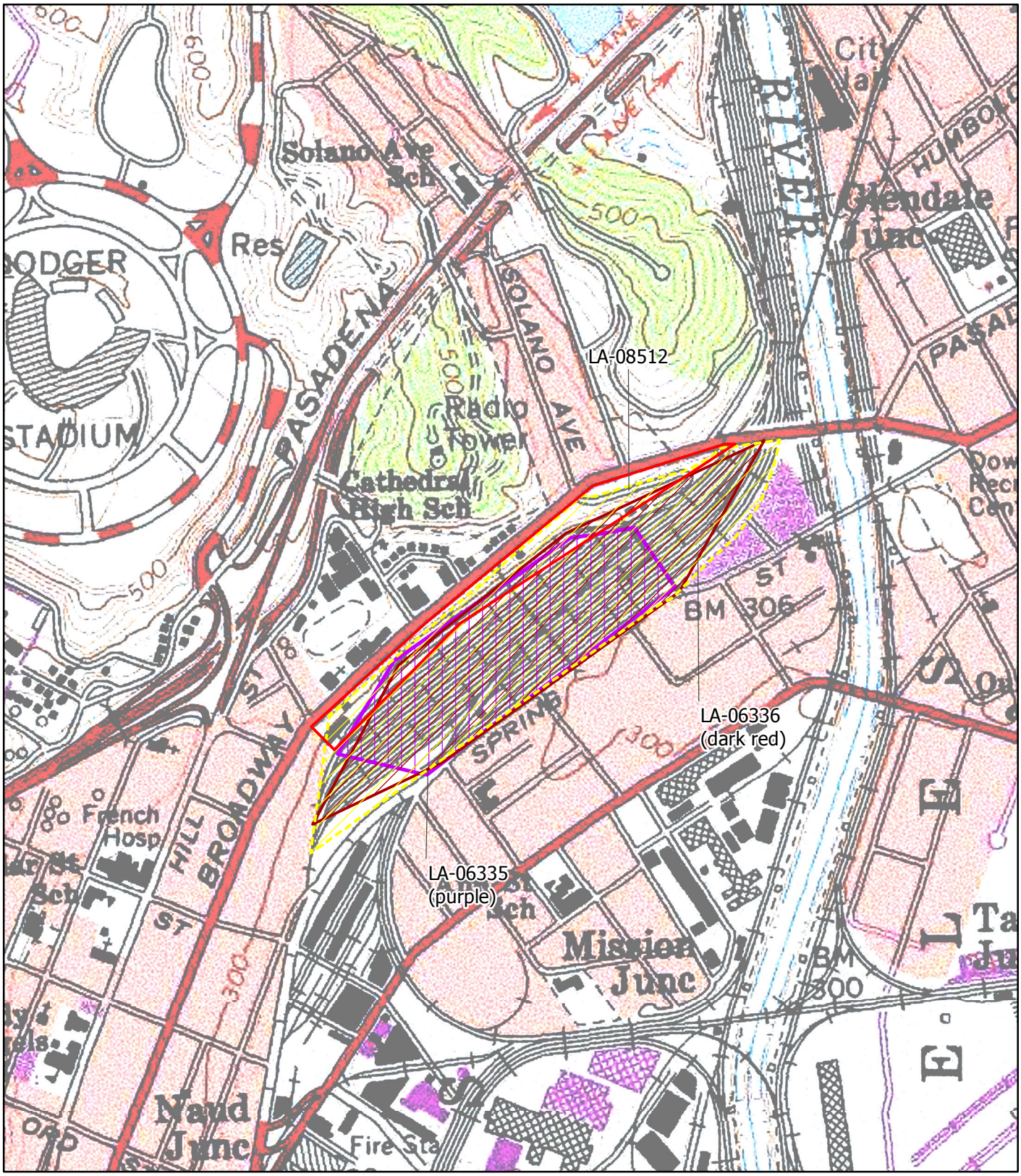
N
W E
S
Miles
0 0.05 0.1 0.2

Resources within project area: P-19-003120, P-19-003650, P-19-190309
Reports within project area: LA-06360, LA-10773

Los Angeles, CA
USGS 7.5'
PR: 1981 1:10,000
INV #18154
Oct 2017

South Central Coastal Information Center

May depict confidential cultural resource locations. Do not distribute.



N
W E
S

Miles
0 0.05 0.1 0.2

Resources within project area: None
Reports within project area: LA-06335, LA-06336, LA-08512

Los Angeles, CA
USGS 7.5'
PR: 1981 1:10,000
INV #18154
Oct 2017

South Central Coastal Information Center

May depict confidential cultural resource locations. Do not distribute.

19-003120

State of California The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code

Other Listings City of Los Angeles Historic-Cultural Monument #82. State Landmark 655.
Review Code **Reviewer** **Date**

 ***Resource Name or #:** Cornfield/River Station

P1. Other Identifier: City of Los Angeles Historical Cultural Monument #82, River Station Area/Southern Pacific Railroad
***P2. Location:** ___ **Not for Publication** x **Unrestricted** ***a. County:** Los Angeles
***b. USGS 7.5' Quad:** Los Angeles **Date:** 1966 **T** 7S ;**R** 8W; N.A. ¼ **of** N.A. ¼ of Sec. Unsectioned; San Bernardino **B.M.**
c. Address: 1245 N. Spring Street **City:** Los Angeles **Zip:** 90012
d. UTM: Zone: 11; A. 11386089 mE/ 3770065 mN; B. 11386601 mE/ 3770488 mN; C. 11386853 mE/ 3770577 mN; D. 11386948 mE/3770541mN; E. 11386766 mE/3770317mN; and F. 386067 mE/3769797 mN.
e. Other Locational Data: The parcel, oriented to the northeast-southwest with a broad mid-section and narrow ends, is bounded by North Spring Street on the southeast, the Los Angeles River on the east, and North Broadway on north and west. Elevations: Between 298.50 and 307.88 ASL.

***P3a. Description:**

Historical cultural resources– brick and mortar foundations, brick and mortar piers, concrete footings, railroad tracks and ties, and artifacts associated with the Southern Pacific Railroad Yard. Discovered during soil remediation monitoring, the 32-acre parcel contains architectural elements in the form of structural remains associated with the roundhouse, forge and/or machine shops, depot, and hotel. The following soil remediation "zones" or grids and associated resources are described:

G-34– An area 35' x 45' contained brick and mortar foundations labeled A-E exposed at ~13" below grade; running north-south ~34' with a pronounced curvature, Foundation A continues into both sidewalls of the grid; an exposed section was eight courses in height varying in width between 17" at the top and 37" at the bottom. Similar construction is seen with Foundations B-D, westward laterals connected to Foundation A. The bricks on each side of the foundations are stepped out row by row. Concrete footings 12" wide x 24" long x 24" deep were poured in place at the interface of Foundations B and C with Foundation A. Impressions from the base of square I-beams, 6" x 6" were observed on top. A small trough-like feature, 16" wide x 3' long, composed of brick and mortar, was exposed on top of Foundation A. These structural remains are probably associated with the railroad roundhouse.

G-36– An area 66' x 45' exposed brick and mortar Foundation A and 8 brick and mortar piers, B-I, less than 12" below surface. Two piers, C and D, had associated concrete footings. Foundation A, ~10' which was exposed, was originally 9 courses (24" in height), with only the five bottom rows presently intact. Measuring 17" wide at the top, the base measures at least 29" in width, with only the west side having been fully exposed. The piers varied in size and construction, with some tops square (13" x 13"), others rectangular (13" x 17.25"). Both the red brick piers and foundation appeared in alignment, and their angle suggests probable association with the roundhouse.

G-42– In an area of 45' x 40', a rectangular brick and mortar base of a structure was exposed at ~22.75" below surface. A minimum of 8 feet wide x 11+ feet long (the north-east side continues into the grid sidewall), the red brick and mortar remains are 3 bricks thick with a faint black residue on the surface. The structure may have had sides at one time but appears to have been damaged, evidenced by the partial remains of brick courses on the south side and the outlines of a 2' wide rough, uneven brick and mortar surface around the perimeter. The structure's alignment suggests possible association with the railroad machine shop.

G-44– Within an excavated area of 70' x 50', the remains of red brick and mortar foundations, piers, and concrete footings were exposed at 24" below surface grade. Foundation A, over 40 feet long, was 12 courses in height with a north-south alignment. With the top of the foundation covered almost completely with fill, each "side" was exposed revealing a three brick wide construction with rebar. Two brick piers, N and O, with concrete footings on each side are connected and located at the north end of the foundation. Two additional foundations, B and C, were partially exposed, their full dimensions unknown. Foundation B appears to run perpendicular to Foundation A, located in the south corner area of the grid. Foundation C was exposed in the west corner of the grid, and runs north-south; a substantial structure, 12 courses high with a 15" thick concrete footing on top, the width and length are unknown. Six isolated piers exposed, E-J, align with one another, running east-west. Shapes and sizes varied, some with square (12.5" x 12.5") or rectangular (13" x 17") tops and square (27" x 27") or rectangular (24" x 29") bases and anywhere from 5 to 12 courses in height. Two piers, K and L, had remains of wood associated with them. Piers L and M were in a very bad state of preservation, having only one row or a few bricks in situ. Both Pier D, with an attached concrete footing, and Pier P, were only partially exposed, their full dimensions unknown. The alignment and angle of the piers and foundations with one another suggests again a probable roundhouse association.

G-46– The largest grid excavated, 70' x 60', revealed a red brick and mortar foundation ~70 feet in length. At ~10" below surface, Foundation A is 6 courses in height, 26" wide at it's base, and 17" wide on top, observed as two

State of California The Resources Agency — Primary #
DEPARTMENT OF PARKS AND RECREATION — HRI #
PRIMARY RECORD — Trinomial
NRHP Status Code
Other Listings City of Los Angeles Historical Cultural Monument #82
Review Code — Reviewer — Date

 *Resource Name or #: Cornfield/River Station

bricks wide, laid end to end. Both ends continue into the grid sidewalls, with the foundation's overall length unknown. The remains of a badly deteriorated wood-encased pipe lay alongside the foundation on its north side. About 30 feet in length, a cutout or ledge was incorporated in the foundation to accommodate this feature. The metal pipe, ~8"/10" in diameter, was quite rusted with holes and several gaps. A 5' long section of wood measured ~1/4 inch in thickness but its width was unable to be determined. Feature 2 is a single course of both red and fire brick and mortar construction that extends south and perpendicular off of Foundation A. Located 10' west of the grid's east side perimeter and measuring ~6' 4" long x 17" wide, the bricks are loose and uneven, very dry, porous and easily crumble. The feature does not appear to tie in structurally with Foundation A, whose alignment may correlate with the railroad forge shop.

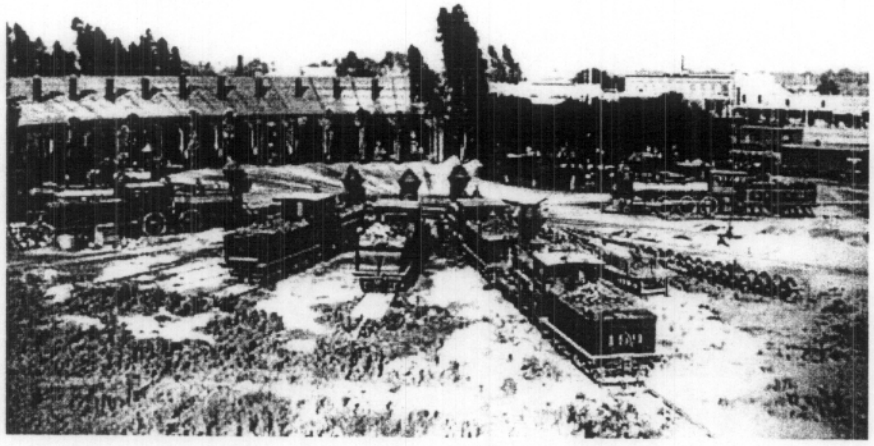
Grid-49– Measuring 10' x 10' and excavated to 5' below grade, the grid revealed the remains of one brick and mortar pier, 6 courses in height in the west sidewall. Seen only in profile, the isolated pier's top surface was ~21" below grade with a width of 19 inches. May be associated with the railroad forge shop.

Grid-77– A historic trash deposit was revealed in the grid's west profile ~29" below surface. A representative sample was obtained by excavation of a controlled unit, 1 meter square. Labeled Feature 1, two levels were recorded: L-1, 29" to 33" below grade and L-2, 33" to 45" below surface. Numerous artifacts were collected including ceramics, bottle glass, bone, shell, buttons, seeds, leather shoe heels, nails, and miscellaneous metal objects. Several late 19th century ceramic ink bottles were retrieved, substantiating a possible correlation with the railroad depot printing room that was located in the vicinity.

Grid-113– One set of railroad tracks and wood ties were exposed ~13" below surface during excavation. Located at the northeast end of the parcel, the tracks were ~15 feet in length, with a north-south alignment, a span of the North Broadway Street Bridge. The age of the tracks was undetermined, however the importance of the bridge and surrounding area in early Los Angeles history should not be underestimated. Designated California State Historical Landmark #655 (plaque located on the bridge), the Portolá Trail Campsite No. 1 here in the area is where the Don Gasper de Portolá expedition camped on August 2, 1769, after crossing Porciuncula– Los Angeles River, en route to Monterey during the Spanish colonization of California.

***P3b.** Resource Attributes: AH2–Brick and mortar foundations and piers; AH4–trash scatter/dump; AH7–railroad tracks and wooden ties.
***P4. Resources Present:** Building__Structure X Object X Site X District__Element of District__Other__ (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



P5b. Description of Photo: (View, date, accession #)

***P6. Date Constructed/Age and Sources:** 1875; 1888 Sanborn Insurance Map

☒Historic ☐Prehistoric ☐Both

***P7. Owner and Address:** California Department of State Parks and Recreation (DPR).

***P8. Recorded by:** Peter Messick

***P9.** Date Recorded: 3/4/03
***P10. Survey Type**: Monitoring during soil remediation and data recovery.

***P11. Report Citation:** (Cite survey report and other sources, or enter "none.")

Messick, Peter, Roberta S. Greenwood, and Alice Hale LA6335
2003 *Archaeological Monitor Report, Historic Cornfield Railroad Yard.* Greenwood and Associates. Submitted to The Trust for Public Land, San Francisco.

***Attachments:** __None X Location Map X Sketch Map __ Continuation Sheet __ Building, Structure, and Object Record
X Archaeological Record __District Record __Linear Feature Record __Milling Station Record __Rock Art Record
X Artifact Record __Photograph Record __Other (List):

State of California The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
Primary # 19-003120
Trinomial

ARCHAEOLOGICAL SITE RECORD

 *Resource Name or #: Cornfield/River Station

*A1. **Dimensions: a. Length:** ~2400 feet N-S **b. Width:** ~480 feet E-W
Method of Measurement: Paced Taped Visual estimate Other: Measured drawings.
Method of Determination (Check any that apply.): X Artifacts X Features _Soil _Vegetation _Topography
_Cut bank _ Animal burrow X Excavation X Property boundary _Other (Explain):

Reliability of Determination: _ High X Medium _ Low Explain: Only monitored predetermined soil remediation zones/grids. Deposits obviously extend beyond grids, not presently visible.
Limitations (Check any that apply): X Restricted access _Paved/built over X Site limits incompletely defined _Disturbances _Vegetation X Other (Explain): Site may extend to the northwest into the easement for the Los Angeles to Pasadena Metro Blue Line (LAPBL).
A2. **Depth:** Variable from 0 to 11 feet. _None _Unknown **Method of Determination:** Controlled excavation and monitoring.
*A3. **Human Remains:** _Present X Absent _ Possible _ Unknown (Explain):

*A4. **Features:** Grid 34: Feature 1, One trough-like, rectangular shaped feature of brick and mortar, measuring 16" wide x 3' long, built on top of Foundation A. A slight, black oily residue appears on the surface. Truncated or damaged by mechanical action. Feature 1,Grid 42: One brick and mortar base, rectangular with dimensions of ~8 feet wide x 11 feet long. Three bricks thick, the feature represents the bottom remains of a structure that had ~2' wide sides at one time. A faint black residue was visible that covered the inside surface. Grid 46: Feature 1, Poorly preserved remains of a wood box encasing a metal pipe, over 30 feet in length, beside Foundation A on the north side. Constructed of redwood planks, ~1/4 inch thick, the overall dimensions were unattainable, due to poor condition. Also badly deteriorated, the thin walled pipe measured ~8/10 inches in diameter. Feature 2– A single course of mortared bricks, both red and fire kiln. Extends south and perpendicular off of Foundation A, approximately 10 feet west of the grid's east side having dimensions of ~6' 4" long x 17" wide. The bricks are uneven, loose, very dry and porous with a unusual amount of white powdery lime residue on the surface. Grid 77: Feature 1, An historical artifactual trash deposit was revealed in the grid's west profile. A controlled unit,1 meter square, was excavated to obtain a representative sample starting at 29 inches below grade to a finishing depth of ~45 inches. Two levels were recorded, Level 1: 29" to 33" below surface; Level 2: 33" to 45" below surface. Numerous artifacts collected, both whole and fragmented, included ceramics, glass: bottle and window pane, mammal bone: saw cut and burned, shell, seeds, buttons, miscellaneous metal objects, and nails. The deposit's date, origin, and association with the late 19th century railroad depot and hotel are strongly supported by several artifacts recovered– in particular, two kinds of ceramic ink bottles (English and French) with maker's marks. Grid 113: Feature 1, One set of railroad tracks and wood ties, 15 feet in length, were exposed ~13" below surface. Located underneath the North Broadway Street Bridge, on a north-south alignment, the date of the tracks is unknown.

*A5. **Cultural Constituents:** Numerous artifacts recovered from Grids 34, 36, 42, 44, 46, 105, and 115 include ceramics, glass (bottle), mammal bone, brick, and miscellaneous metal objects including 1 horseshoe. Surface finds recovered within the parcel include ceramics, glass (bottle), shell, and tile. Makers' marks on several artifacts provide a range of dates from the late 19th century through postwar and contemporary times.

*A6. **Were Specimens Collected?** _No X Yes (If yes, attach Artifact Record or catalog and identify where specimens are curated.)
*A7. **Site Condition:** _Good X Fair _ Poor (Describe disturbances.): Site has undergone demolition, grading, trackage removal, and upper parts of structures removed. Site is located on a large (32 acre) open dirt exposed surface. Has been owned and occupied railroad property (last previous owner: Union Pacific Railroad Co.) for more than 125 years.
*A8. **Nearest Water:** Los Angeles River is adjacent to parcel in the northeast end, ~250 feet east.
*A9. **Elevation:** Between 298.50 and 307.88 ASL with a slight slope downward, east to west.
A10. **Environmental Setting:** Parcel lies within the Los Angeles River's flood plain with alluvial soils in the area consisting of silts and silty sands underlain with intermixing sand, gravel, and cobble layers; vegetation limited to sparse, weedy growth.

A11. **Historical Information:**
*A12. **Age:** _Prehistoric _Protohistoric _1542-1769 _1769-1848 X 1848-1880 X 1880-1914 X 1914-1945 X Post 1945 _Undetermined **Describe position in regional prehistoric chronology or factual historic dates if known:**

A13. Interpretations: Remains of the Southern Pacific Railyard complex, including the roundhouse and other structures.
A14. Remarks: Site is being turned into a State Park.
A15. References (Documents, informants, maps, and other references): Messick, Peter, Roberta S. Greenwood, and Alice Hale 2003 *Archaeological Monitor Report, Historic Cornfield Railroad Yard.* Greenwood and Associates. Submitted to The Trust for Public Land, San Francisco. Foster, John M., 2002. *Archaeological Inventory for Soil Remediation: Cornfield Rail Yard Project, City of Los Angeles, California.* Greenwood and Associates. Submitted to The Trust for Public Land, San Francisco.
A16. Photographs (List subjects, direction of view, and accession numbers or attach a Photograph Record.): Original Media/Negatives Kept at: Greenwood and Associates, 725 Jacon Way, Pacific Palisades, CA 90272
*A17. **Form Prepared by:** Pete Messick **Date:** 3/4/03
Affiliation and Address: Greenwood and Associates, 725 Jacon Way, Pacific Palisades, CA 90272

State of California The Resources Agency	Primary #
DEPARTMENT OF PARKS AND RECREATION	Trinomial
ARTIFACT RECORD, Part I	

Artifacts were encountered in the form of a few scatters and individual isolates, as well as the discrete deposit in Grid 77. Items included ceramic fragments, tile, bottle glass fragments, butchered mammal bone, construction or demolition debris, metal railroad tie plates and spikes, and amorphous discarded metal. Isolated artifacts with any diagnostic or intrinsic, historic value were recorded and collected. Scatters of modern debris observed but not collected included clothing, glass and plastic beverage bottles, aluminum cans, and toiletry items attributed to pedestrians or homeless persons.

Grid 42 - Recovered from fill above Feature 1 at ~18": ceramics-- 1 fragment of whiteware plate; glass- 1 fragment of bottle (mouth); metal-1 nail.

Grid 44 - Recovered from fill above foundation A at ~24": glass- fragments of brown bottle; metal-1 piece of rebar (round), 2 inch diameter, 21" long, with attached tie plate, 1 large metal bolt. Recovered from fill in the northeast quadrant, at ~30": 1 horseshoe.

Grid 46 - Recovered from fill material, surface to ~40": ceramics- fragments from plate (1 piece with embossed mark, bowl, and pitcher include porcelain, whiteware and earthenware; glass- 1 whole bottle embossed "J. W. HUNNEWELL & CO. Boston" (ca. 1850s-1880s), and other fragments,milk glass; bone- fragments from large and medium mammal including several jaws with teeth, some saw cut; metal rings/loops and other miscellaneous metal objects.

Grid 77 - Recovered from the unit: Level 1, ~29" to 33" below surface: ceramics- fragments include whiteware and earthenware; glass- numerous bottle fragments, clear and colored, and window pane; bone- numerous large mammal, some saw cut; shell- numerous fragments of shell (Pismo clam, *Tivela stultorum*); fragments of miscellaneous amorphous metal. Level 2, ~33" to 40" below surface: glass- fragments of marked bottles and window pane; bone- numerous fragments (bovine), some saw cut, some burned; shell- numerous fragments of Pismo clam, fragment of oyster, 1 whole scallop; metal- several sizes of nails, fragments of miscellaneous metal; seeds- several peach pits; 2 buttons. Level 2, ~40" to 45" below surface: ceramics- 2 fragments of porcelain pitcher, 1 fragment of yellowware, 1 fragment of stoneware; glass- numerous fragments of bottle glass, window pane; bone- fragments of livestock some burned; shell- fragments of Pismo clam; fragments of miscellaneous metal; 1 shell button.

Numerous artifacts were recovered from the soils removed to facilitate the excavation of the sampling unit, Feature 1. They include several whole glass bottles and two ceramic containers perhaps related to buildings of the depot-hotel:

1.) 1 whole stoneware ink bottle, clear glaze, English, with impressed mark "BOURNE & SON...DENBY DERBY," and traces of the paper label. This mark in use after 1850 (Godden 1964:90)
2.) 1 broken stoneware ink bottle, brown slip glaze, French, with impressed mark "P...ENCRE...M...JAPONAISE...NANTUNE & FILS." Maker not yet identified.

Grid 115 - The two artifacts were 1 fragment of a green wine bottle base, and half of a marked firebrick.
Surface Finds - A selection of artifacts collected from the surface is listed by proximity to the closest or nearby grid:

Grid 18 - Found 10' south of grid: 1 fragment of unglazed tile marked "BATCH..." [Batchelder].

Grid 25 - Found 2' east of grid: 1 whole oyster shell.

Grid 36 - Found beside perimeter: ceramics- 1 fragment each of porcelain(?), whiteware, stoneware, and redware; 1 fragment of porcelain insulator marked "PERU"; 1 fragment of a green wine bottle base. At ~12" depth: 1/3 of firebrick with partial embossed mark "PA...BR...PA" (another brick fragment with the same mark was recovered from G115; combining the two revealed, "PATENT...BROWN & SON...PAISLEY"). These may be the Paisley line of Acme bricks made in Texas 1924-1926 (Gurcke 1987:278-279). Recovered from fill material above foundation A at ~24": ceramics- fragments of porcelain (1 rim with gold band, 1 insulator); shell- large fragment of Pismo clam; metal- 1 small spike, 1 nail.

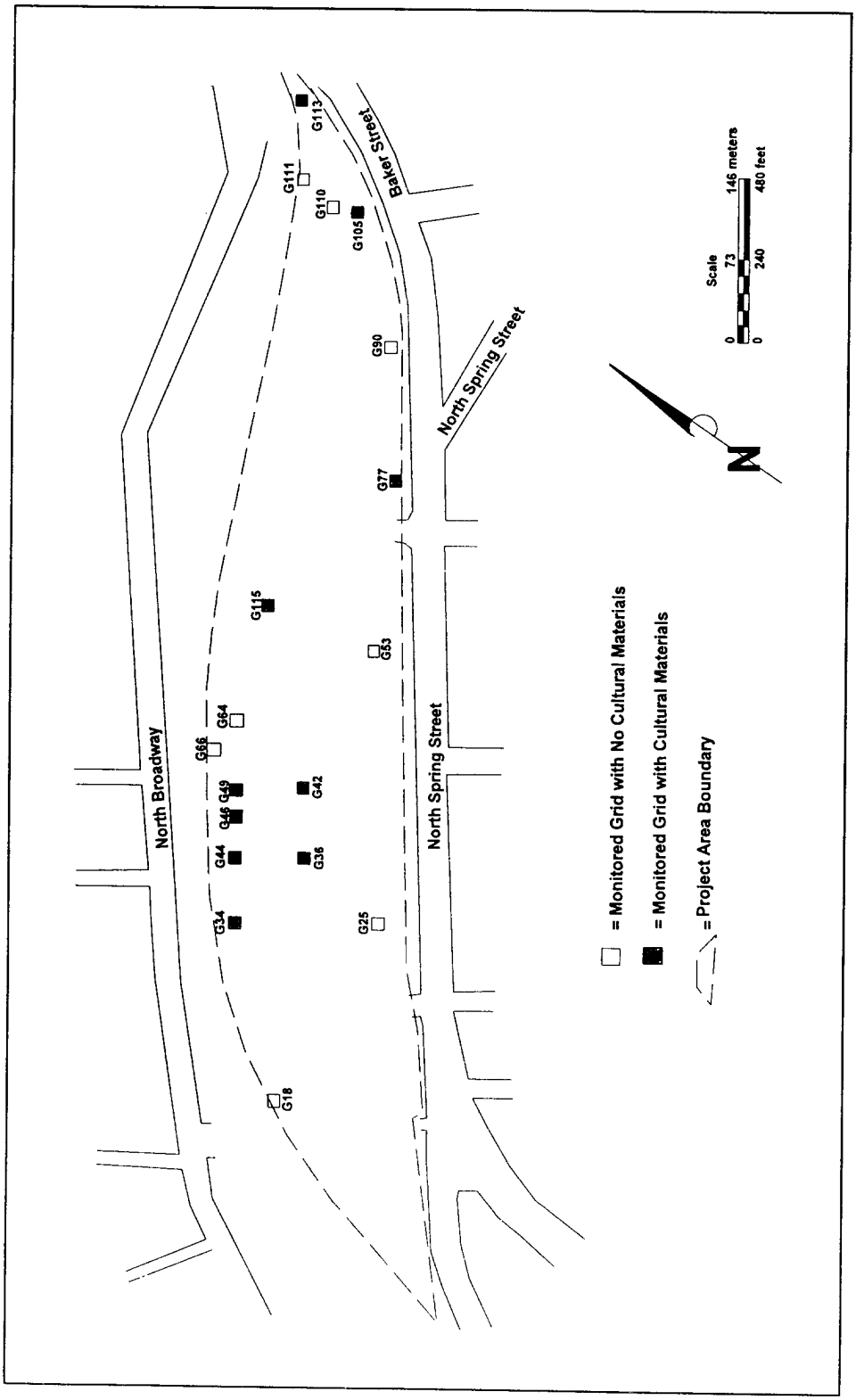
Grid 53 - Found along the perimeter: ceramics- 1 fragment of porcelain (polychrome), 1 fragment of whiteware (cobalt blue); 1 fragment of a green wine bottle base.

Grid 64 - Found ~3' along west sidewall: ceramics- 1 whole unglazed tile, earthenware, 3/8" thick and measuring 3" x 3" marked "BATCHELDER...LOS ANGELES...108"; 1 fragment of unglazed tile, earthenware, ½ " thick attributed to BATCHELDER; 1 piece of slag (?), obsidian-like material.

The artifacts recovered during monitoring and from the unit excavated in Grid 77 will be curated as directed by the California Department of Parks and Recreation under Accession No. P1303. These, together with materials recovered during the earlier testing, such as chamber pot fragments, flow blue ceramics, and embossed bottles such as the T. W. Dyott medicinal (Foster 2002:9) are evidence of the early use of the property in addition to items more obviously related to transportation.

State of California The Resources Agency Primary #
DEPARTMENT OF PARKS AND RECREATION **Trinomial**
Sketch Map

 ***Resource Name or #**: Cornfield/River Station

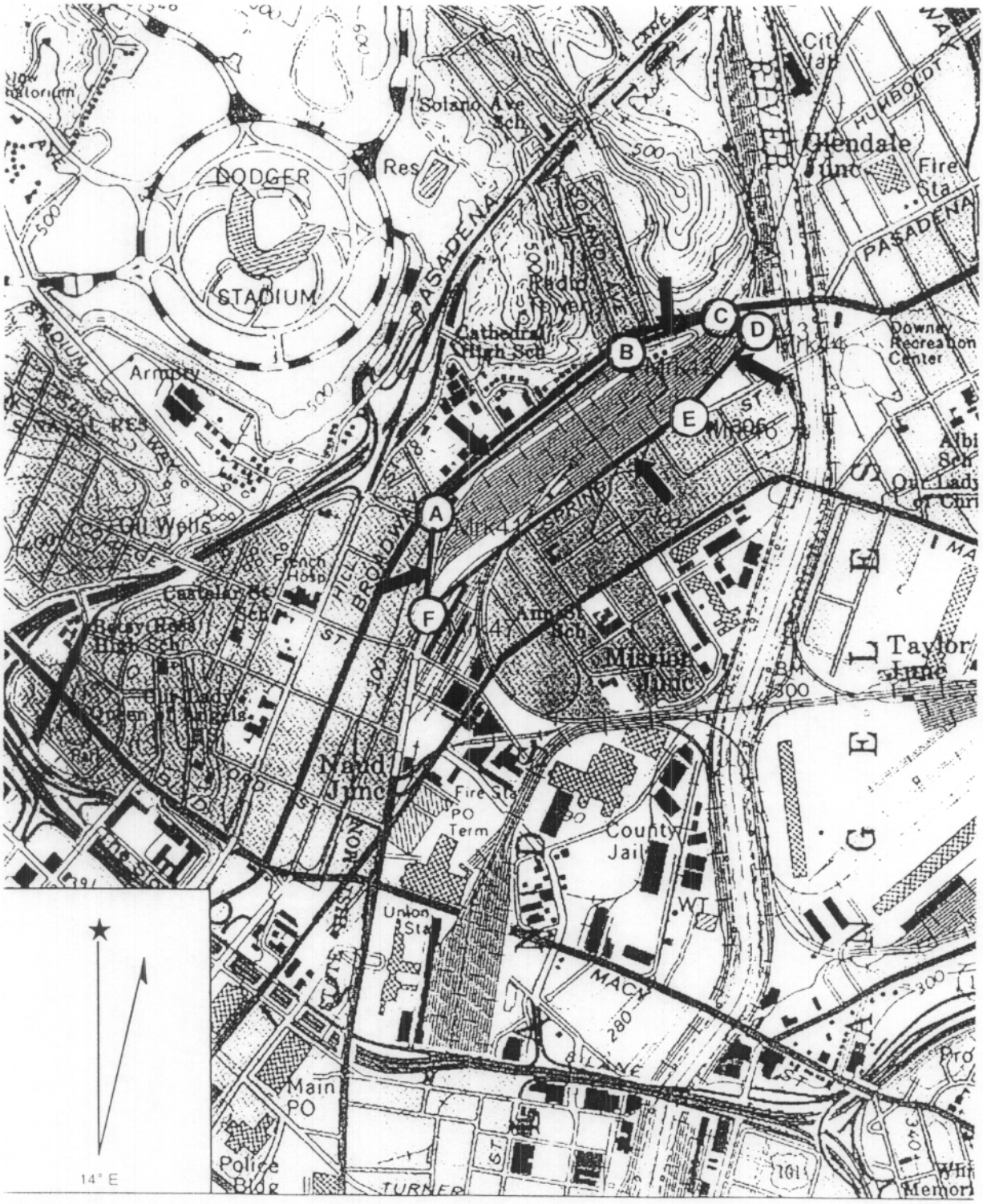


State of California The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
Site Location Map

Primary #
Trinomial

19-003120

 *Resource Name or #: Cornfield/River Station



Name: LOS ANGELES
Date: 3/17/2003
Scale: 1 inch equals 1333 feet

Location: 11 386491 E 3770230 N
Caption: Arrows Depict Site Boundary

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #: 19-003120
HRI # :
Trinomial: CA-LAN-3120
NRHP Status Code:
Other Listings:
☒ Update or Supplement | Review Code: | Reviewer: | Date:

*Resource Name or Number (Assigned by Recorder): River Station

P1. Other Identifier: Cornfield

*P2. Location: ☒ Not for Publication ☐ Unrestricted *a. County: Los Angeles

*b. USGS 7.5' Quad: Los Angeles Date: 1966 ;T 7S ;R 8W ; NA ¼ of NA ¼ of Sec. Unsectioned ; San Bernardino B.M.

c. Address: 1245 N. Spring Street City: Los Angeles Zip: 90012

d. UTM: (Give more than one for large and/or linear resources) Zone: 11 ; SW corner of the park: 386067 mE/ 3769797 mN;
NE corner of the park: 11386948 mE/ 3770541 mN;
☒ UTM Coordinates determined from USGS quadrangle map using UTM coordinate grid template

e. Other Locational Data (e.g., parcel #, directions to resource, elevation, etc., when appropriate): This archaeological site is located within Los Angeles State Historic Park in downtown Los Angeles. North Spring Street borders the site to the southeast, while Baker Street lies along the eastern edge of the park and site. The present park entrance is situated on North Spring Street. The MTA Gold Line tracks form the western and northwest border of the site today, with North Broadway Street just to the west and northwest of the tracks. The North Broadway Bridge that spans the Los Angeles River and adjoining warehouses is situated at the northeast edge of the site.

*P3a. Description (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries): The site consists of the buried structural remains of 19th century River Station, a railroad maintenance facility, freight and passenger depot, and rail yard operated by Southern Pacific. The maintenance shops, passenger depot, and hotel existed on-site from 1875 until 1904. In 1904, Southern Pacific moved the shops buildings to another location and this site was then employed by Southern Pacific as a freight yard for railroad traffic. All railroad activity ended here in 1996 when Southern Pacific ceased operation as a corporate entity. Los Angeles State Historic Park is 32 acres in size; its long axis runs northeast-southwest. The site of River Station underlies most of the park.

*P3b. Resource Attributes (List Attributes and Codes): HP17-Railroad Depot; AH2-Foundations/Structure Pad; AH4-Dumps/Trash Scatters; AH7-Roads/Trails/Railroad Grades; HP8-Industrial Building; HP11-Engineering Structure

*P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☒ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5b. Description of ☒ Photo ☐ Drawing (View, date, accession#): View of the park facing south, Los Angeles River in foreground and downtown LA in background, 2009



*P6. Date Constructed/Age and Sources ☐ Prehistoric ☒ Historic ☐ Both :

*P7. Owner and Address:
California Department of Parks and Recreation, P.O. Box 942896, Sacramento, CA 94296

*P8. Recorded by (Name, affiliation, address): Michael Sampson and Mary Garrett, State of California, Department of Parks and Recreation, Southern Service Center, 8885 Rio San Diego Drive, Suite 270, San Diego, CA 92108

*P9. Date ☐ Recorded ☒ Updated: October 5-6, 2010

*P10. Type of Study (Describe): Archaeological excavations, historical research, public interpretation.

*P11. Report Citation (Cite survey report and other sources, or enter "none."): Michael Sampson (2010)—The 2004 Archaeological Test Excavations at the Site of River Station, Los Angeles State Historic Park. Report on file, California State Parks, San Diego; Michael Sampson (2010)—The 2008 and 2009 Archaeological Investigations at the Site of River Station, Southern Pacific's Hub in Downtown Los Angeles, Los Angeles State Historic Park. Report on file, California State Parks, San Diego.

*Attachments: ☐ NONE ☒ Location Map ☒ Sketch Map ☒ Continuation Sheet ☐ Building, Structure, and Object Record
☐ Linear Feature Record ☒ Archaeological Record ☐ District Record ☐ Bedrock Grinding Record ☐ Rock Art Record ☐ Artifact Record
☐ Photograph Record ☐ Other (List):

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
ARCHAEOLOGICAL SITE RECORD
☒ Update or Supplement

Primary # : 19-003120
Trinomial : CA-LAN-3120

*Resource Name or Number (Assigned by recorder): River Station

*A1. Dimensions: a. Length 3740 ft (SW/NE) × b. Width 525 ft (NW/SE)
Method of Measurement: ☐ Paced ☐ Taped ☐ Visual estimate ☒ Other: Global Positioning System (GPS)
Method of Determination (Check any that apply.): ☐ Artifacts ☒ Features ☐ Soil ☐ Vegetation ☐ Topography ☐ Cut bank ☐ Animal burrow ☐ Excavation ☐ Property boundary ☐ Other (Explain):
Reliability of Determination: ☒ High ☐ Medium ☐ Low Explain:
Limitations (Check any that apply): ☐ Restricted access ☐ Paved/built over ☐ Disturbances ☐ Site limits incompletely defined ☐ Vegetation ☐ Other (Explain):

A2. Depth: 9 inches to 7 feet + below present surface ☐ None ☐ Unknown Method of Determination: Excavations

*A3. Human Remains: ☐ Present ☐ Absent ☐ Possible ☒ Unknown (Explain): No human remains observed.

*A4. Features (Number, briefly describe, indicate size, list associated cultural constituents, and show location of each feature on sketch map.): See Continuation Sheet

*A5. Cultural Constituents (Describe and quantify artifacts, ecofacts, cultural residues, etc., not associated with features.): See Continuation Sheet

*A6. Were Specimens Collected? ☐ No ☒ Yes (If yes, attach Artifact Record or catalog and identify where specimens are curated.) Catalogs on file at California Department of Parks and Recreation, Southern Service Center.

*A7. Site Condition: ☒ Good ☐ Fair ☐ Poor (Describe disturbances.): The 19th century shops buildings, freight warehouse, depot, and hotel of River Station were demolished by Southern Pacific between 1902 and 1904 and moved to new locations. However, the building foundations, associated utility lines, and artifacts of those building sites that have been investigated to date remain in situ and in good condition. Fill soils that vary in thickness were placed over the 19th century building remains in 2005 and 2006 by State Parks to protect the 19th century features.

*A8. Nearest Water (Type, distance, and direction.): Los Angeles River is adjacent.

*A9. Elevation: 298-307 feet

A10. Environmental Setting (Describe culturally relevant variables such as: vegetation, fauna, soils, geology, landform, slope, aspect, exposure, etc.): Today, Los Angeles State Historic Park is covered in modern landscaping, decomposed granite roads and parking areas, and foot paths. The park is situated at the base of a prominent hill and had been located in the old floodplain of the Los Angeles River, prior to urbanization and the placement of the river within a concrete channel. The present-day park and site is flat. The present ground surface of the park is composed of fill soils brought onto the park by truck in 2005 and 2006. Underlying the fill deposits, there is a thin layer of very compact, light gray colored, gravelly track bedding; this layer is a 20th century artificial deposit upon which railroad tracks were placed within the Southern Pacific rail yard. Below the track bedding, there is most often a thin, compact dark gray or brown sandy silt layer, and then under that stratum are alluvial sands. The 19th century building foundations tend to be constructed upon the latter river sand deposits. The thickness and composition of the above mentioned strata varies at each building site. There are no buildings currently on top of the site of River Station. Commercial buildings are next to the park.

A11. Historical Information: See Continuation Sheet

*A12. Age: ☐ Prehistoric ☐ Protohistoric ☐ 1542-1769 ☐ 1769-1848 ☒ 1848-1880 ☒ 1880-1914 ☒ 1914-1945 ☐ Post 1945 ☐ Undetermined (Describe position in regional prehistoric chronology or factual historical dates if known): River Station operated on-site from 1875 until 1904. The site was solely used as a railroad freight yard from 1904 to 1996. The park day-use facilities (parking lot, walking paths, picnic tables, lawns, etc.) were installed in summer 2006.

A13. Interpretations (Discuss data potential function[s], ethnic affiliation, and other interpretations): See Continuation Sheet

A14. Remarks: See Continuation Sheet

A15. References (Documents, informants, maps, and other references): See Continuation Sheet

A16. Photographs (List subjects, direction of view, and accession numbers or attach a Photograph Record.): See Continuation Sheet
Original Media/Negatives Kept at: California Department of Parks and Recreation, Southern Service Center

*A17. Form Prepared by: Michael Sampson and Mary Garrett Date: October 5-6, 2010
*Affiliation and Address: State of California, Department of Parks and Recreation, Southern Service Center, 8885 Rio San Diego Drive, Suite 270, San Diego, CA 92108

*A4. **Features (Number, briefly describe, indicate size, list associated cultural constituents, and show location of each feature on sketch map.):** The known features in CA-LAN-3120H consist of brick-and-mortar wall foundations, brick foundations for repair pits within the Roundhouse site, brick foundations within the Machine Shop site, square shaped brick support piers inside building sites, a substantial intact wood structural foundation for the River Station turntable, a solid two-foot thick, dressed granite pedestal that served as the turntable center, utility pipes, several eight-foot square concrete support piers of undetermined function, a horizontal pavement of dressed granite paver stones, concentrations of vitrified fire brick and clinkers (that appears to be materials removed from a steam engine fire box), and other cultural remains. The 2008 excavations at the turntable site showed that the 19th century turntable had measured 70 feet in diameter. There are 19th century building sites known to have been present at River Station from historical data that have not yet been investigated. These building sites remain protected under imported fill. State Parks Archaeologists have not actively sought potential evidence of earlier historic activities at CA-LAN-3120H, such as agricultural work associated with the Pueblo of Los Angeles or prehistoric archaeological sites. Archaeological evidence of cultural activities that predate River Station may be buried under alluvial sands upon which the 19th century buildings were constructed.

*A5. **Cultural Constituents (Describe and quantify artifacts, ecofacts, cultural residues, etc., not associated with features.):** Collections resulting from excavations CA-LAN-3120H are cataloged under the following State Parks Accession numbers: P1303 (2002-2003), P1389 (2004), P1620 (2008), P1621 (2008), P1662 (2005), P1706 (2009), P1723 (2010), and P1726 (2009). All the collections are currently stored at the Southern Service Center in San Diego, along with their catalogs. The artifact collections consist primarily of metal objects such as machine parts, nuts and bolts, nails, spikes, tools, railroad ties, pipes, residue from forges (clinkers, etc.), coal, and bricks. Lesser numbers of ceramic objects, glass bottles fragments, pieces of window glass, and bone have been recovered during the excavations. All of the State Parks excavations, as well as the archaeological monitoring performed by Greenwood & Associates in 2002-2003, have uncovered numerous large-sized building remains.

A11. **Historical Information:** Los Angeles State Historic Park was the site of vineyards planted in the early 1800s by prominent families in the Pueblo of Los Angeles. River Station, as the new center of Southern Pacific's railroad operations in Southern California, was established in 1875 when Southern Pacific opened a freight warehouse and depot to complement its new rail yard. In 1879, a hotel was built next to the passenger depot to expand services to its passengers. At this same period of the late 1870s, general shops buildings were constructed at River Station including, a turntable and roundhouse, machine shop, blacksmith shop, car shop, paint shop, ice house, coal dock and storage structure, and other essential railroad maintenance facilities. The Roundhouse was expanded some time between 1881 and 1894. River Station served as the key transportation and freighting center for Southern Pacific Railroad in Southern California during the late 19th century and early 20th century. The train maintenance buildings and their associated functions were removed from River Station between 1902 and 1904 and relocated to a new facility in downtown LA. Southern Pacific continued to use the land upon which CA-LAN-3120 is situated as an important freight operations facility after 1904. Southern Pacific's freight operations ended in Los Angeles State Historic Park (and CA-LAN-3120) in 1996, when it ceased as a corporate entity. California State Parks took possession of this 32-acre parcel in 2001. The park, the former site of Southern Pacific's River Station, was designated as a State Historic Park at the June 10, 2005 California State Parks and Recreation Commission meeting.

A13. **Interpretations (Discuss data potential function[s], ethnic affiliation, and other interpretations):** River Station was the transportation hub for Southern Pacific in Southern California from 1875 to 1904 and an important center for freight traffic during the 20th century. This facility played a significant role in the commercial and demographic growth of Los Angeles and the greater Los Angeles region; the railroad helped make Los Angeles a financial power in the state of California and the West. The population of Los Angeles increased significantly during time that River Station was in operation. River Station, too, became the important center for shipping the products of the newly emerging citrus industry of Southern California to other parts of the country. Geophysical surveys in 2002 and 2008 and archaeological excavations by California State Parks Archaeologists in 2004, 2008, 2009, and 2010 clearly demonstrate that structural remains from 19th century River Station are still in-place and remain in good condition within Los Angeles State Historic Park, as represented by site CA-LAN-3120H. The building structural remains observed thus far in the above archaeological work have largely been brick-and-mortar; the turntable site is represented by a substantial wood structure with metal tie rods and adjoining brick flooring. All of the structural features are well constructed and in good condition. An architectural conservator evaluated structural features that been exposed during excavations in the summer of 2008. This archaeological information indicates Southern Pacific replaced its original late-1870s turntable with a newer one, most likely to accommodate the expansion of the Roundhouse. Excavations at various building sites have yielded numerous artifacts, in particular, metal hardware, tool parts, pipe, bricks, and other material.

A13. **Interpretations (Discuss data potential function[s], ethnic affiliation, and other interpretations):** The site of River Station holds great potential to address research questions about railroad operations in the 19th century, industrial architecture, steam engine construction, technological innovations employed in railroad maintenance, and other issues. For example, River Station was operational at the time when Southern Pacific initiated its transition from the use of steam engines to the full use of oil-burning engines. Test excavations in 2004 at the site of the Depot and Hotel showed that this site holds domestic refuse deposits; these deposits can address social and demographic issues. After removal of the shops buildings in 1904, Southern Pacific used the site as a rail yard for its growing freight business. Site CA-LAN-3120H, the site of 19th century River Station, is eligible for inclusion on the National Register of Historic Places.

A14. **Remarks:** In 2005 and 2006, California State Parks placed 3 to 7 feet of fill soils on top of the 19th century building sites for their protection. The 19th century archaeological features can be readily differentiated from the overlying fill soils by a horizontal stratum of very compact, light gray colored, gravelly track bedding. This artificial compact gravelly layer was placed over the 19th century structural remains by Southern Pacific for use as base for the railroad tracks in their 20th century rail yard. The current park day-use facilities, such as, the lawns, decomposed granite roadways and footpaths, picnic tables, and landscape features, were installed within the park in summer 2006. Additional plantings have been installed in spring and summer 2010. The park is popular with local residents for fitness walking, picnicking, and other activities. The State Park office located at the far northeast end of the park was constructed in September 2008. A small area of the park is currently used by a private lease holder for public art demonstrations, although, all their operation is placed upon fill soils and may be outside the location of any 19th century building sites.

A15. **References (Documents, informants, maps, and other references):** John F. Romani, Gwendolyn Romani, and Dan Larson (2000)—Results of a Phase I Investigation: River Station, 1245 North Spring Street, City of Los Angeles. Compass Rose Archaeological Consultants, Van Nuys, CA; Larry Mullaly and Bruce Petty (2002)—*The Southern Pacific in Los Angeles, 1873-1996*. Golden West Books, San Marino, CA; Peter Messick, Roberta Greenwood, and Alice Hale (2003)—Archaeological Monitor Report, Historic Cornfield Railroad Yard. Greenwood and Associates, Pacific Palisades, CA; Daniel O. Larson (2004)—Geophysical Investigations at the Corn Fields/River Station Site, Los Angeles County, California; California State Parks (2005)—Los Angeles State Historic Park General Plan; Mark Becker (2008)—The Results from a GPR Investigation of the Historic Railroad Depot at Los Angeles State Historic Park. ASM Affiliates, Carlsbad, CA; Michael Sampson (2010)—The 2004 Archaeological test Excavations at the Site of River Station, Los Angeles State Historic Park. Report on file at California State Parks, San Diego; Michael Sampson (2010)—The 2008 and 2009 Archaeological Investigations at the Site of River Station, Southern Pacific's Hub in Downtown Los Angeles, Los Angeles State Historic Park.

A16. Photographs (List subjects, direction of view, and accession numbers or attach a Photograph Record.):



Close-up of foundation at the SW end of the turntable in 2008

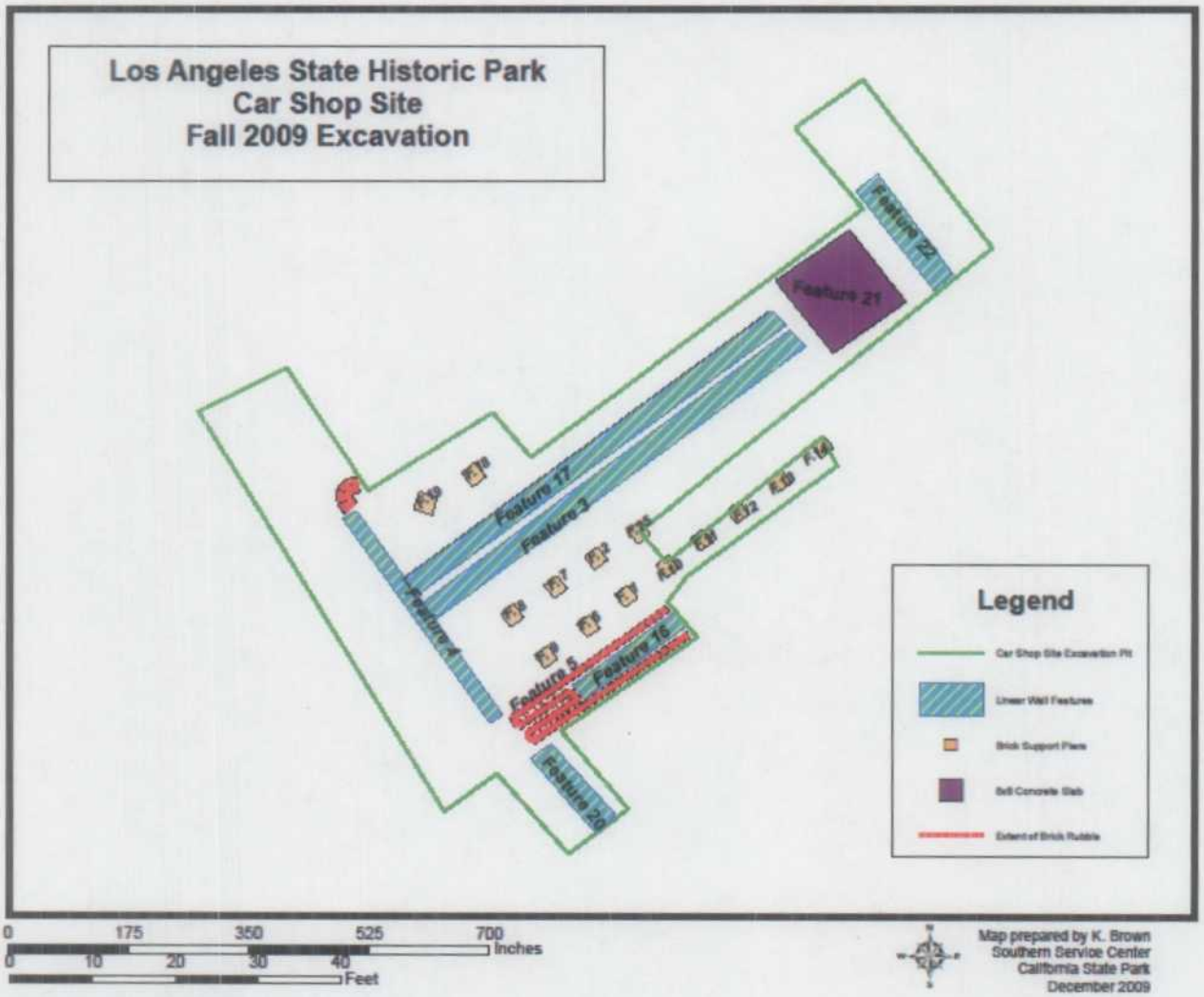


Overview of excavation of the car shop in 2009 (facing NE)



Overview of roundhouse repair pits 1 and 2 in 2010 (facing east)


Los Angeles State Historic Park
Detail of Archaeological Findings
2008-2009 Excavations
N. Broadway
N. Spring St
Legend
Turntable
Car Shop
Machine Shop
Round House
Transfer Table
8x8 Concrete Slab
Pavers
Park Boundary
Nearby Streets
0 200 400 600 800 Feet
0 0.04 0.08 0.12 0.16 Miles
Map Prepared by K. Brown
California Parks and Recreation
Southern Service Center
December 2009

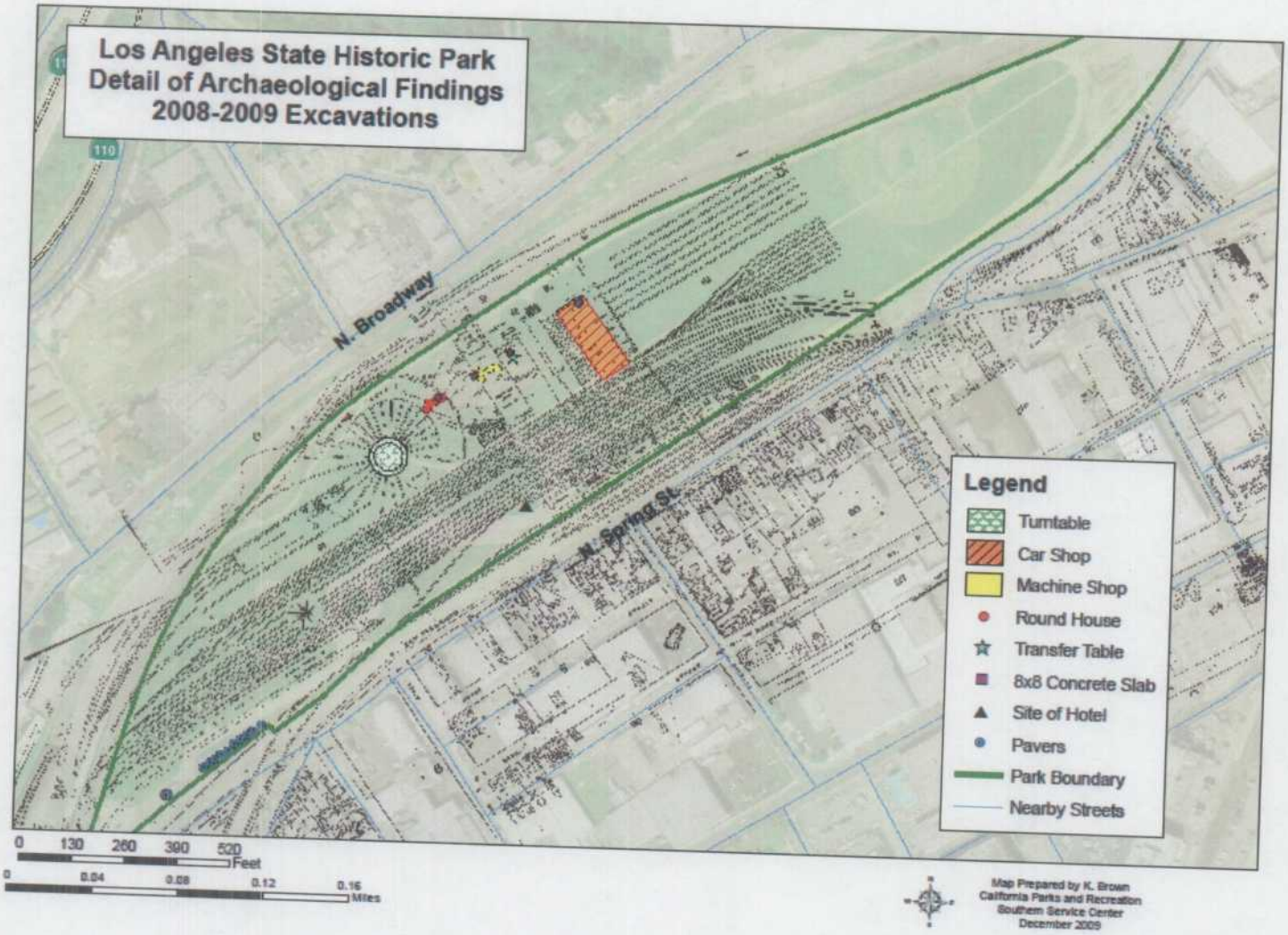

Los Angeles State Historic Park
Car Shop Site
Fall 2009 Excavation
Feature 22
Feature 21
Feature 17
Feature 3
Feature 4
Feature 5
Feature 16
Feature 20
Legend
Car Shop Site Excavation Pit
Linear Wall Features
Brick Support Piers
Still Concrete Slab
Extent of Brick Rubble
0 175 350 525 700 Inches
0 10 20 30 40 Feet
Map prepared by K. Brown
Southern Service Center
California State Park
December 2009

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

SKETCH MAP

Primary #: 19-003120
HRI#
Trinomial: CA-LAN-3120

***Resource Name or Number (Assigned by recorder):** River Station
***Map Name:** LASHP Detail of Archaeological Finding from 2008-2009 Excavations with Sanborn Map Overlay
***Scale:**
***Date of Map:** 12/2009



*Required information


Los Angeles State Historic Park
Detail of Archaeological Findings
N. Broadway
Linear Brick Wall Feature
Brick Debris Concentration
Fire Affected Brick
Brick Support Pier
Turntable Center
Brick Support Pier
Linear Brick Wall Feature
Legend
Turntable
Car Shop
Machine Shop
Round House
Transfer Table
8x8 Concrete Slab
Park Boundary
Nearby Streets
0 50 100 150 200 Feet
0 0.01 0.02 0.03 0.04 Miles
Map Prepared by K. Brown
California Parks and Recreation
Southern Service Center
December 2009

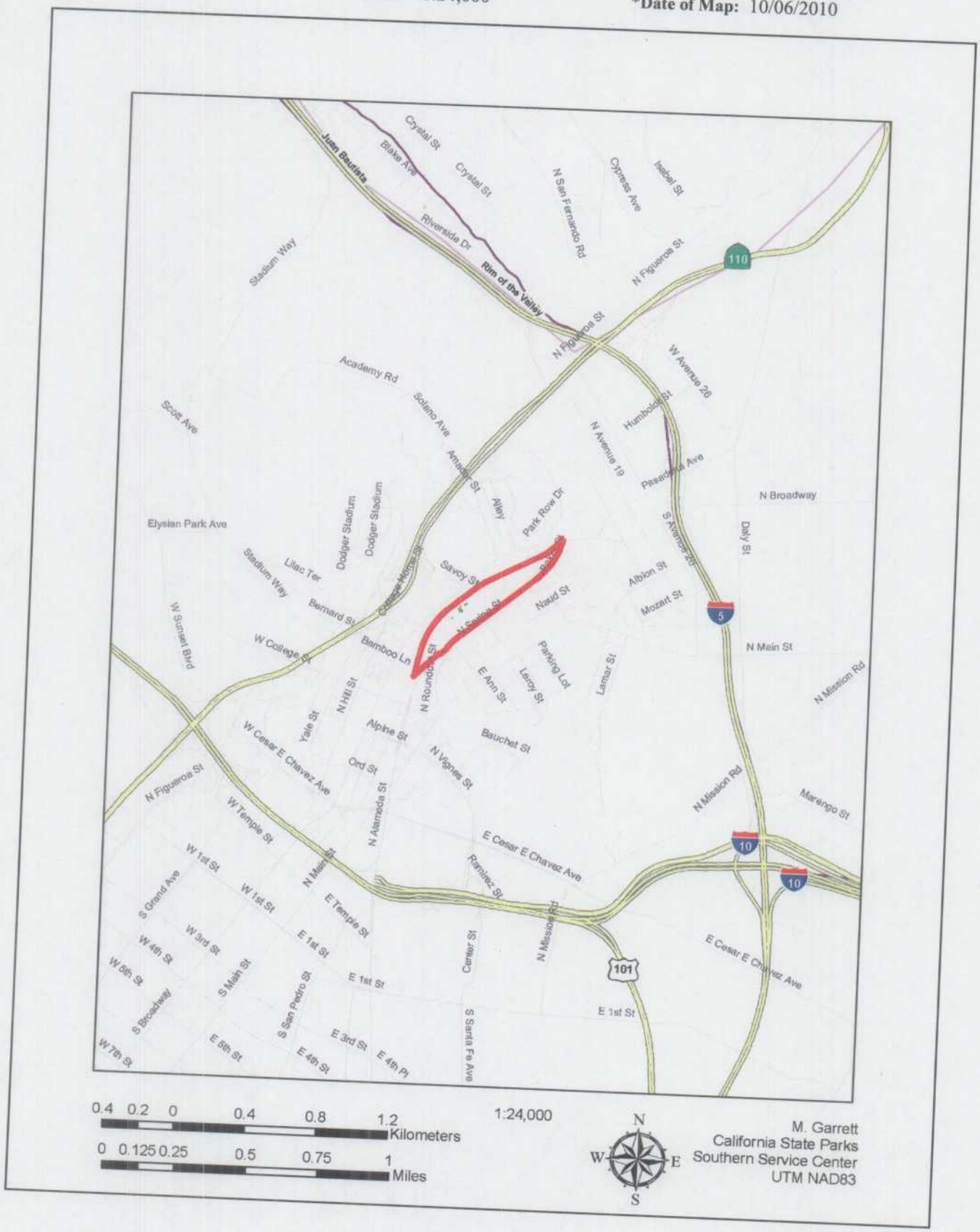
State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LOCATION MAP

Primary #: 19-003120
HRI#
Trinomial: CA-LAN-3121

Page 11 of 11
*Map Name:

*Resource Name or Number (Assigned by recorder): River Station
*Scale: 1:24,000
*Date of Map: 10/06/2010



DPR 523

*Required information

STATE OF CALIFORNIA – THE RESOURCES AGENCY
Arnold Schwarzenegger, *Governor*

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 653-6624 Fax: (916) 653-9824
calshpo@ohp.parks.ca.gov

June 4, 2009

Christeen Taniguchi
Galvin Preservation Associates, Inc.
1611 S. Pacific Coast highway, Suite 104
Redondo Beach, CA 90277

Re: Zanja Madre
National Register of Historic Places Nomination

Dear Ms. Taniguchi:

Thank you for submitting the Zanja Madre National Register nomination. The nomination provides a good overview of the history of the Zanja Madre, and discusses its beginnings in 1781 as an interconnected open ditch system, the introduction of enclosed pipes to the system, and its abandonment in 1904 as the City of Los Angeles' dominate water system. The overview introduces the context in which the system's significance can be evaluated under National Register Criterion A in the area of Engineering for important associations with the urban and agricultural development of Los Angeles. However, the nomination also indicates that the Zanja Madre water system no longer retains sufficient integrity to meet National Register eligibility, and that only a 75-foot segment of the Zanja Madre is being nominated.

Segments of linear resources can meet eligibility requirements for listing on the National Register if the nominated segment retains integrity, and is sufficiently long enough to convey the significance of the resource of which it represents. The nomination does not demonstrate how this segment of the Zanja Madre meets National Register eligibility requirements under Criterion A. While the segment is "directly associated" with the Zanja Madre, the nomination does not discuss how this small segment of the extensive water conveyance system conveys the Zanja Madre's significance for important associations with the development of Los Angeles (the historic context developed in the nomination for Criterion A eligibility).

It is possible for a segment of a larger resource to meet eligibility requirements if it can be documented to be a rare surviving element of the larger system. In this case, the nomination must establish the segment as the only or best surviving element of the system and demonstrate that the segment retains the essential physical features necessary to convey historic character of the resource. Although the nomination states, "this 75 foot long segment is by far the longest example left intact from this important period in the city's history" the nomination does not establish that as fact. A discussion of all of the components that made up the Zanja Madre system, including the

underground linear features, structures, and buildings associated with the system, and an analysis of the existing conditions of extant components would be necessary to understand the rarity of the segment. The nomination would still need to establish that enough of the property is surviving to convey significance.

If you determine the segment of the Zanja Madre might have the potential to meet National Register eligibility as a rare surviving example and will be redrafting the nomination, a few technical errors will need to be addressed. We would be happy to discuss the revision suggestions for the Zanja Madre nomination with you if you feel it would be of benefit. Please contact me at 916-653-5789, ctoffelmier@parks.ca.gov.

Sincerely,

Cynthia Toffelmier
State Historian II

CC: Wilbur Babb, Community Relations in Rail Operations, Los Angeles County Metropolitan Transportation Authority

NPS Form 10-900 OMB No. 10024-0018

United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determination for individual properties and districts. See instruction in *How to Complete the National Register of Historic Places Registration Form* (National Register Bulletin 16A). Complete each item by marking ``x'' in the appropriate box or by entering the information requested. If an item does not apply to the property being documented, enter ``N/A'' for ``not applicable.'' For functions, architectural classification, materials and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer, to complete all items.

1. Name of Property

historic name Zanja Madre

other names/site number N/A

2. Location

street & number about 100 feet south west of Broadway and Bishops Rd. intersection N/A ☐ not for publication

city or town Los Angeles N/A ☐ vicinity

state California code CA county Los Angeles code 019 zip code 90031

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that this ☐ nomination ☐ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60. In my opinion, the property ☐ meets ☐ does not meet the National Register criteria. I recommend that this property be considered significant ☐ nationally ☐ statewide ☐ locally. (☐ See continuation sheet for additional comments.)

Signature of certifying official/Title Date

State or Federal agency and bureau

In my opinion, the property ☐ meets ☐ does not meet the National Register criteria.
(☐ See continuation sheet for additional comments.)

Signature of certifying official/Title Date

State or Federal agency and bureau

4. National Park Service Certification

I hereby certify that the property is: Signature of the Keeper Date of Action

- ☐ entered in the National Register
  - ☐ See continuation sheet.
- ☐ determined eligible for the National Register
  - ☐ See continuation sheet.
- ☐ determined not eligible for the National Register.
- ☐ removed from the National Register
  - ☐ See continuation sheet.
- ☐ other, explain
  - ☐ See continuation sheet.

Zanja Madre
Name of Property

Los Angeles County, California
County/State

5. Classification

Ownership of Property
(Check as many boxes as apply)

[ ] private
[X] public-local
[ ] public-State
[ ] public-Federal

Category of Property
(Check only one box)

[ ] building(s)
[ ] district
[ ] site
[X] structure
[ ] object

Number of Resources within Property
(Do not count previously listed resources.)

Contributing	Noncontributing	
0	0	buildings
0	0	sites
1	0	structures
0	0	objects
1	0	Total

Name of related multiple property listing.
(Enter "N/A" if property is not part of a multiple property listing.)

N/A

Number of contributing resources previously listed in the National Register.

0

6. Function or Use

Historic Function
(Enter categories from instructions)

INDUSTRY/waterworks

Current Functions
(Enter categories from instructions)

INDUSTRY/waterworks

7. Description

Architectural Classification
(Enter categories from instructions)

Other : conduit

Materials
(Enter categories from instructions)

foundation
walls
roof
other BRICK AND MORTAR

Narrative Description
(Describe the historic and current condition of the property on one or more continuation sheets.)

Zanja Madre
Name of Property

Los Angeles County, California
County/State

8. Statement of Significance

Applicable National Register Criteria
(Mark ``x'' in one or more boxes for the criteria qualifying the property for National Register listing.)

[X] A Property is associated with events that have made a significant contribution to the broad patterns of our history.

[ ] B Property is associated with the lives of persons significant in our past.

[ ] C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.

[ ] D Property has yielded, or is likely to yield, information important in prehistory or history.

Criteria Considerations
(Mark ``x'' in all the boxes that apply.)

Property is:

[ ] A owned by a religious institution or used for religious purposes.

[ ] B removed from its original location.

[ ] C a birthplace or grave.

[ ] D a cemetery.

[ ] E a reconstructed building, object, or structure.

[ ] F a commemorative property.

[ ] G less than 50 years of age or achieved significance within the past 50 years.

Narrative Statement of Significance
(Explain the significance of the property on one or more continuation sheets.)

Areas of Significance
(Enter categories from instructions)

ARCHAEOLOGY: HISTORIC – NON-ABORIGINAL
ENGINEERING

Periods of Significance
1781-1904

Significant Dates
1781 (the Zanja Madre was created)
circa 1884-88 (the Zanja Madre was enclosed)

Significant Person(s)
(Complete if Criterion B is marked above).
N/A

Cultural Affiliation
N/A

Architect/Builder
unknown

9. Major Bibliographical References

Bibliography
(Cite the books, articles and other sources used in preparing this form on one or more continuation sheets.)

Previous documentation on file (NPS):

☐ preliminary determination of individual listing (36 CFR 67) has been requested
☐ previously listed in the National Register
☐ previously determined eligible by the National Register
☐ designated a National Historic Landmark
☐ recorded by Historic American Buildings Survey

#_____

☐ recorded by Historic American Engineering Record

#_____

Primary location of additional data:

☐ State Historic Preservation Office
☐ Other State Agency
☐ Federal Agency
☐ Local Government
☐ University
☒ Other

Name of repositories:
Los Angeles Central Public Library; Los Angeles Department of Water and Power (LADWP); Le Val Lund (former LADWP employee); Alicia Brown (of the Solana Canyon Neighborhood Association); Ed P. Reyes, Councilmember, 1st District.

Zanja Madre
Name of Property

Los Angeles County, California
County/State

10. Geographical Data

Acreage of Property N/A

UTM References
(Place additional UTM references on a continuation sheet.)

1.
Zone Easting Northing

2.
Zone Easting Northing

3.
Zone Easting Northing

4.
Zone Easting Northing =

Verbal Boundary Description
(Describe the boundaries of the property on a continuation sheet.)

Boundary Justification
(Explain why the boundaries were selected on a continuation sheet.)

11. Form Prepared By

name/title Christeen Taniguchi

organization Galvin Preservation Associates Inc. date July 30, 2008

street & number 1611 S. Pacific Coast Highway Suite 104 telephone 310-792-2690

city or town Redondo Beach state CA zip code 90277

Additional Documentation

Submit the following items with the completed form:

Continuation Sheets

Maps
A **USGS map** (7.5 or 15 minute series) indicating the property's location.
A **Sketch map** for historic districts and properties having large acreage or numerous resources.

Photographs
Representative **black and white photographs** of the property.

Additional Items
(Check with the SHPO or FPO for any additional items)

Property Owner

(Complete this item at the request of SHPO or FPO.)

name Los Angeles County Metropolitan Transportation Authority

street & number One Gateway Plaza telephone (213) 922-2700

city or town Los Angeles state CA zip code 90012

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C. 470 *et seq.*

Estimated Burden Statement: Public reporting burden for this form is estimated to average 18.1 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, P.O. Box 37127, Washington, DC 20013-7127; and the Office of Management and Budget, Paperwork Reductions Projects (1024-0018), Washington, DC 20503.

7. Description

Narrative Description

The nominated structure is a segment of the Zanja Madre, or "Mother Ditch", which was an early water conveyance system (conduit brick pipe) that was constructed some time between 1884 and 1888 to serve the irrigation needs of the City of Los Angeles. The resource is 75 feet long and three feet around and runs northeast to southwest. It was built along the path where an original open ditch was established in 1781 from the Los Angeles River to the Pueblos of Los Angeles.

This section of the Zanja Madre is made of red fired bricks laid in mortar. The segment has a slight bend in plan; the southwest segment is slightly longer than the northeast section. Each end has a rough oblique cut. The structure consists of two layers of brick cylindrical exterior interlaid with roughly applied mortar, with a cross section that is about three feet in diameter. The interior surface of the segment is smoother than the exterior because there was a form on the inside on which the bricks were originally laid. There are seams located about every nine feet, indicating the length of the form. About half of the bottom section of the structure is currently buried for drainage purposes, and the ends have been filled in with dirt.

The structure is currently located on Los Angeles County Metropolitan Transportation (MTA) property just northeast of Chinatown, and was unearthed in 2005 during the grading process for an access road and fiber optic cable. The conduit segment is flanked on the northwest, southwest and northeast sides by a bare poured concrete retaining wall. The wall protects the structure from potential landslides from the adjacent bluff. In April 2006, the immediate area surrounding the structure was landscaped with gravel and several accent rocks.

The closest cross-street to the Zanja Madre is Broadway and Bishops Road, which is located just northwest of the structure at the top of a privately owned bluff bordered with chain link fencing. An asphalt paved MTA access road is located directly to the southeast of the conduit segment. A concrete curb separates the Zanja Madre's landscaped area from the access road. The MTA Gold Rail Line is located about 165 feet to the southeast just beyond the access road behind a chain link fence. The newly established Los Angeles State Historic Park is located on the other side of the rails and fencing of the MTA property and overlooks the Zanja Madre. This 32 acre site has been more commonly known as the "Cornfield." The Chinatown Metro Gold Line station is located about 3,300 feet to the southwest of the nominated structure.

Integrity Statement

The Zanja Madre was evaluated against the seven aspects of integrity as outlined in National Register Bulletin 15. The seven aspects of integrity are location, setting, feeling, association, design, materials and workmanship.

This segment of the Zanja Madre retains its original location. It has not been moved.

The Zanja Madre system was established in 1781 at the same time that the pueblo of Los Angeles was founded. The nominated section of the conduit is located along the same original route. At the time, the Zanja Madre was an open dirt ditch with semi-tropical foliage lining its banks. It served a young pueblo which was still rural and agrarian in nature, with the commercial area of the pueblo located further southwest where Olvera Street is located today. Under Spanish and Mexican rule, this setting remained essentially the same. However, after Los Angeles became part of the United States in the mid-nineteenth century, the nature of the community began to change, particularly as a result of a significant population growth. In addition, the railroads began to be built across the nation, and Los Angeles was no exception. In the 1870s, the Southern Pacific Railroad established their Los Angeles hub directly southeast of the nominated segment of the Zanja Madre. This included their shops and yards, depot and hotel, as well as multiple rail lines that converged at this location. The original quiet and

rural qualities from the pueblo days were no more, and instead replaced by a bustling industrial feel. The Southern Pacific Railroad complex has since been removed. Today this same land is part of the Los Angeles State Historic Park more popularly known as the "Cornfield." The Zanja Madre segment is located to the northwest on a linear parcel owned by the Los Angeles County Metropolitan Transit Authority (MTA) on which the Gold Line tracks run. Although the park gives a sense of openness and nature, the setting has certainly changed, for the Zanja Madre segment is today a part of the MTA property which has active rail lines. In addition, the immediate surroundings of the segment have recently been landscaped with gravel and ornamental rocks, and a concrete retaining wall constructed behind it. All of these changes to the surroundings, coupled with the most significant fact that the conduit would have originally been hidden underground, have modified the setting, feel and association of this segment of the Zanja Madre since the period of significance.

The design, material and workmanship of this structure, however, are intact from the period of significance. At the time it was originally constructed, the Zanja Madre was an open ditch. Maintenance, damage and illegal use were constant problems. After some severe floods in 1884, the decision was made to enclose this system. The Zanja Madre was constructed with brick and concrete, making it into an underground conduit. The Zanja Madre then continued to serve the irrigation and industrial needs of the community until 1904, when it was abandoned. By this time, much of Los Angeles was now subdivided for development that the Zanja Madre (and the zanja branches that were constructed) no longer served a useful function. Since that time, this segment of the conduit system has lay dormant and undisturbed underground. It has also fortunately avoided being destroyed or damaged. Although each of its ends have been sheered off due to historic construction activities associated with the Southern Pacific Railroad, the nominated structure remains intact and maintains its design, materials and workmanship integrity.

Therefore, the overall integrity of this structure is good.

Condition Statement

The nominated Zanja Madre segment was unearthed in 2005, after being located underground for about 120 years since its original construction. Until then, the brick and concrete surfaces had been protected from weathering, damage, graffiti and other negative effects from the environment. Therefore, the exposed surfaces of this conduit are in good condition. However, each of the ends has a rough oblique cut, the result of damage from previous historic construction. The concrete retaining wall and gravel are meant to protect the conduit from future damage. The overall condition of this structure is good.

8. Statement of Significance

Narrative Statement of Significance

Summary

This segment of the Zanja Madre (Spanish for "Mother Ditch") meets Criterion A of the National Register of Historic Places at the local level of significance because of its direct association with the City's original water conveyance system that dates back to the days of the Spanish pueblo. This 75 foot long segment is by far the longest example left intact from this important period in the city's history and is an excellent and significant reminder of the critical role that water has played in the tremendous growth and prosperity of the City of Los Angeles. Its period of significance is from 1781 to 1904, the time period from when the Zanja Madre line was established until it was abandoned from use.

The Zanja Madre and its Beginnings

The Zanja Madre was the original water system for the City of Los Angeles, constructed when the community was first established as a small Spanish pueblo in 1781. Proximity to the Los Angeles River was the reason this area was chosen for the new settlement, and the Zanja Madre was a means to convey the water to the pueblo which would later become the City of Los Angeles. The nominated segment was part of this original Zanja Madre system.

The Los Angeles River was first discovered by a group of explorers led by Gaspar de Portolà on August 2, 1769. They were traveling north from San Diego towards the Monterey Bay and named their discovery Rio Porciúncula (later renamed the Los Angeles River).[1] On September 4, 1781, Felipe de Neve, an early Spanish Governor, arrived under order of King Carlos II to establish El Pueblo de Nuestra Señora la Reina de Los Ángeles sobre El Rio Porciúncula (translates to The Town of our Lady Queen of the Angels on the Porciúncula River). The name was later shortened to Los Angeles.[2] Eleven families first arrived from Sinaloa and Sonora (both states in what is today Mexico), and were promised free land, livestock, supplies and money. These early settlers would then be expected to provide food from their crops and livestock for the presidios.[3]

Access to water was of such high value that the original conduit system to the Los Angeles River was completed by the end of October, 1781, only seven weeks after the pueblo was founded.[4] The River flowed through boulders, gravel and sand that naturally purified the flowing water, as well as the ground water.[5] A dam called a "toma" was created made of willow branches, brush and mud on the west side of the Los Angeles River, just north of the current location of the North Broadway Bridge. The toma diverted the water into the ditch known as the Zanja Madre, which was about three feet wide and one foot deep, with water that ran about five miles per hour.[6] The original Zanja Madre system was an open earthen channel made of wood, clay and stone. It was irregular in size and grade flow along a porous and sandy ground.[7] The Zanja Madre continued along a bluff below what would later become Buena Vista Street (and today N. Broadway); the nominated section of the Zanja Madre is located along this section. The semi-tropical foliage that lined the banks of the Zanja complemented the

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[1] Spriggs, Elizabeth Mathieu, "Water for a Thirsty City," *The Grizzly Bear*, September 1931, 14.
[2] Spriggs, "Water for a Thirsty City," op. cit., 14.
[3] Julia G. Costello and Larry R. Wilcoxon, "An Archaeological Assessment of Cultural Resources in Urban Los Angeles, California: La Placita de Dolores – LAn-887," [1978], 17.
[4] Abraham Hoffman and Teena Stern, "The Zanjas and the Pioneer Water Systems for Los Angeles," *Southern California Quarterly* 89 (Spring 2007), 2.
[5] Spriggs, "Water for a Thirsty City," op. cit., 14.
[6] Melinda C. Horne, Applied EarthWorks, Inc., "Los Angeles to Pasadena Metro Blue Line Project: Phase-2 Cultural Resources Investigations of the Zanja Madre, Located in the Cornfield Yard of Los Angeles," February 2003, 4.
[7] Hall, William Hammond, *Irrigation in California (Southern)*: *The Field, Water-Supply, and Works, Organization and Operation in San Diego, San Bernardino, and Los Angeles Counties*, Sacramento, California: J. D. Young, super. State printing, c1888, 566.

rural and agrarian nature of this young pueblo.

Water rights were an important issue from the beginning. In 1810, the Franciscan fathers of the San Fernando Mission, located upstream in the San Fernando Valley, dammed the river near the Cahuenga Rancho. This reduced the water supply to the Los Angeles pueblo. The pueblo demanded the dam be removed. In response, the padres did willingly remove the dam, recognizing that the pueblo had a greater claim to the river water. In return, the Mission was allowed to continue using the water, but had to ensure that their use did not interfere with the constant flow of water to the pueblo.[8] Los Angeles was relocated in 1815 as a result of flooding problems, but its proximity to water was so important that its new location was still near the River.[9]

The water from the Zanja Madre was originally used for both irrigation and domestic purposes, and access was informal. The water would pass near the old Plaza at the center of town to provide domestic water. From there it was manually carried into homes and businesses. People could either come up to it and get the water themselves, or pay someone to deliver it. The local Indian men would transport the water via a yoke strapped across their shoulders, while women, known as "Rebeccas," would carry them on containers on top of their heads.[10] The delivered water was then stored at home in "ollas," which were large clay or terra cotta urn-shaped pots that were hung from trees. The ollas were generally about five or six gallons in size. A dipper with a long handle, generally made from a gourd was kept nearby to accept the water. The trees would help shade the water and keep it cool.[11]

By the 1850s, some carriers were using a wheelbarrow with a barrel between the handles to deliver water to the homes. Others used ox or horse drawn carts which carried a water barrel. "Bill the Waterman" used a cart drawn by two horses to deliver water and charged by the gallon.[12] Bill's water, however, was not always pure; he got it directly from the Los Angeles River which often made the water murky because the oxen and horses were constantly crossing it. Bill was followed by Dan Schieck who delivered cleaner water that came from the Zanja Madre itself.[13] Also by the 1850s, a water wheel was constructed near the Los Angeles River, in order to bring the water up into the Zanja Madre. However, floods during the same decade would wash the water wheel, as well as the toma, away. Several new dams were constructed, before a new one made of wood piles was built further north.[14]

The water from the Zanja Madre also provided irrigation for the farms located within the pueblo. The principal crops at that time were vines, citrus fruits, deciduous fruits, alfalfa, corn, wheat and barley.[15] Lateral ditches were made from the main ditch, to bring water to irrigate farm land.[16]

Because it was an open system, however, there were inevitable problems associated with it. Natural debris such as branches and dirt would get into the Zanja Madre. Heavy rains could also damage the ditch.[17] Fish from the river would also get into the system. The bigger problem, however, was human contamination. People would put food into a bucket and lower it down into the Zanja Madre water to keep cool. Worse things occurred, however, such as people washing their clothes and bathing in the water. Even human and other animal carcasses were

[8] Hoffman and Stern, op. cit., 8.
[9] Hoffman and Stern, op. cit., 2.
[10] Hoffman and Stern, op. cit., 2.
[11] Hoffman and Stern, op. cit., 4.
[12] Spriggs, "Water for a Thirsty City," op. cit., 14.
[13] J. Gregg Layne, "Water and Power for a Great City: A History of the Department of Water & Power of the City of Los Angeles to December, 1950," Los Angeles, California, 1952, 34.
[14] Gust, Sherri, "The Archaeology and History of the Zanja Madre Below Broadway, City of Los Angeles, California," April 2007, 27.
[15] Hall, op. cit., 557.
[16] *An Illustrated History: Los Angeles County, California: Containing a History of Los Angeles County from the Earliest Period of its Occupancy to the Present Time, Together with Glimpses of its Prospective Future; with Profuse Illustrations of its Beautiful Scenery, Full-Page Portraits of Some of its Most Eminent Men, and Biographical Mention of Many of its Pioneers and also of Prominent Citizens of To-day*, Chicago, Illinois, The Lewis Publishing Company, 1889, 262.
[17] Hoffman and Stern, op. cit., 4.

thrown away into the water.[18]

In 1850, the same year that California became the 31st state of the union, Los Angeles was incorporated as a city. Soon various measures were taken to prevent the Zanja water from being contaminated, such as an ordinance of 1850 and an ordinance from 1852 that prevented bathing in the Zanja. These measures, however, did little good. Part of the problem was that the ordinances were not strictly enforced and fines were not collected. Even another ordinance in 1873 did little to curb the misuse of the Zanja Madre.[19] There were, however, other successful ordinances passed during the 1850s regarding water rights. These laws made sure that the city of Los Angeles continued to maintain exclusive ownership of the river water, and the rights to use it for irrigation.[20]

Changes to the Water System

With the City's population ever increasing, the problems associated with maintaining the Zanja Madre got worse. A large part of the solution was the "zanjero" (water overseer), a position created in 1854 upon the recommendation of then mayor, Stephen C. Foster. The zanjero's duties included inspecting the Zanja Madre, keeping its water clean, and enforcing the ordinances. The local landowners provided either monetary compensation or Indian labor to pay for the maintenance of the zanjas and the tomas. The Indian laborers helped the zanjero maintain the water system.[21] As his duties increased, the position of deputy zanjero was created in 1879 by the Los Angeles City Council.

The zanjero's office was also responsible for overseeing the irrigation needs of the City's farms. Near the end of each month, the farmer would make a written request to the zanjero's office of his water needs for the coming month. As part of his application, the farmer would state the number of acres he owns, the zanja that he irrigates from, the number of days, half days, nights or hours he would like to use the water, and the dates he would like to make use of it. The zanjero would determine how much water was needed and create a schedule. The farmer would then apply for a permit according to the schedule. The permit was signed by the zanjero and the mayor. The water was then released by a deputy zanjero onto the farmer's property from the zanja after payment was received. Although the farmer was responsible for constructing the gates or outlets for the water, they were not allowed to open or close them; only the zanjeros had that right.[22] Water theft, however, was still a problem, particularly when it came to irrigation water. Diversion ditches, for example, would be dug in the middle of the night, then filled back in by day light. Patrols were later formed in order to guard the water at night.[23] By 1860-61, the zanjero's salary was more than that of the mayor.[24] The zanjero and his deputies even had the power to make arrests. The position the zanjero held was a reflection of the significance of water for the survival and prosperity of the City.

With the continued growth of the city, the original Zanja Madre expanded for the first time with nine new zanja branches, beginning in 1857. These new zanjas were also open ditches of irregular size and grade.[25] Of these, seven zanjas branched from the Zanja Madre. Zanjas 3, 4, 5 and 8 branched out from the original 1st Street terminus of the Zanja Madre. Zanja 6-1 was constructed from the Zanja Madre near the Los Angeles river end, and then in turn branched out into Zanjas 1 and 2. These new zanjas extended beyond the original pueblo center to serve the farmlands located to the south. There were also two ditches on the east side of the river, Zanjas 7 and 9-E. The Zanja Madre continued to serve the needs of the city itself, while the nine branches irrigated nearly 1,200 acres of vineyards, orchards, gardens and fields.[26] Until 1877, however, access to water was limited to the

[18] Elizabeth Mathieu Spriggs, "The History of the Domestic Water Supply of Los Angeles," 1 January 1931, Thesis for Master of Arts, 18.
[19] Hoffman and Stern, op. cit., 7.
[20] Hall, op. cit., 559.
[21] Hoffman and Stern, op. cit., 4.
[22] Hall, op. cit., 552-53.
[23] Hoffman and Stern, op. cit., 5.
[24] Hoffman and Stern, op. cit., 4.
[25] Hall, op. cit., 566.
[26] Hoffman and Stern, op. cit., 14.

low bottoms that bordered the river that could be easily accessed by ditches. The water then served the areas within the city limits, but could only reach a few farms outside the southern boundaries.[27]

In 1855, the Zanja Madre was diverted into a flour mill located at 1231 N. Spring Street, which was owned by Abel Stearns at the time. This is the only known diversion of the Zanja Madre for industrial use. A water wheel was used to bring the water into the mill; the Zanja then continued its route towards the Plaza. By the 1880s, the property became the Capitol Mills Company, and operated as such until the late 1990s.[28] The building still stands today, located to the west of the nominated segment of the Zanja Madre.

By the middle of the nineteenth century, the zanjas could no longer sustain the domestic water needs of the city. After California became United States territory in 1848, and especially after it became a state in the union two years later, the population of Los Angeles increased tremendously. There were almost 4,000 people in Los Angeles by the time it was incorporated in 1850 and became the largest town in Southern California.[29] This meant an increased demand for domestic water. A new system to bring water into homes via pipes gradually replaced the water being delivered by hand or cart directly from the Zanja Madre. The first attempt was made by William G. Dryden in 1857. The water he provided came from Dryden Springs on his own land, rather than the Los Angeles River. However, he did make use of the Zanja Madre by creating a water wheel and pump on the property he had acquired from Juan Sepúlveda on the Placita Block just east of the Plaza. The water was brought into the reservoir he had constructed in 1860 at the center of the Plaza. It is likely that Dryden purchased this land because the Zanja Madre passed through it, and also because of the land's location at the center of town.[30] However, frequent flooding of the Los Angeles River sabotaged the system so that the more traditional means of manually delivering the water still continued. Jean L. Sainsevain then signed a contract with the city in 1862 to install new wood domestic water pipes and also create a dam and flume.[31] He later worked with former mayor Damien Marchessault in his venture. These pipes frequently burst and were not successful, so they were replaced with iron ones instead.[32]

Success with domestic water finally came in 1868 when Prudent Beaudry, Dr. John S. Griffin and Solomon Lazard formed the Los Angeles City Water Company after negotiating a thirty year contract with the City for the domestic water rights.[33] Although the Los Angeles City Water Company had met with natural disasters like storms and floods, their investment proved successful and by November 1869, seven miles of two inch iron pipes had been laid, and a new water wheel was completed on the other side of the Roman Catholic Cemetery located along what is today Broadway.[34] The Los Angeles City Water Company was also successful enough to buy out other private water systems that had been developing in Los Angeles, particularly during the real estate boom of the 1880s. They also purchased artisan wells and springs. By the 1890s, the Company controlled all of the domestic water systems in and around the city of Los Angeles.[35] After the 30 year lease agreement with the Los Angeles City Water Company ended, control over the Los Angeles water system again reverted back to the City. Los Angeles financially compensated the Company for the value of the water system. In 1901, three years after the end of the lease, the Company accepted an offer to sell back the water rights to the City. Starting February, 1902, domestic water distribution again became a municipal operation.[36]

Even as domestic water rights were being leased out, the City continued to maintain control of the zanja system

[27] Hall, op. cit., 565.
[28] Le Val Lund, former employee of the Los Angeles Department of Water and Power, personal interview, 13 April 2007.
[29] Hoffman and Stern, op. cit., 8.
[30] Costello and Wilcoxon, op. cit., 28a, 30.
[31] Hoffman and Stern, op. cit., 10.
[32] Hoffman and Stern, op. cit., 11.
[33] Spriggs, "Water for a Thirsty City," op. cit., 14.
[34] Hoffman and Stern, op. cit., 13.
[35] Hoffman and Stern, op. cit., 17.
[36] Hoffman and Stern, op. cit., 19.

of gravity-flow water for irrigation.[37] In fact, the City never lost control of the Zanja Madre and its branches. This open ditch system remained essentially the same throughout most of the nineteenth century, servicing the farm lands that still made up most of Los Angeles.

Improvements made to the Zanja System

In 1877, a decision was made to make improvements to the zanja system. This included lining about 8,000 feet of the Zanja Madre with concrete from the Los Angeles River to Aliso Street. Efforts were also made to provide water to areas east of the river, such as Boyle Heights and East Los Angeles.[38] A 3,320 foot long tunnel was constructed along the soft sandstone of the bluff, connecting to the wood dam near the current Riverside Drive Bridge location. This tunnel, however, was not successful. It caved in, and although attempts were made to repair it, the system was ultimately abandoned after a flood in 1884 took away the wooden pile dam. The old Zanja Madre system including the toma was reinstated.

After the 1884 flood, further improvements were made to the zanja system. This included repairing the tunnel at the head of the Zanja Madre, then encasing the Zanja Madre from the tunnel to First Street.[39] A new dam was also constructed. By 1888, 3,300 feet of the Zanja Madre was an embanked channel from the head; 3,600 feet from the Los Angeles River was masonry lined; 1,800 feet consisted of a three feet diameter conduit to the Capitol Mills Company, with a drop of 18 feet for power utilization; and 4,900 feet of a 3.5 feet diameter brick conduit to the end of First Street.[40] The nominated section of the Zanja Madre is part of the three feet diameter section leading up to Capitol Mills. The Zanja Madre by this time supplied two irrigation heads each to Zanjas 3, 4, 5 and 8. The nominated brick section of the Zanja Madre carried about 24 cubic feet per second, or four cubic feet per second per head.[41] This core section of the water system, then led into branches that consisted of 30 inch diameter concrete or iron pipes within the City, and then as open ditches beyond.[42] By encasing the ditches, they were better protected from future floods, evaporation, and contamination from people misusing the zanja waters.

End of an Era

The City of Los Angeles finally got complete control over the Los Angeles River water, both above and below ground in a 1899 California State Supreme Court hearing, Los Angeles v. Pomeroy, which upheld the city's rights to the entire flow of the Los Angeles River.[43] However, by this time, the era of accessing water from the Los Angeles River via the zanjas was coming to an end. Attempts to improve the system were ultimately unsuccessful. In addition, the City of Los Angeles was just growing too fast. The Los Angeles population increased five times by 1890 after the Southern California real estate boom of 1886-87, and the city only continued to grow.[44] Many of the former farmlands within the city were being subdivided for commercial and residential development. This decreased the need for irrigation water in Los Angeles. Meanwhile, irrigation needs did increase outside the city limits during this time. This need made the zanja system useful for at least a little while longer.[45]

However, by spring of 1904, the Zanja system was abandoned, although some of the conduits were adapted to use for storm water and sewer systems.[46] George Douglas Pessell was the last zanjero. Long gone were the

[37] *An Illustrated History: Los Angeles County, California…*, op. cit., 264-65.
[38] Hoffman and Stern, op. cit., 14.
[39] Hall, op. cit., 568.
[40] Hall, op. cit., 544.
[41] Hall, op. cit., 551.
[42] Gust, op. cit., 28.
[43] Hoffman and Stern, op. cit., 8.
[44] Hoffman and Stern, op. cit., 19.
[45] Hall, op. cit., 556.
[46] Hoffman and Stern, op. cit., 19.

days of a small pueblo with a handful of people. The fast growing city doubled its population between 1890 and 1900 from 50,395 to 102,479. Each year there was less and less farmland to irrigate and more commercial and residential needs. The City needed to find a new means of obtaining water for a new century. Appropriately, Los Angeles had just regained control of the domestic water system in the city in 1902. Two years later, William Mulholland and Fred Eaton would visit the Owens Valley in Inyo County to investigate this as a new potential source of water. This visit resulted in a revolutionary and new source for water that kept up with the ever increasing demands of a growing city. This new 259 mile long system was completed in 1913 and continues to serve Los Angeles today. Mulholland had a long career with Los Angeles water. It began in 1878 when he became deputy zanjero and was responsible for maintaining the section of the Zanja Madre between the Los Angeles River and the Elysian Park Reservoir. Two years later, Mulholland helped construct the domestic water mains for the Los Angeles City Water Company. He later became the zanjero and was then appointed superintendent of the Company in 1886, a position he retained even after Los Angeles regained control over domestic water.[47]

The Zanja Madre Today

There are no remnants left of the open ditches that once graced the Los Angeles pueblo. It is widely understood that subsequent development, such as the construction of the Southern Pacific Railroad buildings and structures, have destroyed most of the brick lined Zanja Madre. Two other remaining segments have, however, been discovered and unearthed since 1978. In that year, a section of the Zanja Madre was found behind the Francisco Avila Adobe located along Olvera Street, which is now part of El Pueblo de Los Angeles Historic Monument. This Adobe, which still stands, is known as the oldest existing residence in Los Angeles. The eleven foot section of the Zanja Madre is still exposed as part of a museum exhibit inside the basement level of the Avila Adobe annex (located behind the original adobe building). Another section of the Zanja Madre was exposed and found by amateur archaeologists Craig Howell and Melody Carver in 2000, southeast of the nominated section of the Zanja Madre; both are located along the same bluff. This five foot section is located just east of the Capitol Mills Building. The land was formerly owned by the Southern Pacific Railroad, but is today owned by the San Antonio Winery. Both of these sections are identical in diameter to the nominated segment, although they are not as long. To date, the 75 foot long nominated structure is by far the longest and most intact section of the Zanja Madre that is known to exist and that has been unearthed.

Criterion A Eligibility

The Zanja Madre is eligible for the National Register of Historic Places under Criterion A for its association with an event that has made a significant contribution to the broad patterns of our history. The Zanja Madre was first constructed in 1781 when the original Los Angeles pueblo was established in that same year. This open ditch served all of the water needs of the community, whether for homes, farming or industry. This water conveyance system was the critical factor in the establishment and monumental growth of the City of Los Angeles during the subsequent decades. By the late 1860s, the Zanja Madre no longer provided domestic water because pipes had been laid to convey water directly to the homes. The old system was retained, however, for irrigation and industrial uses. During the 1880s, the Zanja Madre was enclosed in order to make the system more efficient and to keep the water purer. The nominated section of the conduit was enclosed with red bricks with a cementitious mortar, and has a diameter of about 3 feet. The City of Los Angeles was growing faster than anyone could ever have imagined. The newly enclosed Zanja continued to serve the city of Los Angeles until 1904 when the system was abandoned. Instead, a completely new water source and system was needed for a new century.

[47] Thomas Brooks, *Notes on Los Angeles Water Supply,* Los Angeles: (no publisher), 1938, [i].

The nominated Zanja Madre segment is an excellent reminder of the important role water played in the development of the City of Los Angeles. At 75 feet, the nominated segment is by far the longest section that has been unearthed. Two other shorter sections have been discovered; the one located within the Avila Adobe annex on Olvera Street is eleven feet long, and a segment discovered on the San Antonio Winery property is only five feet long. The nominated section's boomerang shape is reflective of the winding nature of the Zanja Madre, which did not follow a straight line, but instead followed the natural curves of the terrain. The structure is a significant and important remnant of the water system in Los Angeles during the nineteenth century.

9. Major Bibliographical References

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10. Geographical Data

Verbal Boundary Description

The legal parcel number is 5414-016-805. The Los Angeles County Assessor parcel map identifies this parcel as the "Los Angeles County Metropolitan Transportation Authority Easement." Within the parcel, the 75 foot long nominated resource is located about 1,100 feet to the northeast from the southwest end of this linear-shaped parcel. The boundaries of the nominated property are those of the structure itself. A narrow strip of privately owned land, which acts as a bluff, is located directly to the northwest. The parcel to the southeast is currently the Los Angeles State Historic Park owned by the State of California.

Boundary Justification

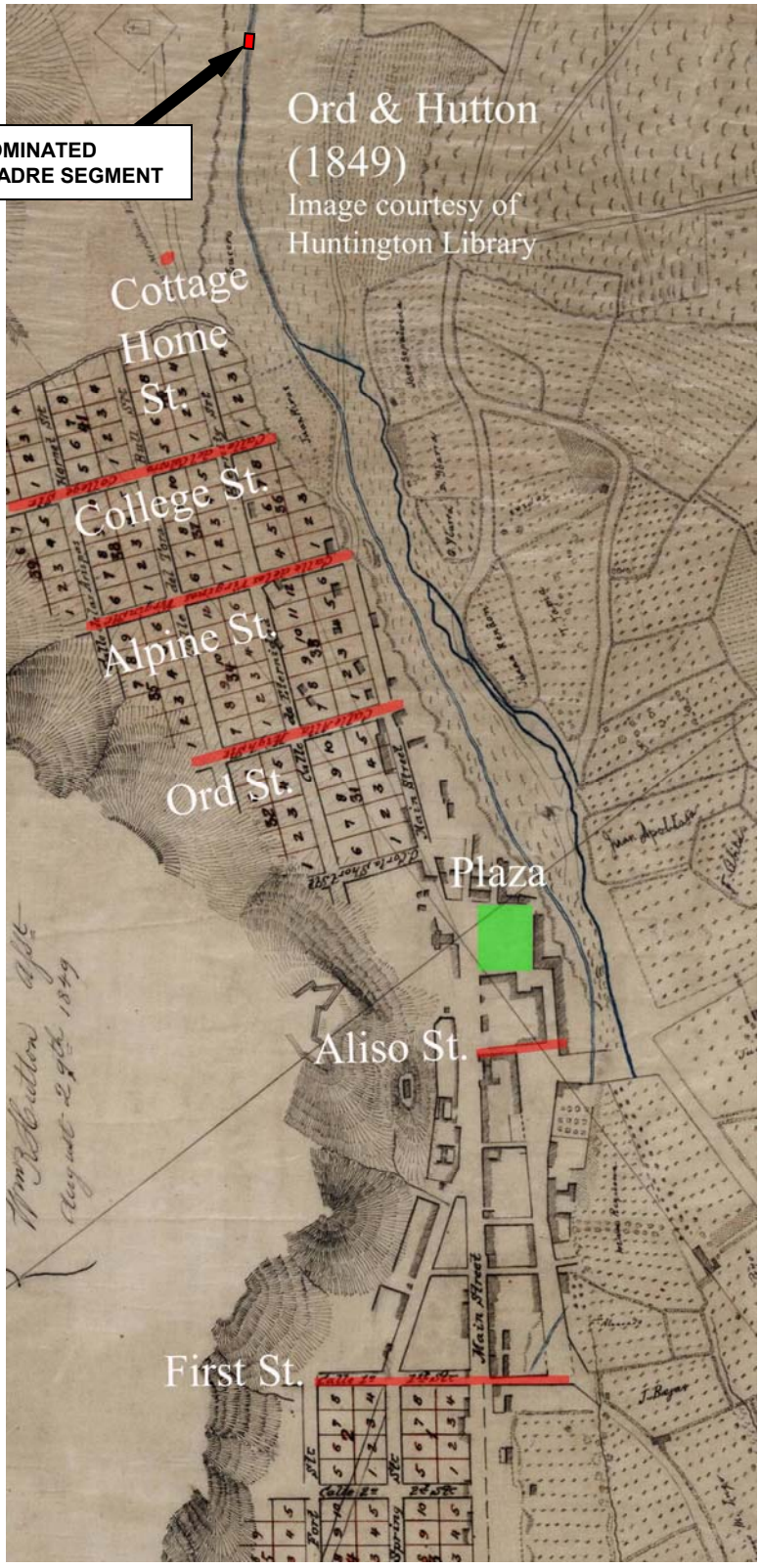
The boundaries were determined to be those of the nominated segment itself. This section of the Zanja Madre is isolated and detached from the other segments that are known to exist further southwest near the Capitol Mills Company, and behind the Avila Adobe that is part of Olvera Street. The resource itself, without its immediate surroundings, conveys its significance.

Maps

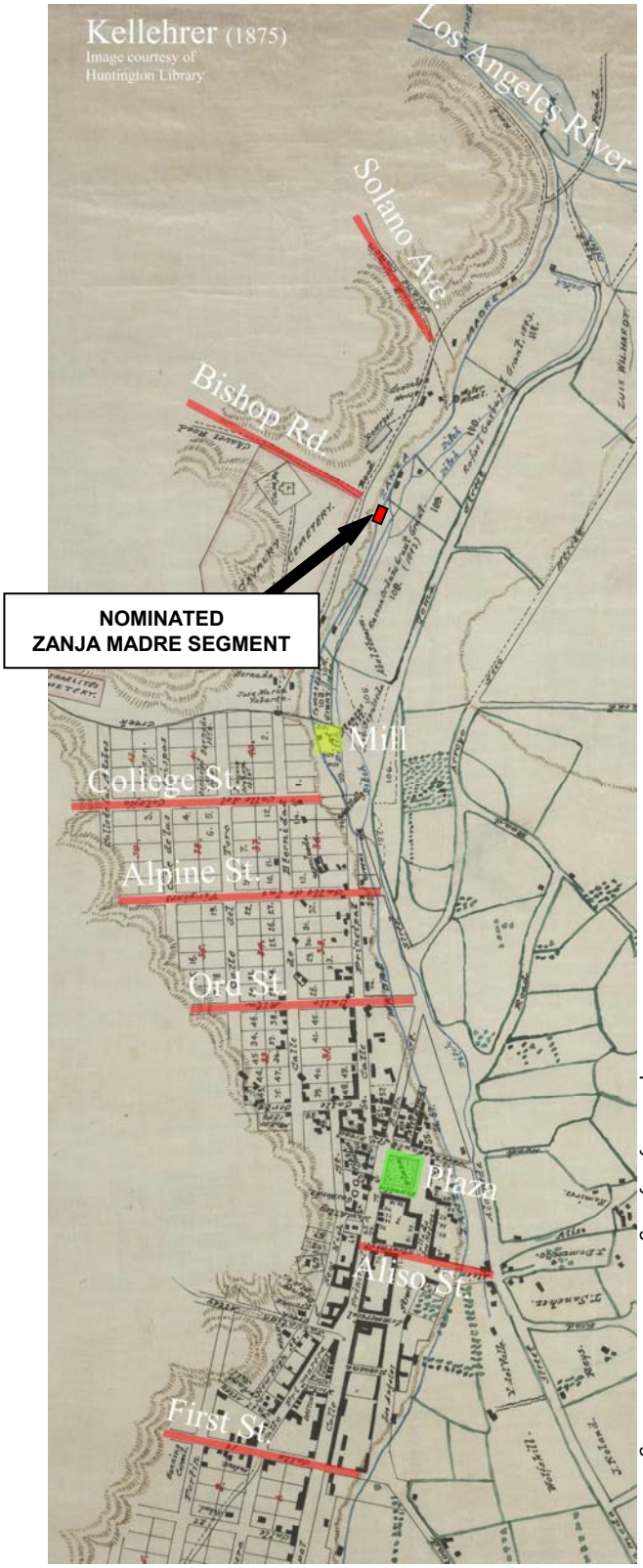
Current Site Plan of the Nominated Segment of the Zanja Madre



Historic Maps Showing the Zanja Madre System

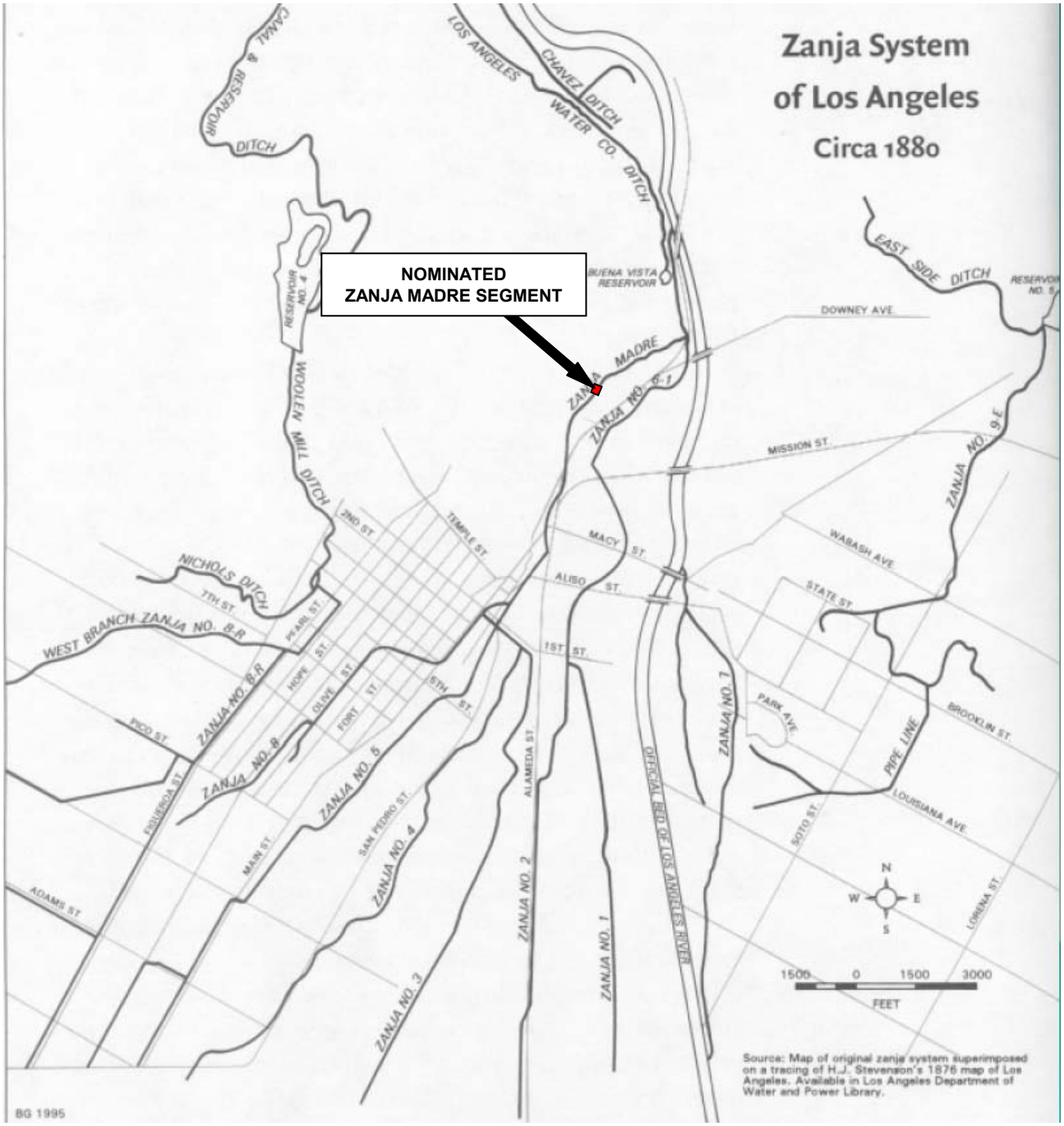


Map overlays by Cogstone Resource Management Inc.



Map overlays by Cogstone Resource Management Inc.

Circa 1880 Map of the Entire Zanja System



Map courtesy of Blake Gumprecht's *The Los Angeles River: its life, death, and rebirth*

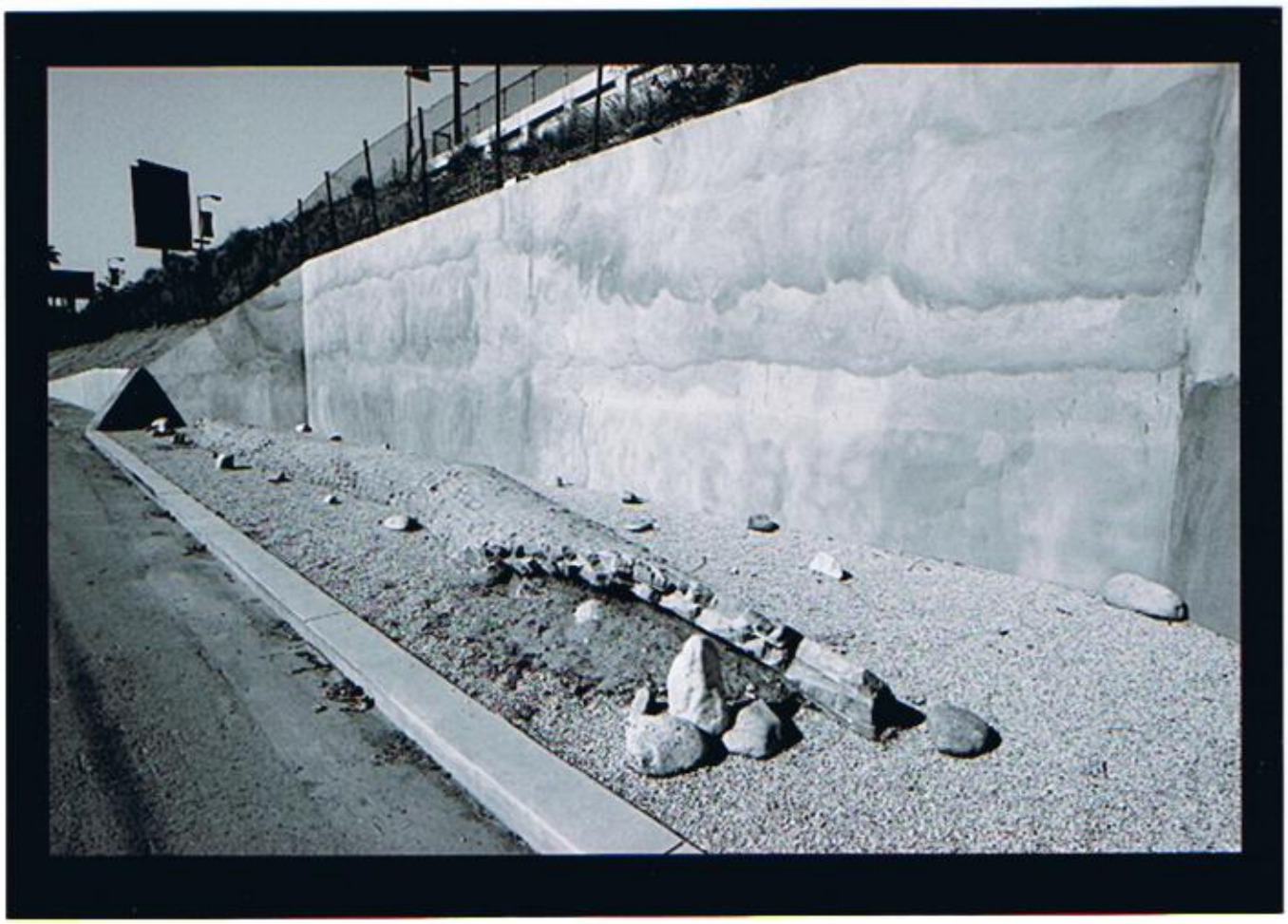
PHOTOGRAPH LOG

The following information pertains to photograph numbers 1- 15 except as noted:

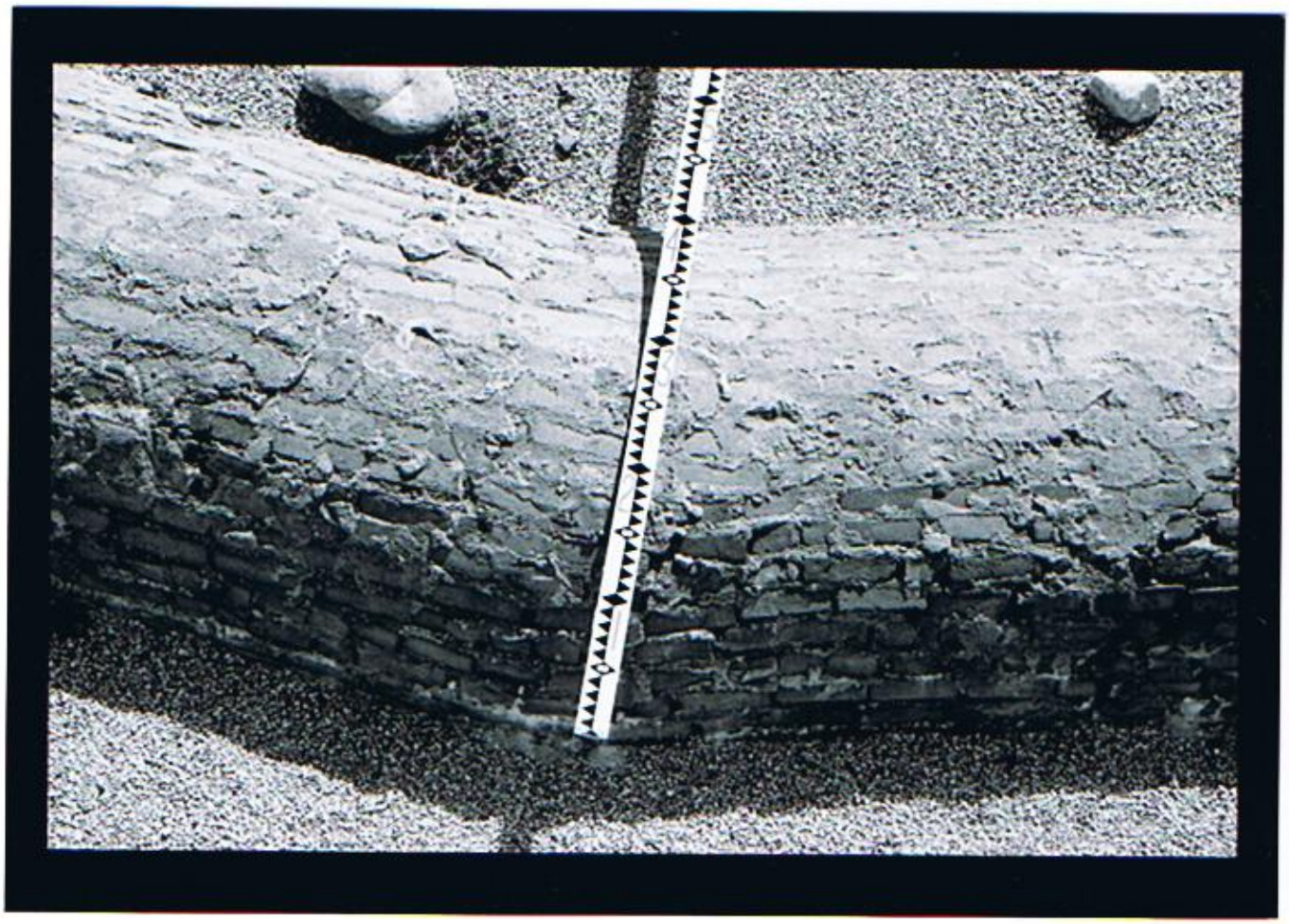
Photographer: Stephen Schafer
Date of Photographs: October 31, 2007
Negatives Location: Schaf Photo Studios
1790 E. Main Street
Midtown Ventura, CA 93001

Photo No.	Photographic Information
1	Elevated view looking southwest at the Zanja Madre
2	Elevated view looking east at the Zanja Madre
3	View looking northwest at the Zanja Madre from ground level
4	View looking northeast at the Zanja Madre from ground level
5	View looking down at the middle section of the Zanja Madre
6	View looking down at the “bend” of the Zanja Madre
7	View looking northwest at the southwest end of the Zanja Madre
8	View looking southwest at the northeast end of the Zanja Madre
9	Detailed view looking northeast at the southwest end of the Zanja Madre
10	Detailed view looking northwest near the northeast end of the Zanja Madre
11	View looking northwest near the southwest end with the “seam” visible
12	View looking east, with the Zanja Madre in the foreground and the MTA train in the background
13	View looking north, with the Zanja Madre in the middle ground and the bridge over the Los Angeles River in the background
14	Elevated view looking southwest at the Zanja Madre (color)
15	View looking down near the northeast end of the Zanja Madre (color)



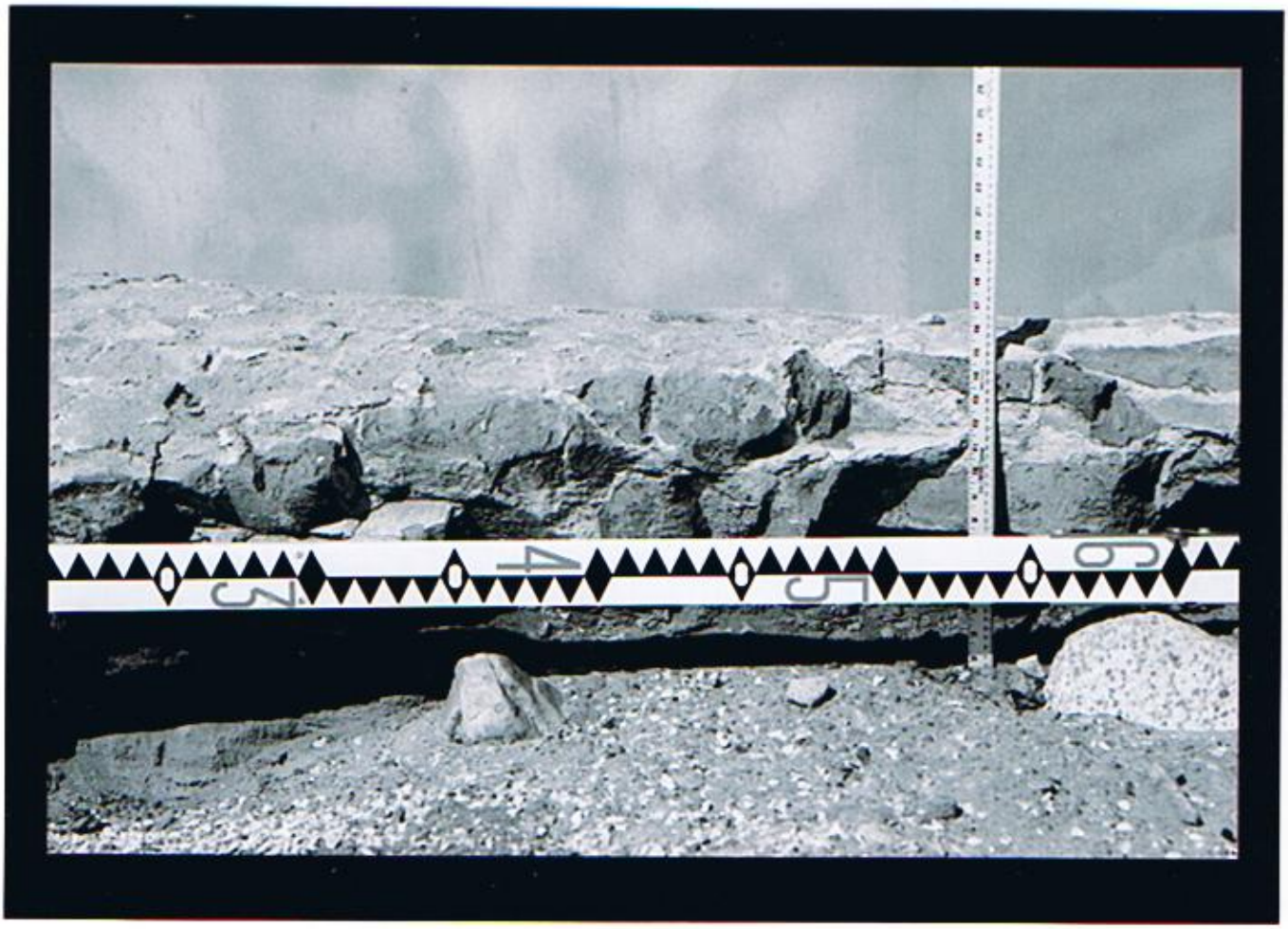


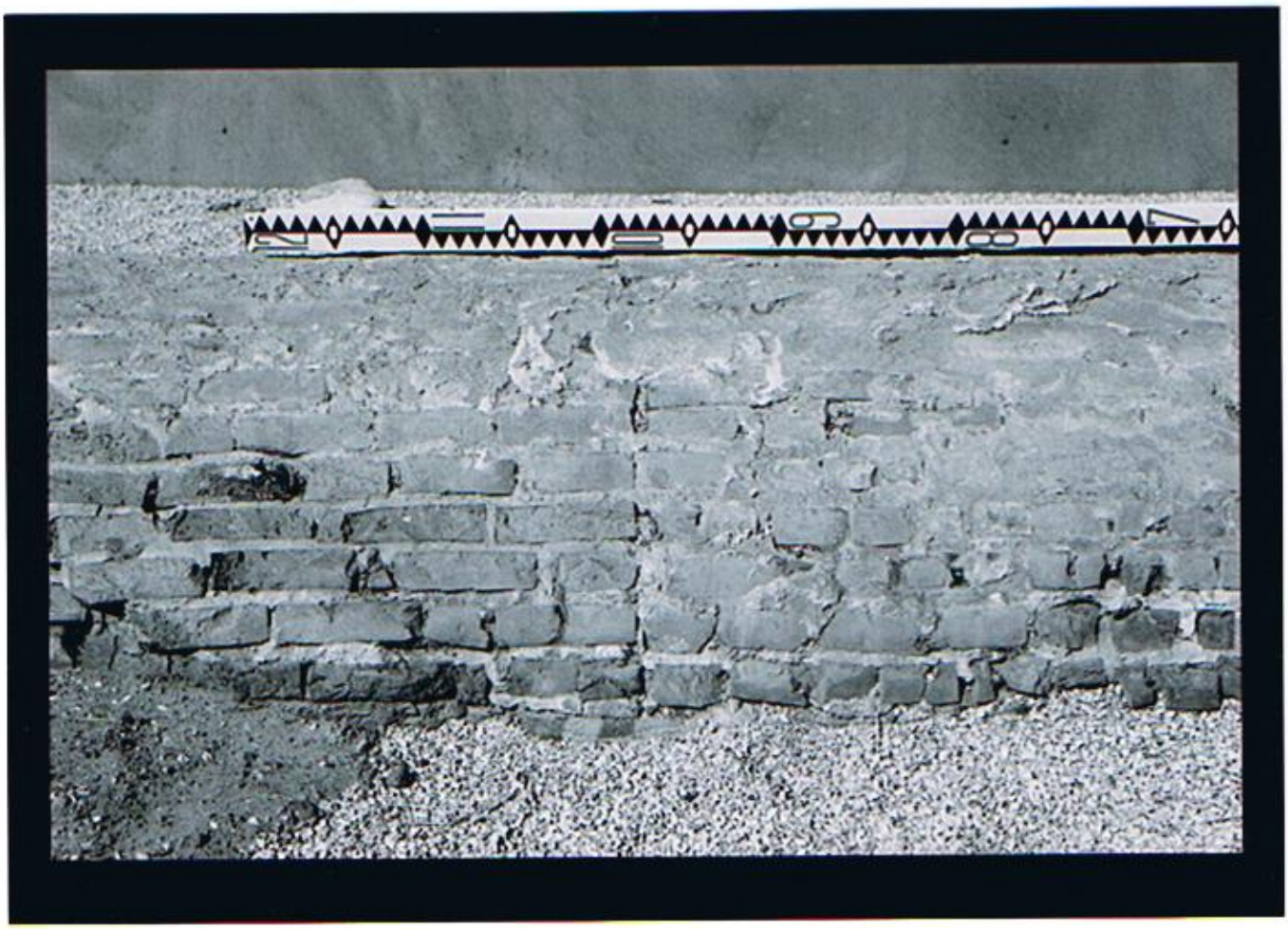


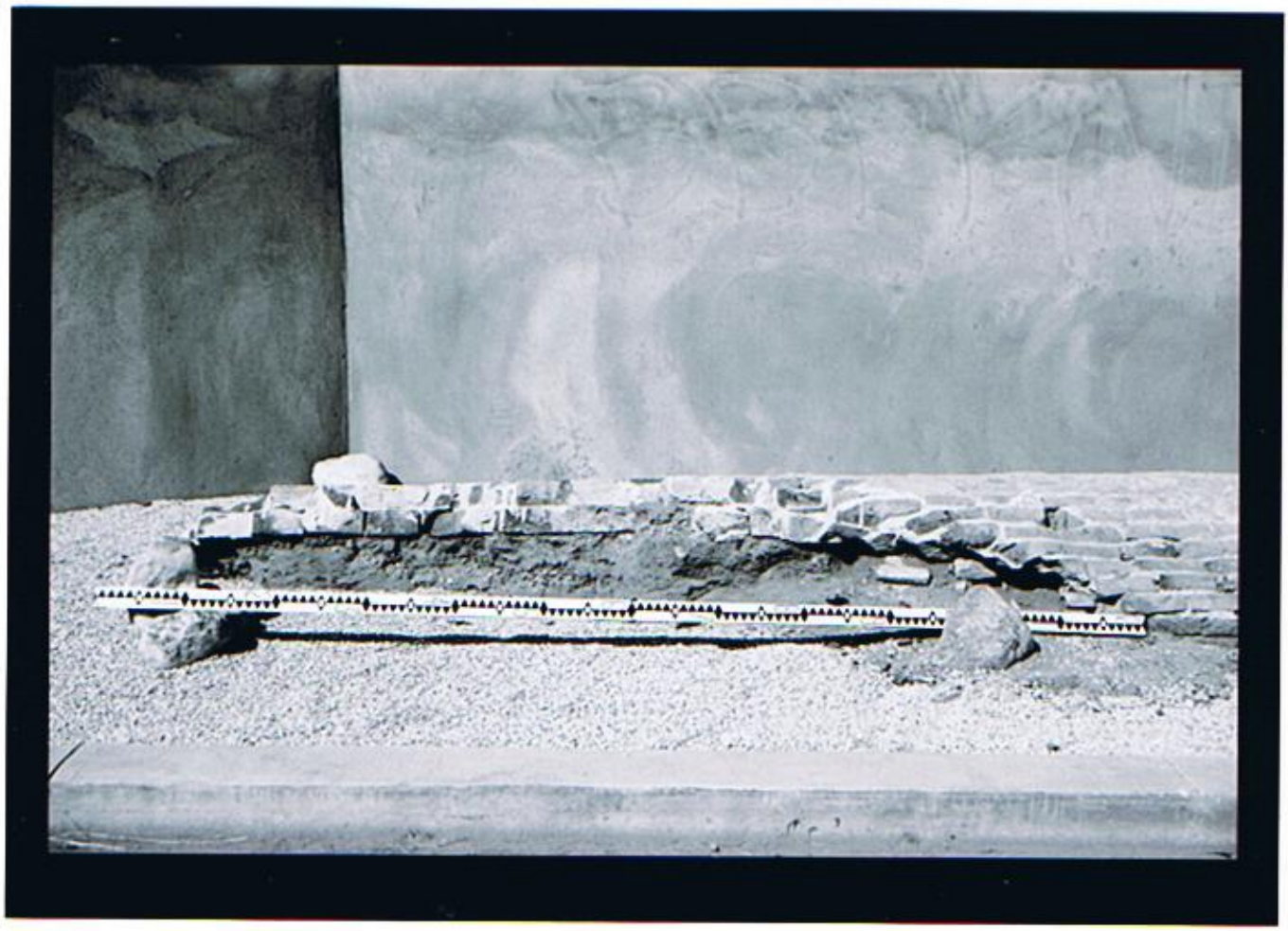






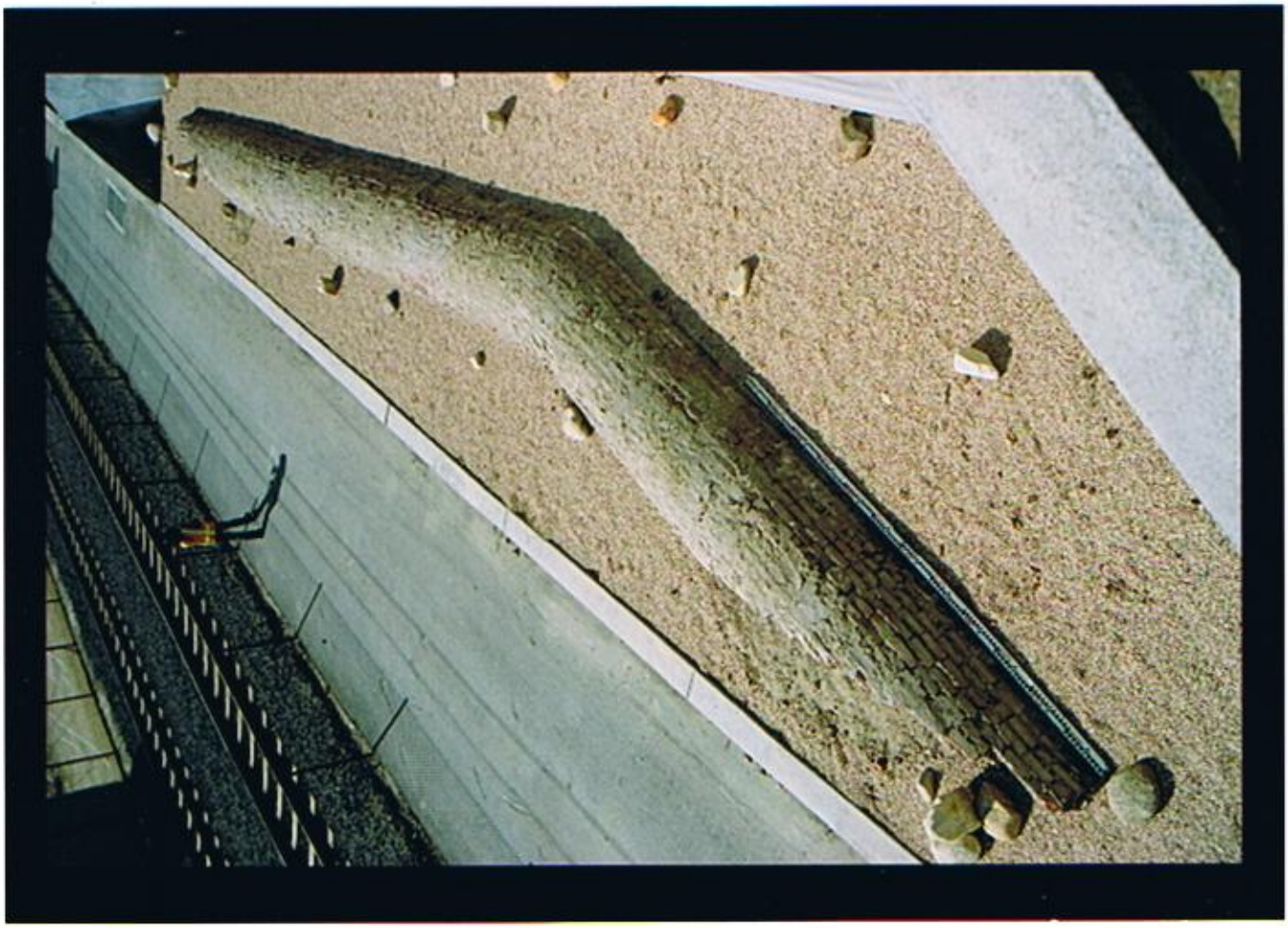


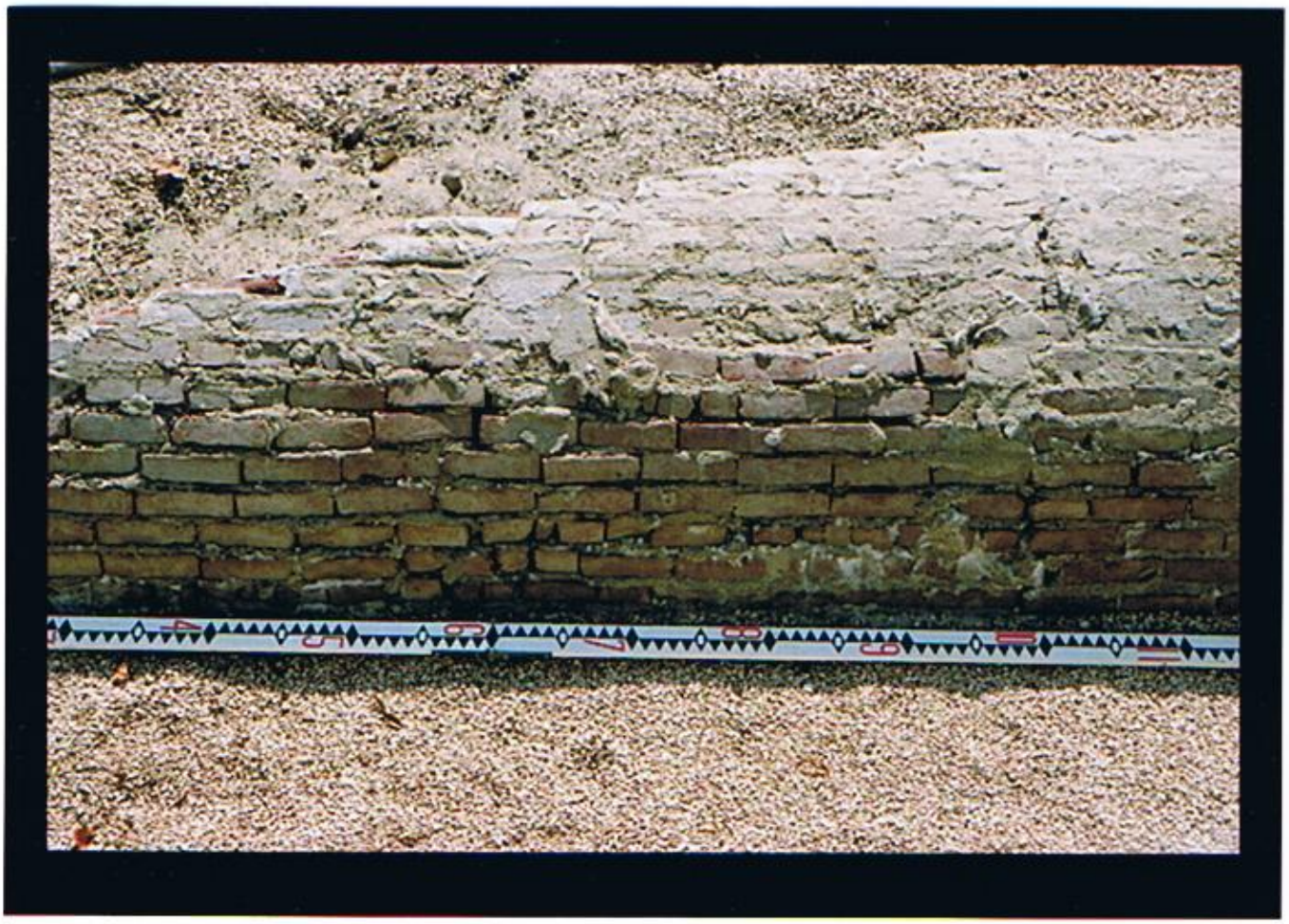
















19-190309



Portions of the 'zanja madre' at Blossom Plaza, Chinatown, April 14, 2014 | Photo by William Preston Bowling

L.A.'s Historic 'Mother Ditch' Discovered in Chinatown (http://www.kcet.org/socal/departures/lariver/confluence/river-notes/las-historic-mother-ditch-discovered-in-chinatown.html)

By Carren Jao |
April 15, 2014

- RELATED TOPICS
- City Planning (http://www.kcet.org/socal/departures/topics/city-planning/)
- History (http://www.kcet.org/socal/departures/topics/history/)

Last week, the construction crew for Chinatown's Blossom Plaza development uncovered a momentous find: about 200 feet of the Zanja Madre (or the "Mother Ditch"). A lifeline for early Los Angeles, the Zanja Madre (http://www.kcet.org/socal/departures/lariver/yangna/the-zanja-madre.html) carried precious water from the Los Angeles River (http://www.kcet.org/socal/departures/lariver/) right into the blossoming pueblo that would one day grow into the busy metropolis we know as Los Angeles.

"We're trying to determine how best to keep the whole structure intact, preserve it and have it be displayed for the benefit of the public," said Fredy Ceja, Communications Deputy for Councilman Gilbert Cedillo, whose Council District 1 includes Chinatown.

19-190309

As a result work on Blossom Plaza, a $100-million project from Forest City Enterprises that would create 237 apartments in the area, has momentarily drawn to a halt. Forest City's archeological team has been photographing and documenting the discovery in preparation for a full report.

Though there is no set timeline for any resolution, the work stoppage will not go on for long, says Ceja. "We want to do both. We don't want to impede on the development at Blossom Plaza, but we also want to make sure we're able to preserve the piece."

The district office is already in talks with artist Lauren Bon, who's exploring the possibility of incorporating this find into Metabolic Studio's $10-million **Water Wheel project** (http://www.kcet.org/socal/departures/lariver/confluence/river-notes/yesterdays-water-system-back-in-los-angeles.html), which will erect a 70-foot steel water wheel to irrigate the area. The office is also working with Forest City, the Office of Historic Resources, and State Parks to see whether it can be incorporated into the pre-existing plans for Blossom Plaza or Los Angeles State Historic Park, which just **began its overhaul** (http://www.kcet.org/socal/departures/lariver/confluence/river-notes/los-angeles-state-historic-park-gets-an-overhaul-community-concerned-about-future-programs.html).

L.A.'s **original aqueduct was completed in 1781** (http://www.kcet.org/socal/departures/lariver/confluence/river-notes/yesterdays-water-system-back-in-los-angeles.html), within a month of the founding of the pueblo. Originally an open, earth ditch, the water source was used by residents for regular duties such as washing and cooking, as well as irrigating crops. Over the years, the ditch has undergone a few alterations, including constructing a brick tunnel that would enclose the waterway, remnants of which were found by the construction crew.

19-190309



Portions of the 'zanja madre' Blossom Plaza, Chinatown, April 14, 2014 | Photo by William Preston Bowling

19-190309



Photo courtesy of Miguel Luna

19-003650 19-003650

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code
Other Listings
Review Code Reviewer Date

Page 1 of 3 *Resource Name or #: S- 2005LMM1004

P1. Other Identifier: Bovinae Cranial fragments
*P2. Location: ☒ Not for Publication ☐ Unrestricted Los Angeles*a. County: Los Angeles
and (P2b and P2c or P2d. Attach a Location Map as necessary.)
*b. USGS 7.5' Quad: Los Angele Date: 1966 MINOR REVISIONS 1994 T 1 South ; R 13 West ; NE ¼ of SW ¼ of Sec 22 ; M.D. B.M.
c. Address: City: Los Angeles Zip:
d. UTM: Zone: 11 ; 386283 mE/ 3770250 mN (G.P.S.)
e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate) Elevation: Within the Cornfield Rail Road Yard

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)
A not in situ collection of Bovinae skull fragments. It is believed that these were originally associated with the Sanora Town of Los Angeles

*P3b. Resource Attributes: (List attributes and codes) AH4 Dump Trash Scatter
*P4. Resources Present: ☐Building ☐Structure ☐Object ☒Site ☐District ☐Element of District ☐Other (Isolates, etc.)

P5a.



P5b. Description of Photo: (View, date, accession #)

*P6. Date Constructed/Age and Sources: ☒Historic ☐Prehistoric ☐Both

*P7. Owner and Address:

*P8. Recorded by: (Name, affiliation, and address)
Leann Moore
Cogstone Resource Managment
1801E.ParkcourtPl.,Bldg.B,Suite102
SantaAna,CA92701
714-245-0264 ph

*P9. Date Recorded: 10-04-2005
*P10. Survey Type: (Describe)
Trenching Monitoiring

*P11. Report Citation: (Cite survey report and other sources, or enter "none.") 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 (List):

DPR 523A (1/95) *Required information

19-003650

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
ARCHAEOLOGICAL SITE RECORD

Primary #
Trinomial

 *Resource Name or #: S- 2005LMM1004

*A1. Dimensions: a. Length: m. (1) × b. Width: m. (1)
Method of Measurement: ☐ Paced ☐ Taped ☒ Visual estimate ☐ Other:
Method of Determination (Check any that apply.): ☐ Artifacts ☒ Features ☐ Soil ☐ Vegetation ☐ Topography
☐ Cut bank ☐ Animal burrow ☐ Excavation ☐ Property boundary ☐ Other (Explain):

Reliability of Determination: ☐ High ☒ Medium ☐ Low Explain:

Limitations (Check any that apply): ☐ Restricted access ☒ Paved/built over ☐ Site limits incompletely defined
☐ Disturbances ☐ Vegetation ☐ Other (Explain):

A2. Depth: ☐ None ☐ Unknown Method of Determination:
*A3. Human Remains: ☐ Present ☒ Absent ☐ Possible ☐ Unknown (Explain):

*A4. Features (Number, briefly describe, indicate size, list associated cultural constituents, and show location of each feature on sketch map.): A not in situ collection of Bovinae skull fragments. It is believed that these were originally associated with the Sanora Town of Los Angeles

*A5. Cultural Constituents (Describe and quantify artifacts, ecofacts, cultural residues, etc., not associated with features.):

*A6. Were Specimens Collected? ☐ No ☒ Yes (If yes, attach Artifact Record or catalog and identify where specimens are curated.)
*A7. Site Condition: ☐ Good ☐ Fair ☒ Poor (Describe disturbances.): This deposite was probably moved to it current location with the grading of Broadway Street.

*A8. Nearest Water (Type, distance, and direction.): Los Angeles River ½ mile East
*A9. Elevation: 89 meters
A10. Environmental Setting (Describe culturally relevant variables such as vegetation, fauna, soils, geology, landform, slope, aspect, exposure, etc.): This site was found within the slope oF fill from the grading of Broadway road.

A11. Historical Information: Found next to the Zanja

*A12. Age: ☐ Prehistoric ☐ Protohistoric ☐ 1542-1769 ☐ 1769-1848 ☒ 1848-1880 ☐ 1880-1914 ☐ 1914-1945
☐ Post 1945 ☐ Undetermined Describe position in regional prehistoric chronology or factual historic dates if known:

A13. Interpretations (Discuss data potential, function[s], ethnic affiliation, and other interpretations): This sit is believed to be a reworked deposite of animal bones. This site was moved by the construction related to the building of broadway road. It is also believed to have originally been associated with Sonora town were bull fights would have taken place during the early period of Los Angeles

A14. Remarks:

A15. References (Documents, informants, maps, and other references):

A16. Photographs (List subjects, direction of view, and accession numbers or attach a Photograph Record.):

Original Media/Negatives Kept at:
*A17. Form Prepared by: Steven McCormick
Affiliation and Address: 1801 E. Parkcourt Pl. St B-102, Santa Ana, CA. 92701
Date: November 10, 2006

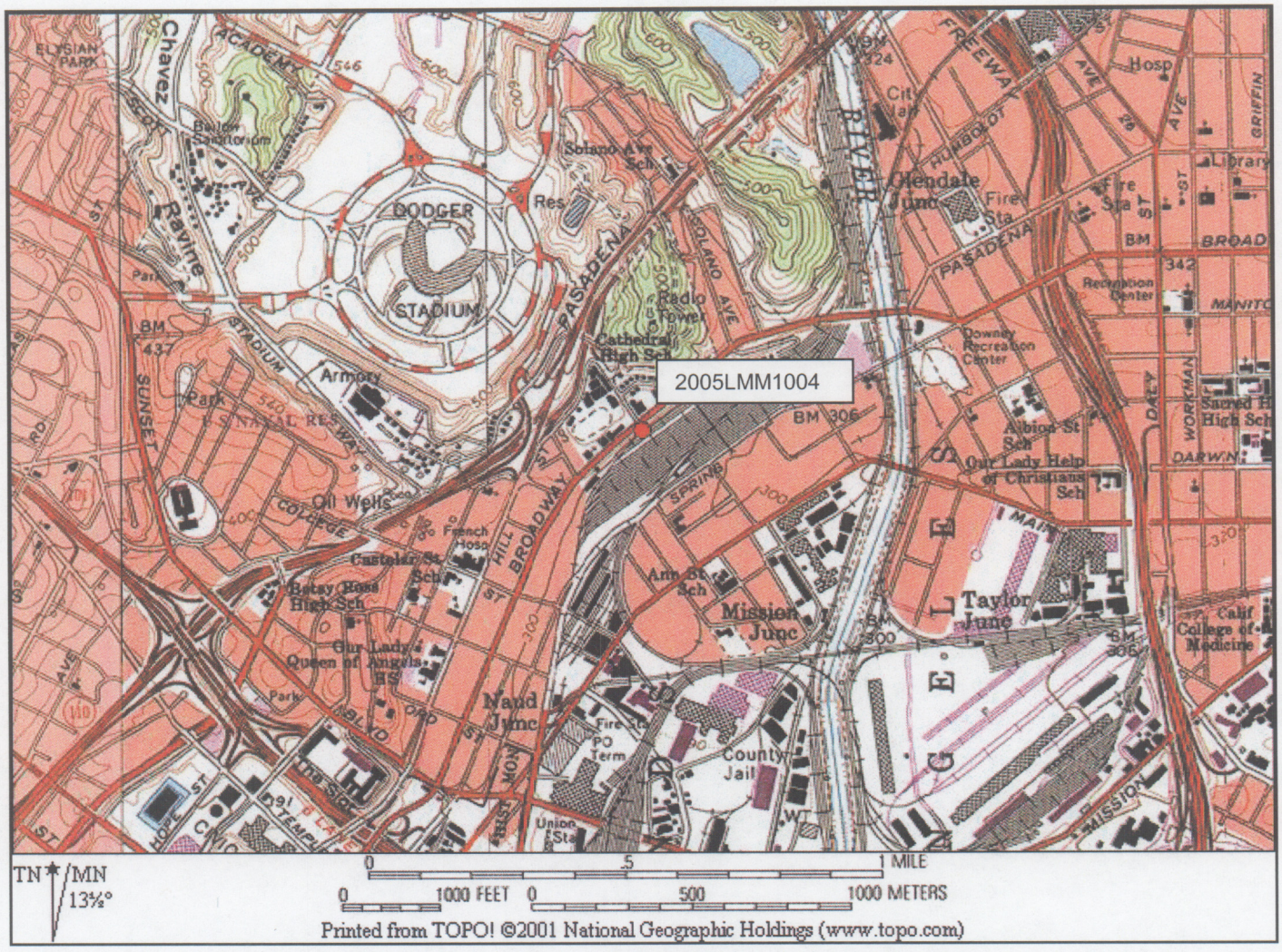
*Required information

19-003650

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
LOCATION MAP

Primary #
HRI#
Trinomial

*Resource Name or #: 2005LMM1004



*Map Name: **Los Angeles 7.5′ Quadrangel** *Scale: **1:24,000** *Date of Map: **November 10, 2006**

*Required information

LA-08512 8512

RELATIONSHIP OF THE ZANJA MADRE TO MTA'S GOLD LINE PROPERTY IN RIVER STATION YARD, CITY OF LOS ANGELES, CALIFORNIA

Pg:32
Ty:(Arch. Survey
AC: 3

Div.(20)
Resource
Assessment
Quad. Los
Angeles
1103

Submitted to:

Pg:

UltraSystems Environmental, Inc.	Metropolitan Transportation Authority
100 Pacifica, Suite 250	One Gateway Plaza
Irvine, CA	Los Angeles, CA

Prepared by:

Fi: Cogstone Resource Management Inc.
1801 Parkcourt Place, Suite Bldg. B, Suite 102
Santa Ana, California 92701
(714) 245-0264 cogstone@hotmail.com

CR: River Station Yard
(LACM No. 82),
Zanja Madre,
19.003100
19.003101
19.003102
19.003103

Authors:

Au: Sherri Gust and Mari Pritchard Parker

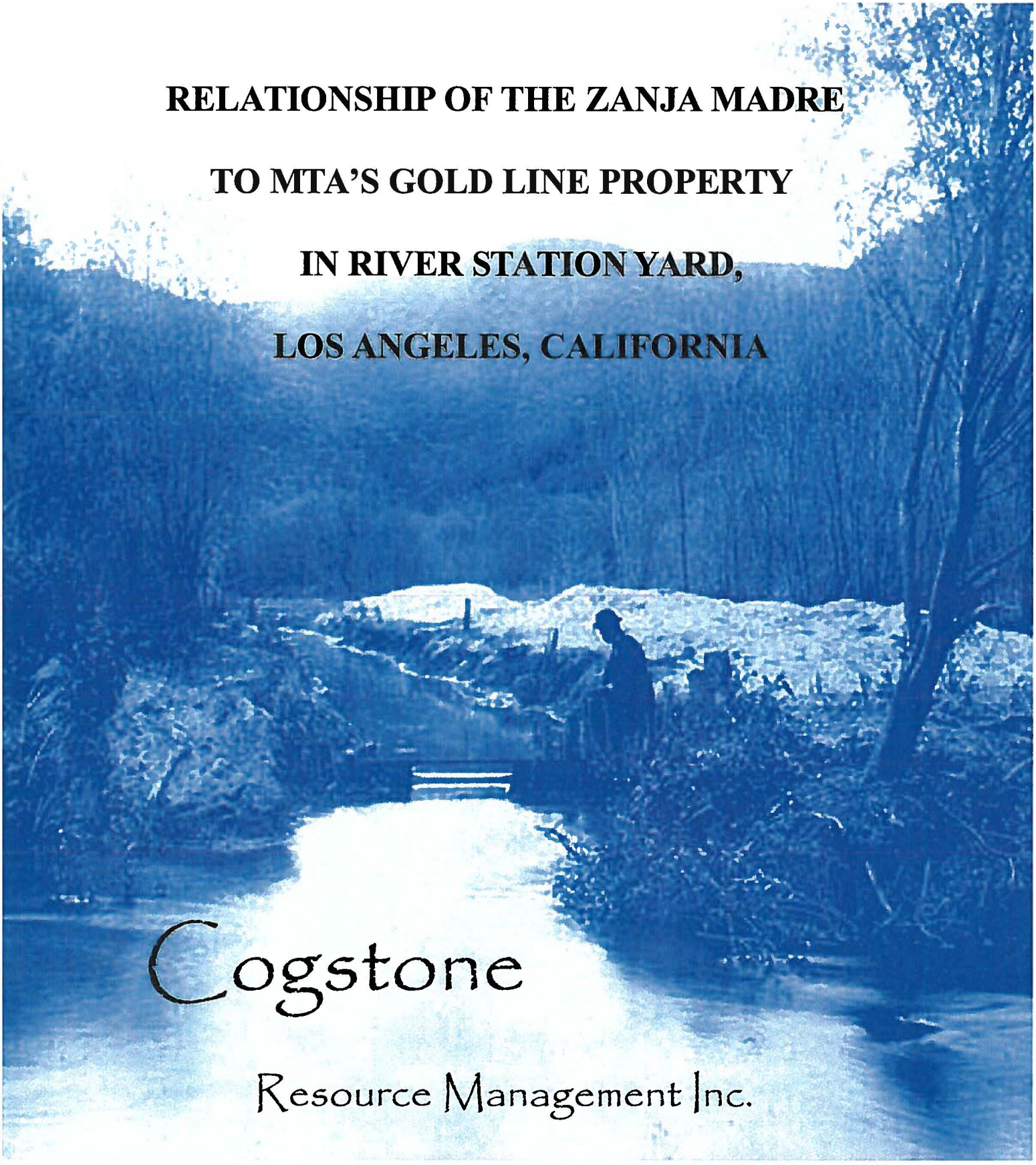
Principal Investigator:

Mari Pritchard Parker,
Registered Professional Archaeologist

Da: **July 2004**

LA-08512

RELATIONSHIP OF THE ZANJA MADRE TO MTA'S GOLD LINE PROPERTY IN RIVER STATION YARD, LOS ANGELES, CALIFORNIA



Cogstone

Resource Management Inc.

LA-08512

NATIONAL ARCHAEOLOGICAL DATA BASE (NADB) INFORMATION SHEET

RELATIONSHIP OF THE

ZANJA MADRE TO MTA'S GOLD LINE PROPERTY IN RIVER STATION,

CITY OF LOS ANGELES, CALIFORNIA

Submitted to:

UltraSystems Environmental, Inc.
100 Pacifica, Suite 250
Irvine, CA

Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA

Prepared by:

Cogstone Resource Management Inc.
1801 Parkcourt Place, Suite Bldg. B, Suite 102
Santa Ana, California 92701
(714) 245-0264 cogstone@hotmail.com

Authors:

Sherri Gust and Mari Pritchard Parker

Principle Investigator:

Mari Pritchard Parker,
Registered Professional Archaeologist

July 2004

Type of Study: Archaeological Evaluation
Sites: 19-003100, 19-003101, 19-003102, 19-003103
USGS Quadrangle: Los Angeles
Area: ~3 Acres
Key Words: Cornfield Yard, Midway Yard, Chinatown, River Station Yard, Zanja Madre, irrigation, Gold Line, Blue Line, Bullring, River Station, Los Angeles River, El Pueblo, Chinatown Yards

EXECUTIVE SUMMARY

Cogstone was retained to evaluate whether any remnants of the first irrigation ditch of Los Angeles, the Zanja Madre, exist on MTA's remnant property in River Station Yard. We conducted a record search, documentary research and a surface examination to evaluate that potential and determine possible locations for trenches to locate subsurface zanja remnants.

The project is located at the edge of modern-day Los Angeles Chinatown, north of the current city center in the River Station Yard. The River Station Yard is a large rail yard west of the Los Angeles River, immediately south of Broadway and north of Spring St. River Station tracks were continuous with tracks of Midway Yard, directly adjacent to the river but north of Broadway, and Cornfield Yard, south and slightly east of River Station. The project area is City of Los Angeles Cultural Monument Number 82 known as River Station Area/Southern Pacific Railroad.

There were three historical archaeological resources known within River Station Yard, probably associated with the Southern Pacific Railroad Company's River Station Pacific Depot and Hotel. Documentary sources, including historic illustrations, were consulted regarding the Zanja Madre and River Station Yard. The original zanja was an open, wide, shallow ditch from the Los Angeles River, past the Plaza, to the fields west of town. While some documentary sources report the Zanja Madre was an open ditch well into the American period, illustrations from the period provide an alternative explanation of the zanja as a closed conduit in the bluff above the original location.

Extensive testing along the base of the bluff below Broadway, the reported location of the original Zanja, revealed no evidence of the Zanja Madre. In contrast, three segments of brick conduit have been revealed set into the bluff and above the grade of the base. These segments follow the contour of the bluff and are on the approach to an historic building known to have been powered by the Zanja Madre.

No further testing on MTA's Gold Line property is recommended as diligent testing has already been performed along the alignment. The new State Park property is devoid of any historic association with the Zanja, although other historical archaeological resources are present. Sampling the mortar and brick of the exposed segments of brick conduit, testing for distribution and consultation regarding preservation options are recommended should alterations be considered on the private property where the possible Zanja remnants occur.

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INTRODUCTION

PURPOSE OF STUDY

Cogstone was retained to evaluate whether any remnants of the first irrigation ditch of Los Angeles, the Zanja Madre, exist on MTA's remnant property in River Station Yard. We conducted a record search, documentary research and a surface examination to evaluate the potential for remnants and to determine possible locations for trenches to locate subsurface zanja remnants.

PROJECT DESCRIPTION

The project is located at the edge of modern-day Los Angeles Chinatown, north of the current city center (Figure 1). River Station Yard is a large historic rail yard west of the Los Angeles River (Figure 2). It is immediately south of Broadway and north of Spring. River Station tracks are continuous with tracks of Midway Yard, directly adjacent to the river but north of Broadway, and Cornfield Yard, south and slightly east of River Station (Mullaly & Petty 2002:50). The

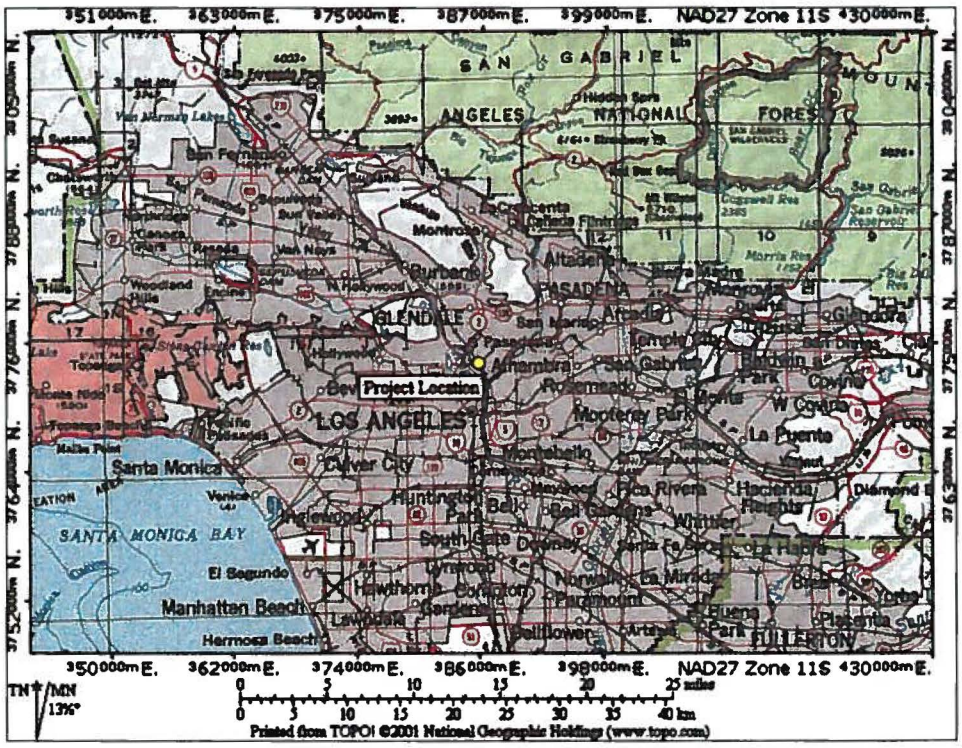

Figure 1. Regional Location Map

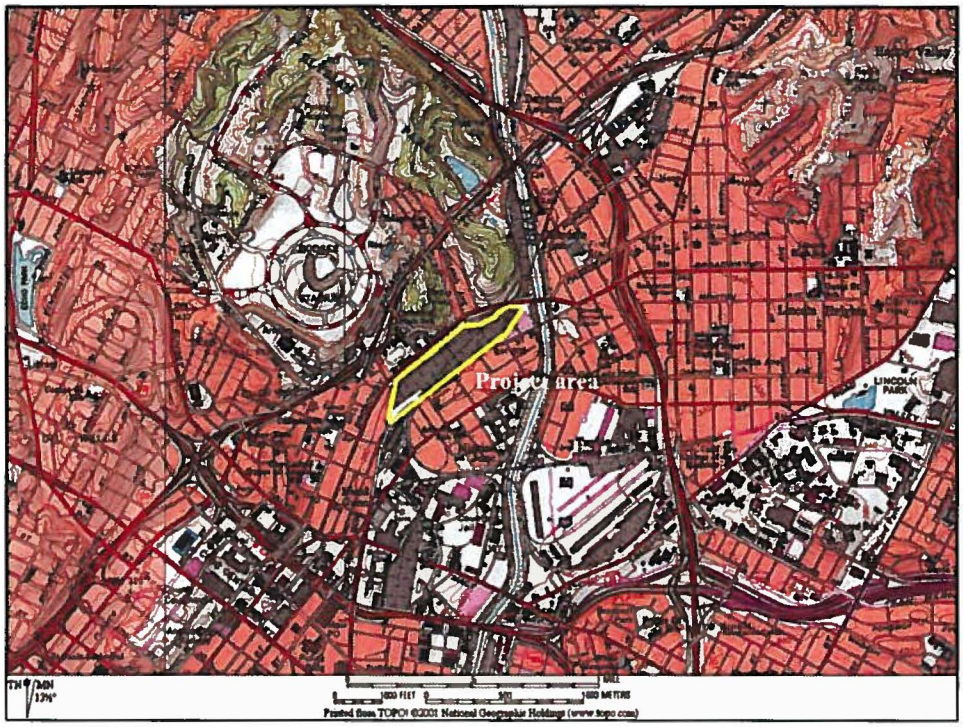

Figure 2. River Station Area Map

names and locations of these three yards have often been confused (LA Times 2000). Of the three yards, only River Station Yard had an actual train depot on the Southern Pacific line. The yard is City of Los Angeles Cultural Monument Number 82 known as River Station Area/Southern Pacific Railroad.

The MTA has retained ownership of only a small portion of River Station Yard corresponding to the Metro Rail Gold Line approach to Chinatown Station from the bridge across the Los Angeles River (Figure 3). The bulk of River Station has been purchased by California State Parks for rehabilitation as public space. This space has been called the "Cornfield" property in the political negotiations to acquire the space and designate appropriate uses (Clayton 2000, CSPAC 2003, Garcia et al. 2004, Gold 2001, Ramos 2000, Reynolds and Soto 2003) although there is no direct evidence corn ever grew there. Southern Pacific Railroad personnel interviewed stated that Cornfield Yard was an informal name for an area directly across Spring Street from the southwest end of River Station Yard where corn oil was offloaded to tanker trucks (C. Howell,

personal communication, 2004). The remaining portion of the original River Station Yard that parallels N. Broadway, and is north of the Gold Line, is private property.

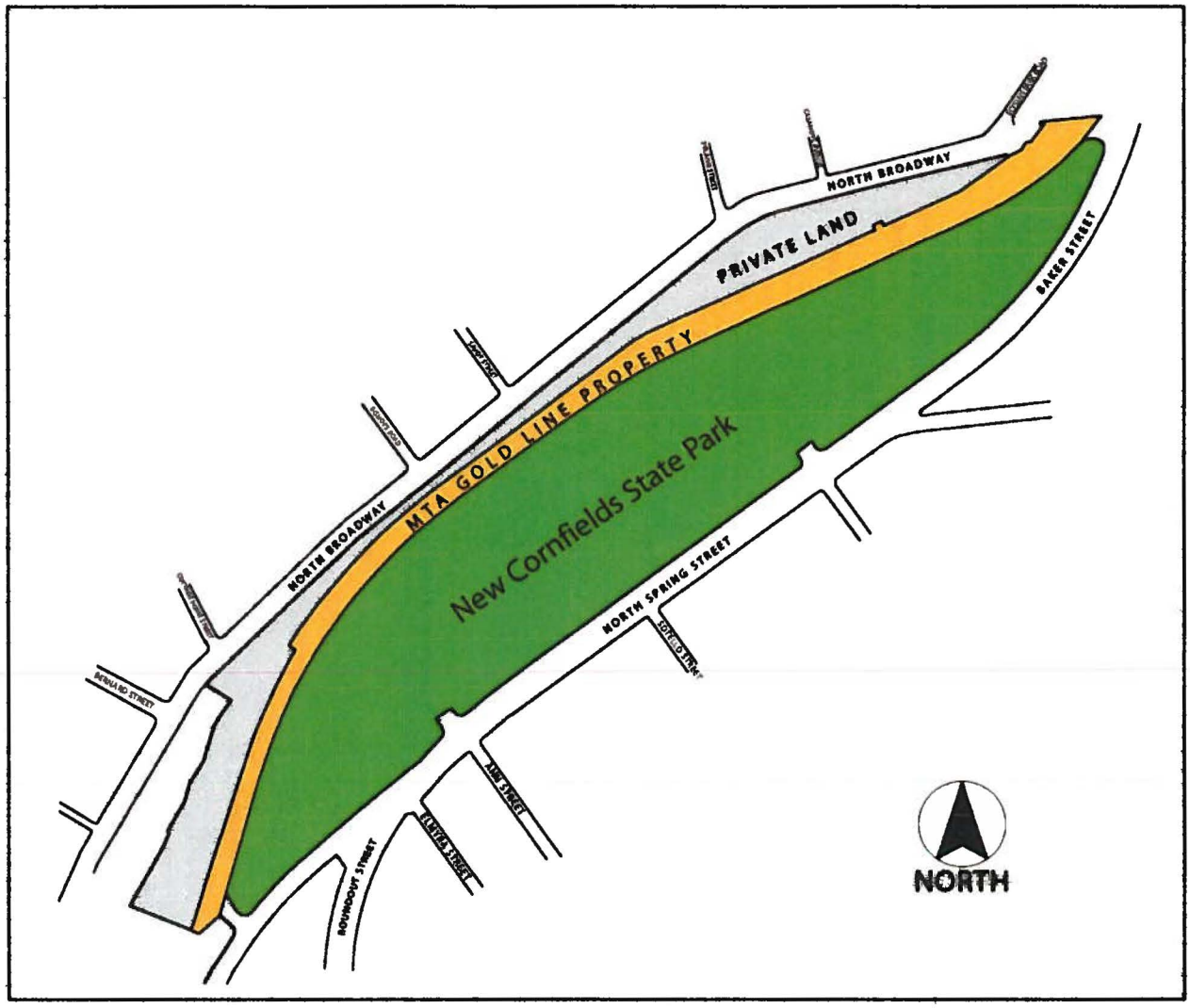

Figure 3. Project property and immediate neighbors

PROJECT PERSONNEL AND ACKNOWLEDGEMENTS

Cogstone Resource Management Inc conducted the project. Mari Pritchard Parker, RPA, served as the Principal Investigator, conducted the field survey for the project and wrote the reconnaissance results. Sherri Gust, RPA, performed the record search and wrote the research section of the report. Sherri Gust, Al Knight (B.A. Anthropology) and Michael Mirro (M. A. Anthropology) performed documentary research. Michael Mirro created the overlay maps.

We were greatly assisted by Craig Howell of the Public Utilities History Center and Melody Carver of the Los Angeles History Slugs. These two amateur historians have been pursuing information on the engineering and history of the zanja system for many years and have accumulated significant research including personal interviews with DWP employees and Southern Pacific Railroad personnel. They were responsible for bringing attention to the first remnant of brick conduit zanja revealed near the project area. We acknowledge their contributions and thank them for their assistance.

Zoric Sheyman and Manuel Gurrola of MTA were also extremely helpful. We thank our colleagues Melinda Horne of Applied Earthworks and John Romani of Compass Rose for their professional courtesy in providing copies of their reports (the reports had not yet been processed and made available by the South Central Coastal Information Center).

RESULTS

RECORD SEARCH

A search for archeological and historic records was completed at the South Central Costal Information Center located at California State University Fullerton. The project area and a one-mile radius were searched for resources.

There were four historical archaeological resources within the project area; these include 19-003100, 19-003101, 19-003102, and 19-003103. The first two probably associated with the Southern Pacific Railroad Company's River Station Pacific Depot and Hotel. Resource 19-003100 consisted of a scatter of white ceramic dishware fragments, a fragment of olive bottle glass, a clear glass fragment and a rim fragment of milk glass. Resource 19-003101 is a scatter of historic artifacts fragments, which included porcelain, earthenware, red brick, coal, clear glass and metal. The third is a brick structural remnant with a trash scatter. The final one is a section of brick conduit from the water conveyance feature called the Zanja, Resource 19-003103.

One prehistoric archaeological and 13 historical archaeological sites were recorded within a one-mile radius of the project area (Table 1). Project reports listed by the Information Center within

the one-mile radius numbered 26 (Table 2). Several were previous projects in River Station Yard, although mislabeled Cornfield Yard due to confusion over the rail yard names.

Table 1. Recorded archaeological and historical sites within one mile radius of the Project Area

Site	Location	Site Type
19-003100	Project area	Historic artifact scatter – prob. River Station Depot & Hotel
19-003101	Project area	Historic artifact scatter – prob. River Station Depot & Hotel
19-003102	Project area	Brick Wall/ Historic Artifact Scatter
19-003103	Project area	Brick conduit zanja section
19-186110	One-mile radius	Union Pacific Railroad/Hobart Tower
19-186112	One-mile radius	Southern Pacific Railroad
19-000007	One-mile radius	Historic scatter
19-000887	One-mile radius	Historic artifacts and structures
19-001575	One-mile radius	Historic artifacts and structures, Native American burials
19-002828	One-mile radius	Historic trash deposit
19-002924	One-mile radius	Historic scatter
19-002928	One-mile radius	Brick building and historic trash deposit
19-002959	One-mile radius	Historic Chinatown artifact scatter
19-100464	One-mile radius	Historic school
19-150329	One-mile radius	Los Angeles Chinatown Heritage & Visitors Center
19-150456	One-mile radius	Naval and Marine Corps Reserve Center
19-186859	One-mile radius	Arroyo Seco Flood Control Channel

Table 2. Archaeological and historical projects completed within one mile of the project area

Author	Ref	Title	Date
Allen, Rebecca	LA3788	Historic Resources Eligibility Survey and Archaeological Resources Inventory Survey of the Naval and Marine Corps Reserve Center.	1997
Anonymous	LA2950	Consolidated Report: Cultural Resource Studies for the Proposed Pacific Pipeline Project	1992
Anonymous	LA4389	Metro Pasadena Project Preliminary Engineering Structural Feasibility for the Los Angeles River Crossing.	1992
Ashkar, Shahira	LA4834	Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Anaheim and Orange County.	1999
Bissell, Ronald M.	LA5425	Emergency Recovery Actions at CA-LAN-2828, Los Angeles County, California.	2001
Budinger, Fred E., Jr.	LA6840	Phase I Archaeological Survey Former Aliso Street MGP Site Los Angeles, California.	2003
Costello, Julia G., Wilcoxon, Larry R.	LA3906	An Archaeological Assessment of Cultural Resources in Urban Los Angeles, California La Placita de Dolores—LAN-887.	n.d.
Dewitt, John	LA6360	City of Los Angeles/Cornfields Site EDA Grant Application.	2000

Dillon, Brian D.	LA3151	Alameda District Plan, Los Angeles California: Prehistoric and Early Historic Archaeological Research	1994
Duke, Curt	LA6377	Cultural Resource Assessment Cingular Wireless Facility No. SM 141-05 Los Angeles County, California.	2002
Foster, John	LA3377	No title listed. CA-LAN-1103	1996
Foster, John M.	LA6336	Archaeological Inventory for Soil Remediation Cornfield Rail Yard Project, City of Los Angeles, California.	2002
Frierman, Jay	LA4383	Cultural Resources Study, Chinatown Senior Citizens Housing Site.	1980
Frierman, Jay D.	LA3910	Monitoring the Restoration and Rehabilitation of the Sepulveda Block 622-624 North Main Street El Pueblo de Los Angeles State Historic Park.	1983
Greenwood, Roberta S.	LA3103	Cultural Resources Impact Mitigation Program Angeles Metro Red Line Segment 1	1993
Hale, Alice	LA6358	Archaeological Monitor Report Chinatown Branch Library 639 North Hill Street Los Angeles, California.	2002
Hatheway, Roger G.	LA4452	Determination of Eligibility Report Chinatown.	1982
Lapin, Philippe	LA5416	Cultural Resource Assessment for Pacific Bell Wireless Facility SM 017-05, County of Los Angeles, CA.	2000
Lee, Portia	LA4218	Seismic Retrofit North Broadway Bridge over the Los Angeles River.	n.d.
Maki, Mary K.	LA3693	Phase I Archaeological Survey of 2 Acres at 1605 Eastlake Avenue Central Juvenile Hall Los Angeles, California.	1997
Messick, P., R. Greenwood, A. Hale	LA6335	Archaeological Monitor Report Historic Cornfield Railroad Yard.	2003
Meyer, Dorothy L.	LA4043	Seismic Strengthening of Existing Bridges- Group J: North Main Street Building Over the Los Angeles River.	1990
Moffat & Nichol	LA4390	Arroyo Seco Bridge Reconstruction Preliminary Design and Seismic Retrofit.	1993
Romani, Gwendolyn	LA4042	Results of Phase I Archaeological Survey Located at 219-223 South Avenue 18, Los Angeles, California.	1998
Unknown	LA4044	Environmental Impact Report: Seismic Retrofit of Olympic Boulevard and North Broadway Bridges Over the Angeles River.	1995
Whitley, David S.	LA3645	Phase I Archaeological Survey and Cultural Resources Assessment of the Metropolitan Water District Headquarters Study Area, Los Angeles, California.	1995

RESEARCH

Zanja History

The Zanja Madre was constructed by community labor within a month of the founding of El Pueblo de Nuestra Señora La Reina de Los Angeles in 1781 (Gumprecht 1999:44). This mother ditch originated near the present N. Broadway bridge and ran across the base of a bluff to the original Plaza, then curved north toward the hills (Layne 1952; Figure 4). A brush and earth dam (toma) was used to divert river water into the ditch.

In the early 1850s, the City installed a water wheel at the toma to increase the water supply to the Zanja Madre (Layne 1952:21). About the same time, Eagle Mills (later Roller Mills and Capitol Milling) was the first company to use the Zanja Madre to power a commercial enterprise (Layne 1952:20) and W. G. Dryden acquired the right to build a domestic use reservoir, with water from the Abila (later Dryden) Springs, in the Plaza supplied by pumps operated by a wheel he built in the Zanja Madre near the present junction of Main and Alameda (Anon. 1897:7-8; see photo of wheel Gumprecht 1999:64). The increased water flow permitted a second zanja to be built in 1857 (later referred to as Zanja 8), branching off the Zanja Madre (Spriggs 1931:16).

Flooding events washed away the toma and wheel more than once and eventually the dam was moved north to the area of modern Riverside Bridge where the river is naturally higher in elevation (Guinn 1915:391-2; Figure 5). The new dam was constructed of wooden planks and a wheel was used to raise the water to a newly constructed reservoir (Buena Vista Reservoir) and to supply the Zanja Madre (Layne 1952:21). Wooden flumes supplied domestic water but were prone to leak and fail (Gumprecht 1999:66).

Layne, citing a long-time local resident, (1952:21) states that the zanja Madre was an open ditch along the base of a bluff until 1877 when a tunnel over 3000 feet long was cut into the sandstone of the bluff. He further states that within a few months the tunnel had caved in and attempts were made to repair it by partially relining it with brick. The tunnel continued to fail and it was abandoned and the original open zanja was used again. However, he also states that the Zanja Madre made an 18-foot drop in a 3-foot wide brick conduit to supply water to Eagle Mills (1952:20).

By the 1880s irrigation ditches radiated in every direction from the river and the City was investing heavily in improvements to the zanja system (Gumprecht 1999:71). Zanjas in downtown and business areas were replaced by closed conduit and iron pipe (Gumprecht 1999:71, Springs 1932:17). By the early 1890s, there were over 50 miles of zanja – about half consisting of flumes, pipe and culvert (Brook 1983:28). By 1906 the zanja system was mostly abandoned or in use only as part of the storm drain system (Costello and Wilcoxin 1977:75-87).

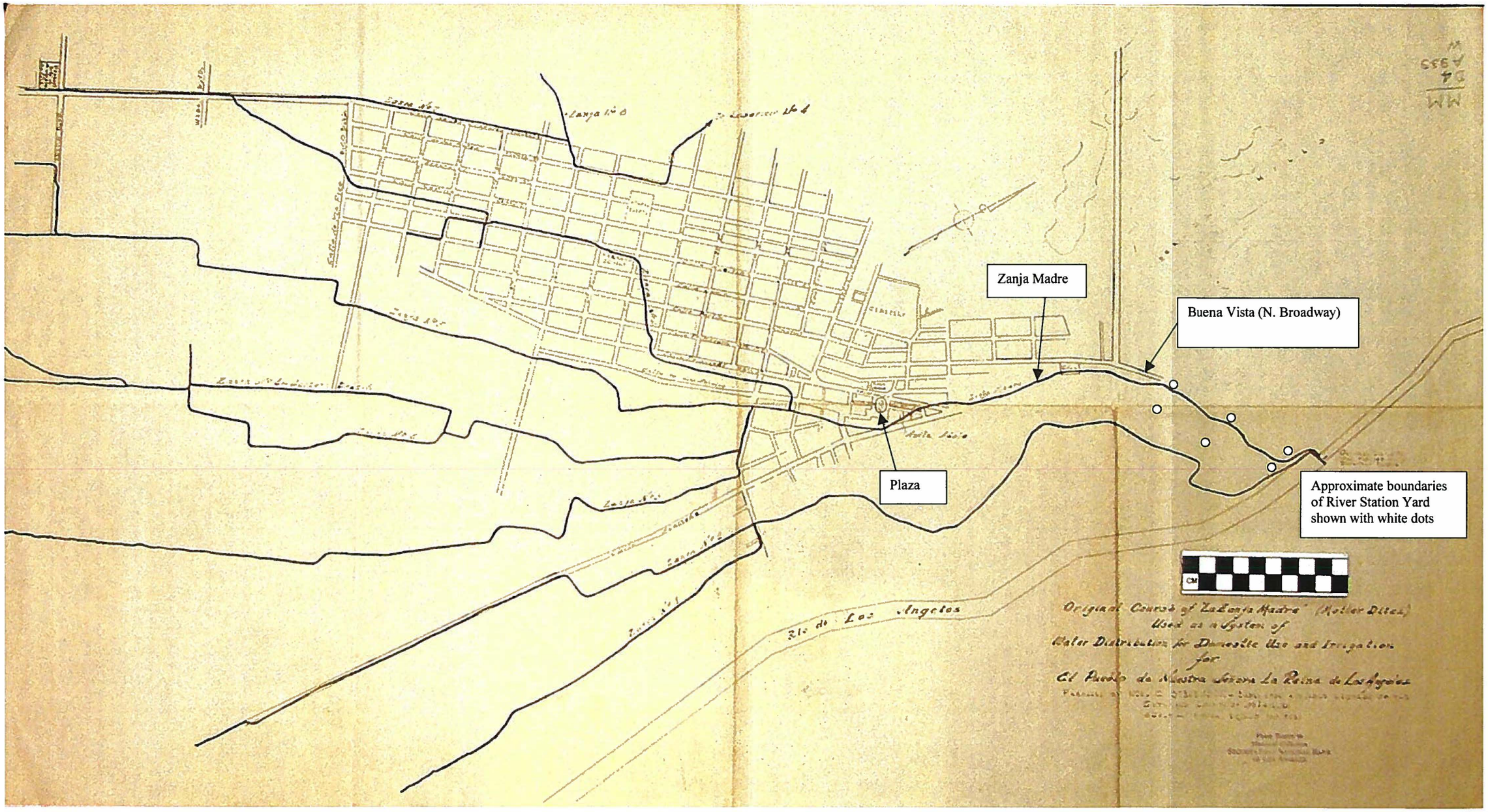

Figure 4. Original Course of "La Zanja Madre" (Stevenson, N.C. n.d.)

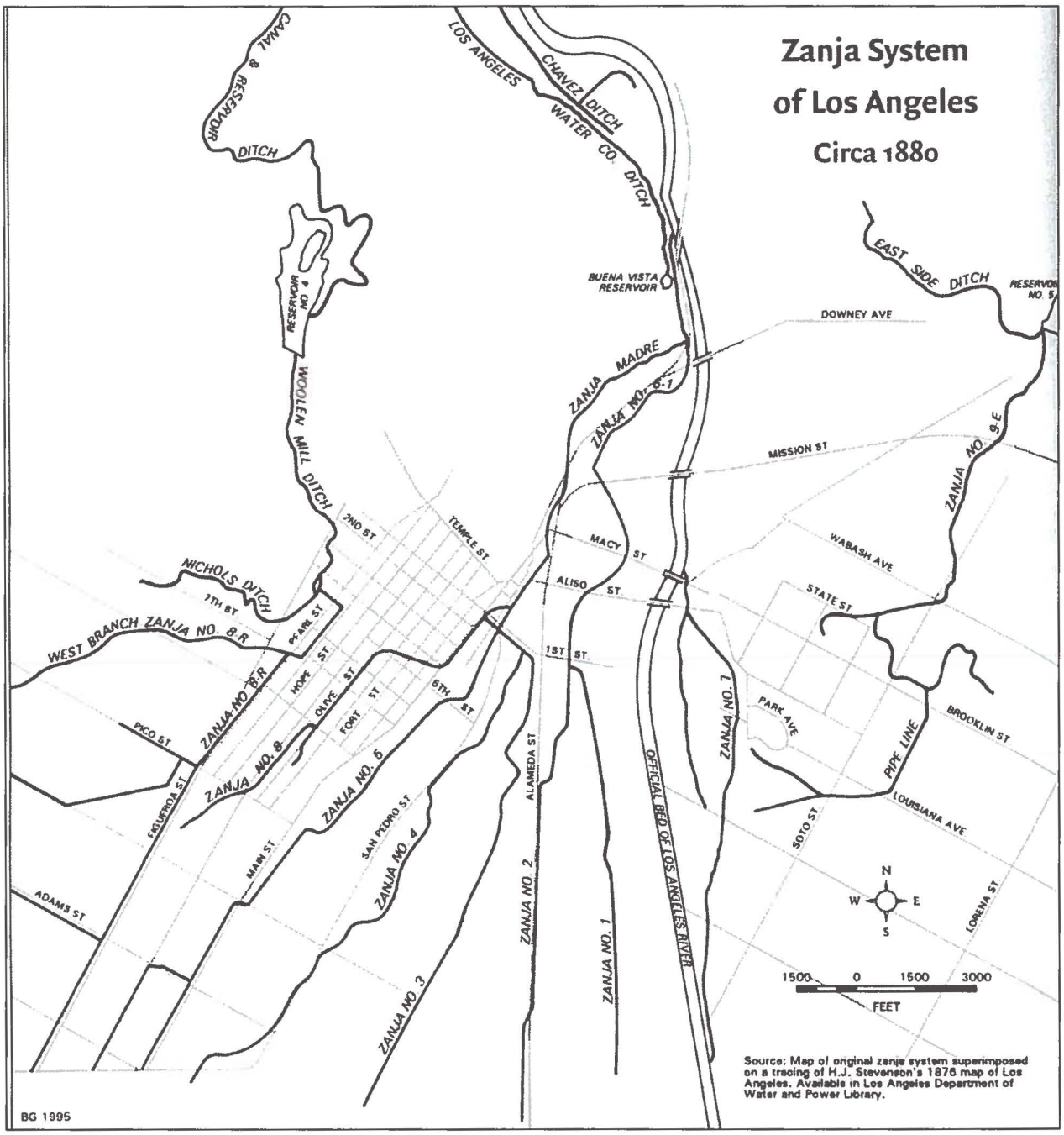

Figure 5. Zanja System of Los Angeles circa 1880 (Gumprecht 1999:72)

Illustrated History of River Station Yard

Lessor known history of the Zanja Madre may be revealed by use of historic maps. The earliest map with landscape features on it is from 1871 (Figure 6). This is well after Los Angeles became an American town and the map marks the location of Sonoratown, the site of the Chinese massacre and, west of downtown only, the open zanja. While the River Station area is off the map to the right, the steep slope of the bluff along which the Zanja Madre flowed to the Plaza is clearly visible. However, no open zanja is illustrated in that location.

The first map of the River Station area located is from 1876 (Figure 7). Once again, the steep slope of the bluff is illustrated, but no open zanja is visible. River Station Depot is clearly present and the railroad active. The Eagle Mills (later Roller Mills and Capitol Milling) building is not illustrated at the right-hand end of the rail yard although it was supposed to be present by 1851.

The next map located was of River Station yard in 1891 (Figure 8). The rail yard is fully developed with many buildings and the Mill is present. Once again the steep slope of the bluff is illustrated and no open zanja is present.

A slightly later map looking north instead of south, illustrates the bluff even better (Figure 9). This 1894 map shows the eastern end of the yard, the river and the bridges well. Again, no open zanja is visible anywhere in the illustration.

The same vista is presented in a 1909 map (Figure 10). Again the steep slope of the bluff is well illustrated as is the relative lack of development on that slope. Note that the roundhouse present in 1894 has been removed, along with the other maintenance buildings. Horne (2003:23) states that a larger, more modern roundhouse at MidwayYard replaced the River Station roundhouse in 1902. Southern Pacific apparently removed the old buildings promptly.

A 1924 aerial photo presents an amazingly similar status for River Station Yard (Figure 11). A 1987 photo (Figure 12) shows more tracks but retains the steep, undeveloped bluff.

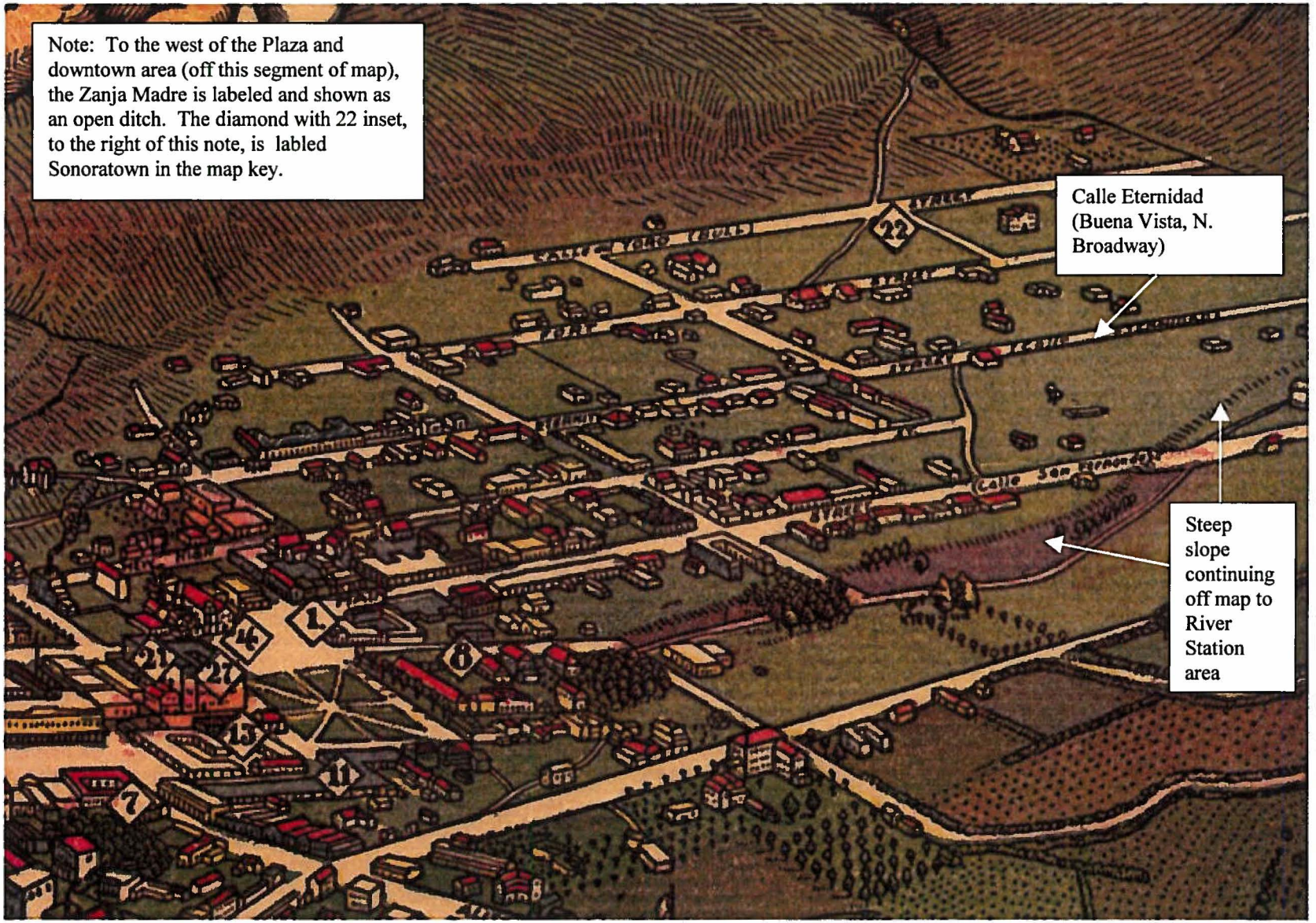

Figure 6. 1871 map of Los Angeles (Gores 1871)

LA-08512

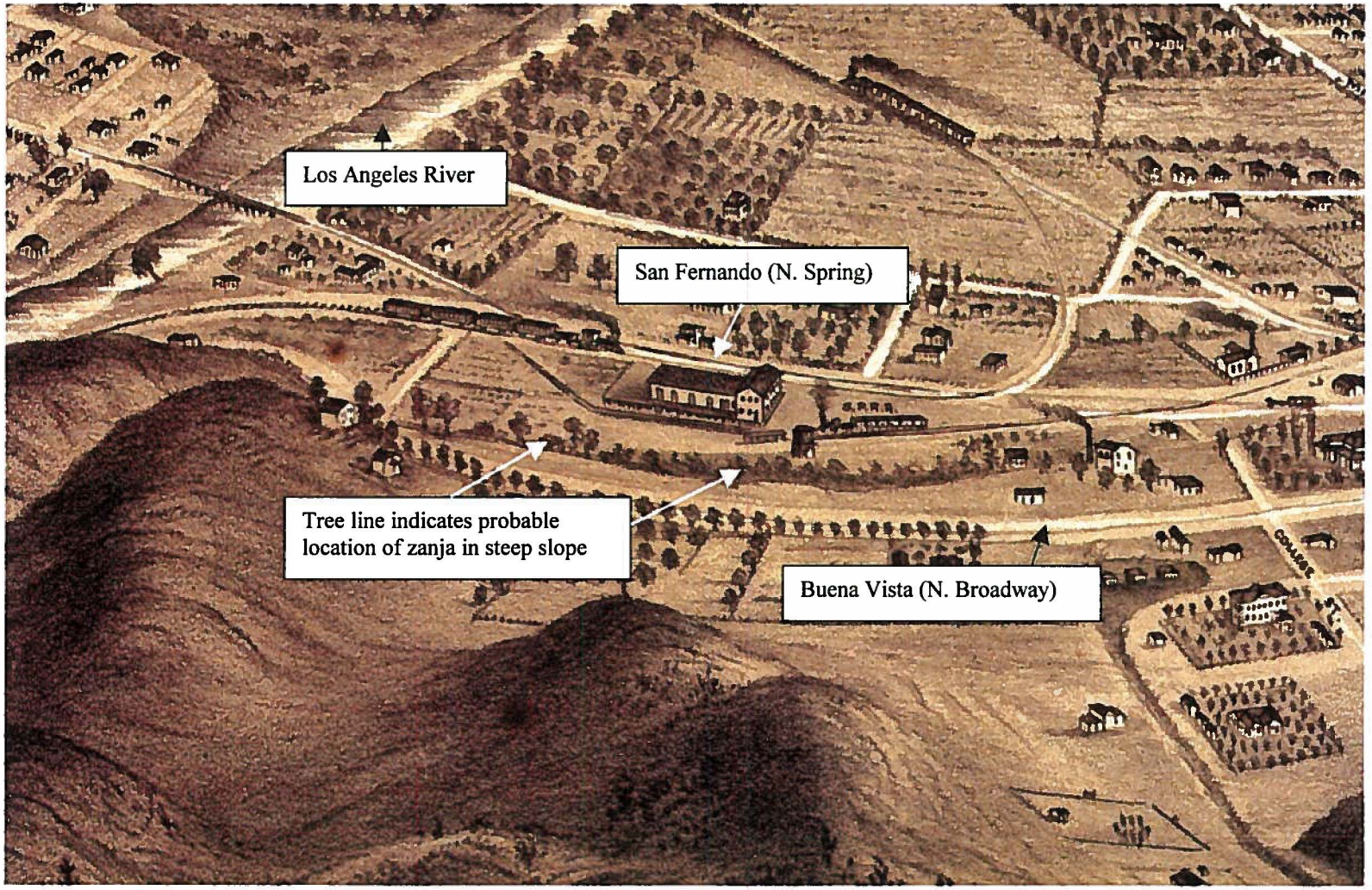

Figure 7. 1876 map of River Station Yard looking south from the Elysian Hills (Glover 1877)

LA-08512

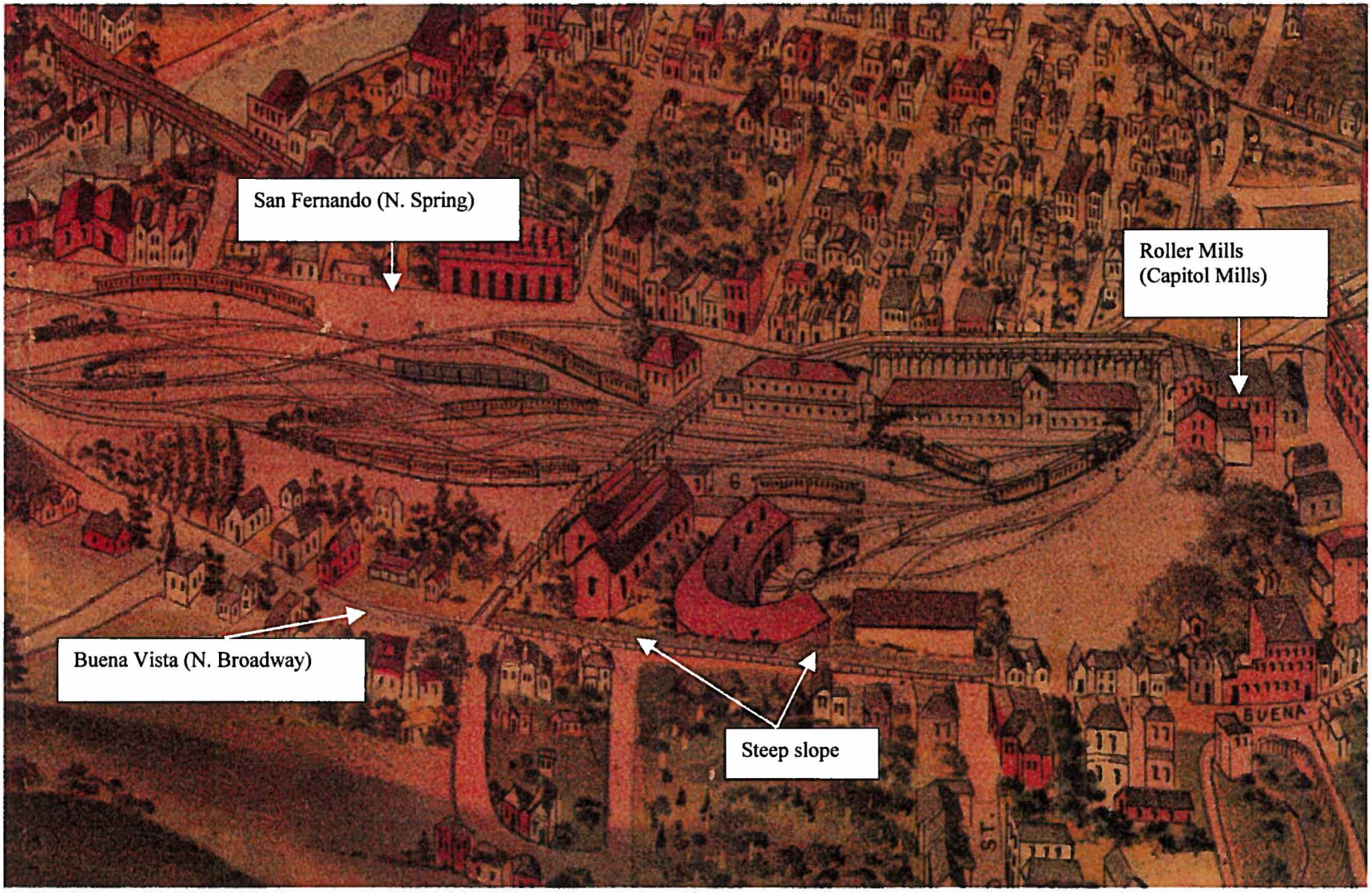

Figure 8. 1891 map of River Station Yard looking south from the Elysian Hills (Elliott 1891)

LA-08512

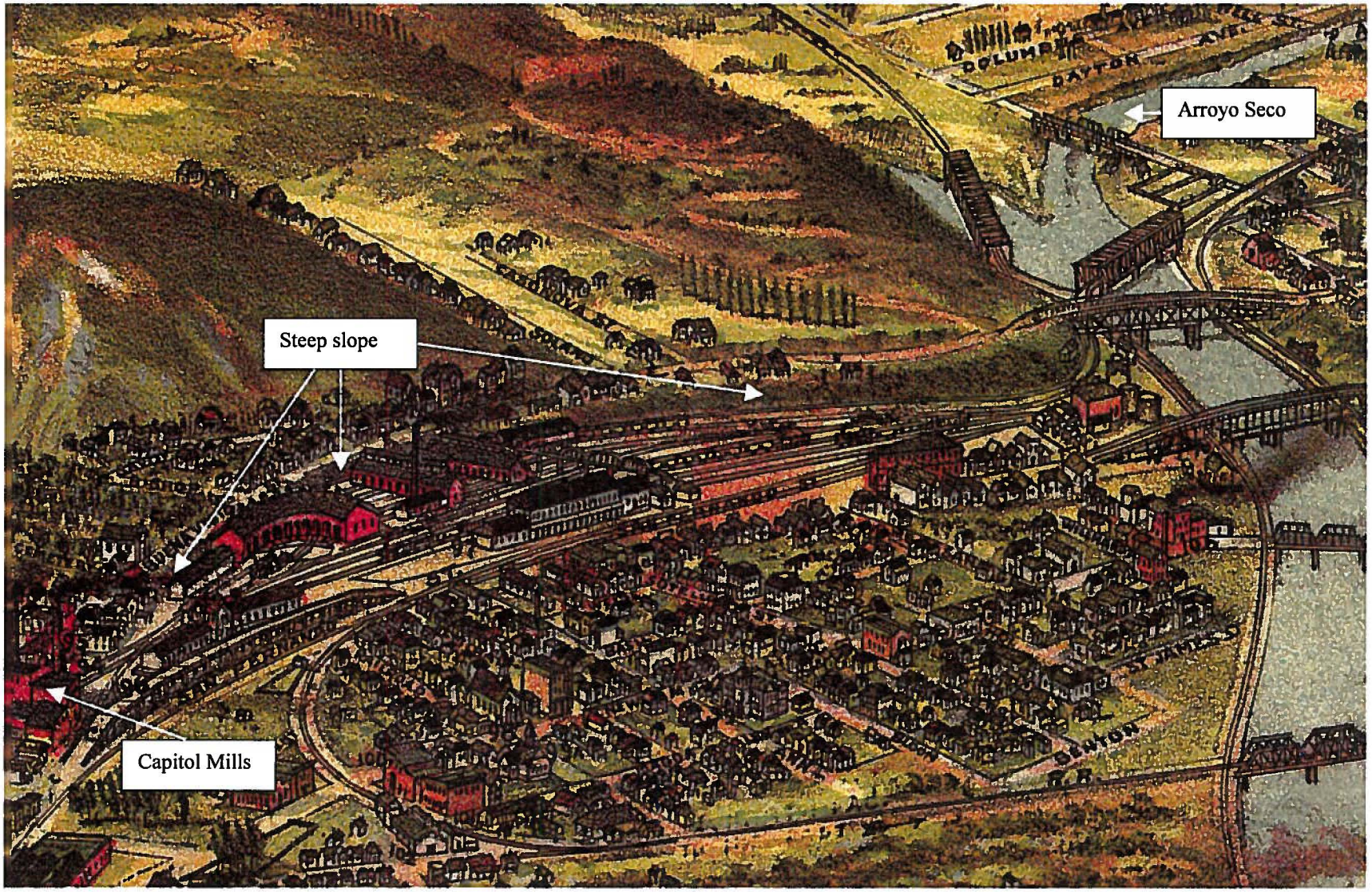

Figure 9. 1894 map of River Station Yard looking northeast (Pierce 1894)

LA-08512

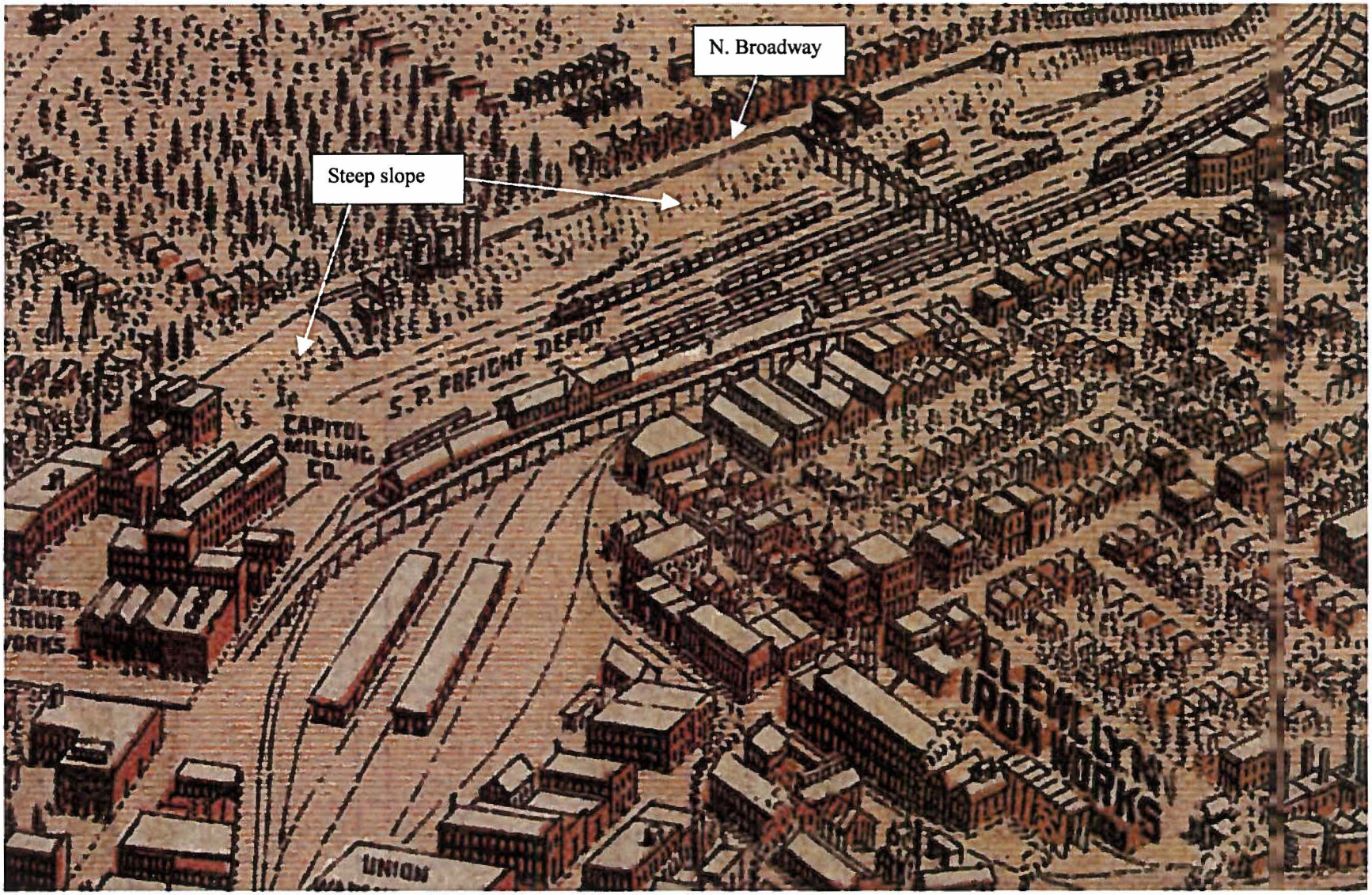

Figure 10. 1909 map of River Station Yard looking north (Gates 1909)

LA-08512

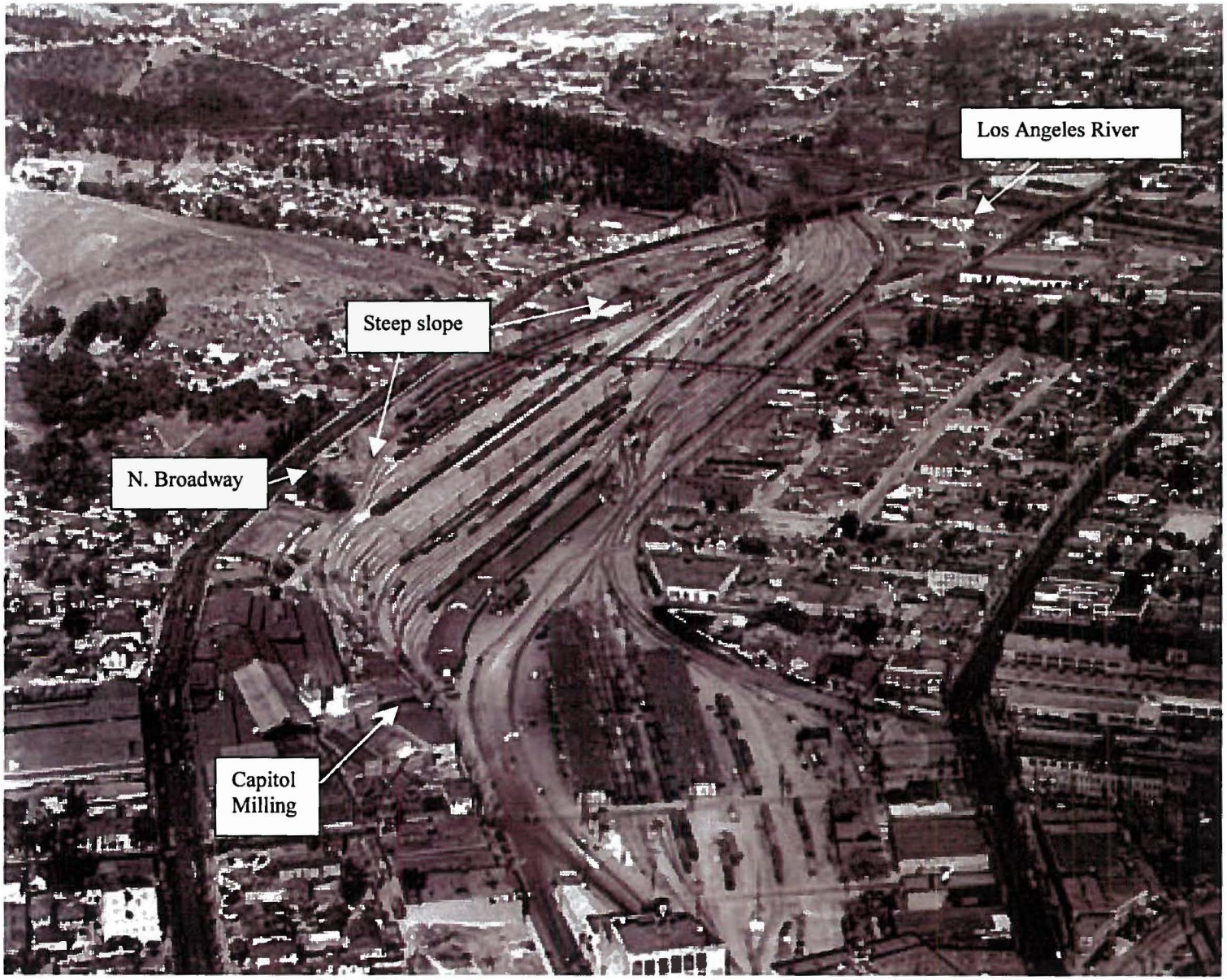

Figure 11. 1924 Aerial of River Station Yard looking northeast (LAPLPD 1924)

LA-08512



Figure 12. 1987 photo of River Station Yard looking southwest to downtown (LAPLPD 1987)

LA-08512

Previous Archaeological Investigations

Archaeological monitoring of pipeline construction in River Station Yard was conducted by Science Applications International Corporation (Berryman and Woodman 2001). They list only "slaughterhouse debris" as being present in one location in the Yard (Berryman and Woodman 2001:27). No bone was collected and no other notes were made. Since no slaughterhouse is known from any time period, it seems unlikely that this deposit was characterized correctly.

Archaeological testing of the theoretical location of the Zanja Madre at the base of the bluff was conducted in 2000 by Applied Earthworks for the Area of Direct Impact (ADI) for the Metro Blue Line (now called the Gold Line; Horne 2003). This testing consisted of nine test trenches (Figure 13), ranging from 10-30 feet in length and 5-6 feet in depth. Sediments encountered in the testing consisted mostly of disturbed fill sediments or disturbed fill sediments overlying native fluvial sands and gravels. Remnant building materials –brick, steel pipe, sewer pipe, cement slabs, - were encountered as were scattered historical archaeological materials such as glass and ceramic. Small, torch-cut segments of track were also present in the fill.

Testing of soil remediation zones was performed in 2002 by Greenwood and Associates in River Station Yard (Foster 2002). Cultural materials were encountered in 1 of 21 trenches (Figure 13). The one positive trench resampling the roundhouse foundations previously discovered by Applied Earthworks.

Archaeological monitoring of soil remediation test grids was performed in 2002-2003 by Greenwood and Associates in River Station Yard (Messick et al. 2003). Materials encountered, present in 8 of 18 grids (Figure 13), were extremely similar to those recovered by Applied Earthworks. A deep cultural deposit was encountered in one grid along N. Spring Street and consisted of historical archaeological materials probably associated with the Pacific Hotel that once operated in River Station Yard.

RECONNAISANCE

Prior to survey, a composite map was constructed from archival research and referenced during the survey (see Figure 13). The cultural resources reconnaissance survey was conducted on June 10, 2004. The survey was conducted on foot, surveying all ground between the MTV Gold Line on the north and Spring St on the south. The area between the Gold Line's north fence and Broadway is private property and was not accessible for pedestrian survey. The area was inspected visually and photographed.

The MTA property at River Station Yard is at present a large graded and compacted lot with no structures except fences and the Gold Line track (Figure 14). The natural surface has been heavily impacted by construction and removal of structures including buildings and rail features. An under ground utility corridor (Pacific Pipeline) was noted and appears to bisect the area.

The soils in the area are alluvial and colluvial river deposits consisting of small to large gravels and cobbles that have been disturbed and compacted by historic construction activity. The MTA Gold Line is set at the base of a steep slope south, and below grade of, Broadway. This is the described location of the original open Zanja Madre. However, extensive testing (Horne 2003) did not reveal any identifiable features related to the zanja in this location.

The steep slope of the bluff below Broadway (private property) has been impacted at the western end in some areas due to the construction of sections of retaining wall for a parking structure (in 2000) and paved lot (recently). A five-foot length of brick conduit approximately 3.5 feet in diameter was discovered in 2000 (Maese 2000) after construction of a parking structure (Figure 15). Note the new asphalt visible in the photo. This brick conduit was identified as the Zanja Madre dating to approximately 1885 (Wesson 2002, Horne 2003).

Since that time, a parking lot has been installed below the slope where the brick conduit was found in 2000. Two additional sections of brick conduit were visible during the field survey. Both are located by following the slight curve of the hillside southwest from the 2000 segment (Figure 16, 17).

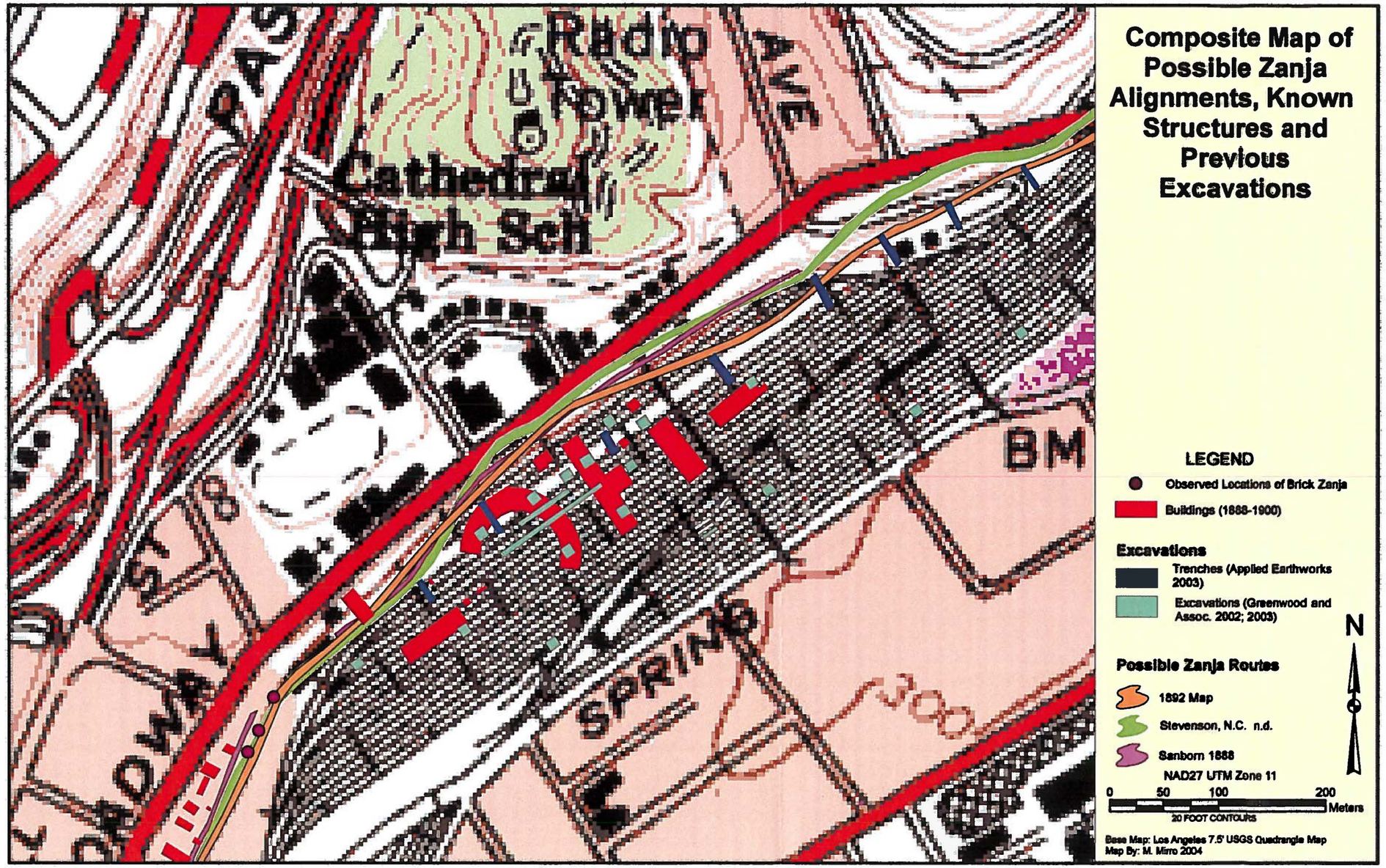

Figure 13. Composite Map of Possible Zanja Alignments, Known Structures and Previous Excavations



Figure 14. River Station Yard, looking west to downtown Los Angeles



Figure 15. Previously known brick conduit (19-003103) adjacent to project area



Figure 16. Exposed brick conduit near project area, east section



Figure 17. Exposed brick conduit near project area west section

These three known segments are all on private property north of the Gold Line. Their locations in the hillside below Broadway seem to indicate that the brick conduit may continue in the remainder of the undisturbed bluff just above grade (Figure 18).

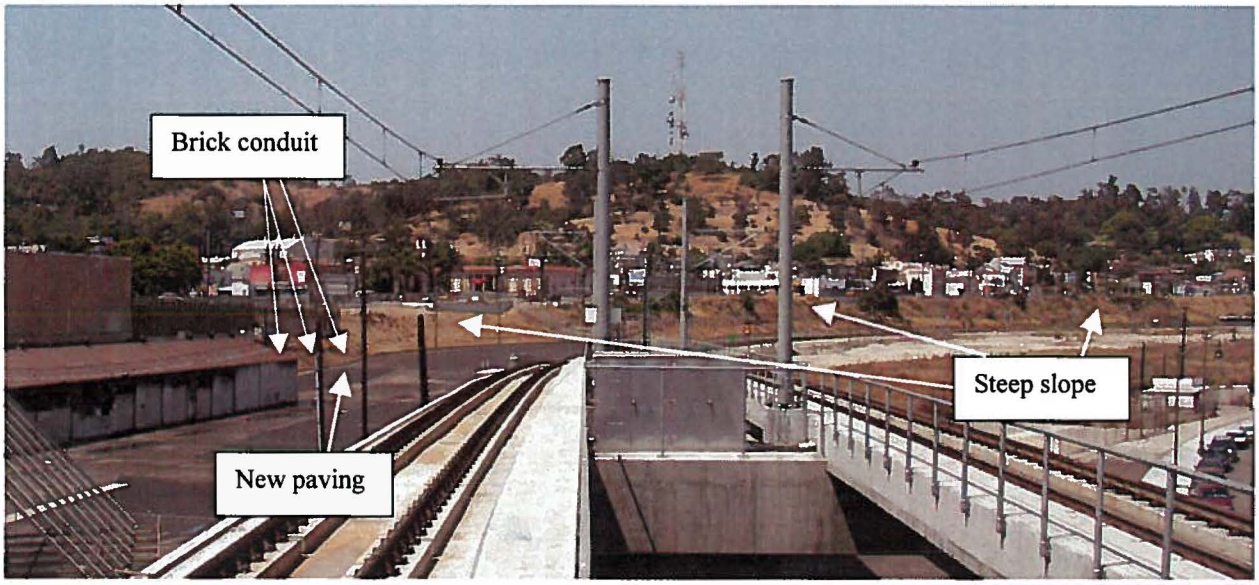

Figure 18. View north to Elysian Hills showing Gold Line platform, newly paved area and locations of exposed brick conduit.

CONCLUSIONS

The open Zanja Madre was described as running along the base of the bluff below North Broadway. Extensive trenching and soil work within River Station Yard, especially directly in the area at the base of the bluff, has not revealed any evidence of the original open zanja. The Gold Line property was appropriately tested in 2000 and there is no evidence that potential zanja remnants would be revealed by further excavation work along the Gold Line route. We do not recommend any further excavations on the Gold Line property. There is also no evidence that any portion of the Zanja Madre ever crossed the old River Station Yard property that is now Cornfield State Park.

Three sections of brick conduit paralleling the route of the Zanja Madre, but in the face of the bluff below Broadway and above grade of the original open zanja, are now known. These segments are on approach to the Capitol Milling building where historic sources report brick conduit zanja by the mid1850s and imply that it was present much earlier. The circumference of the known segments matches the historically reported dimensions. The location in the bluff also matches that implied by historic illustrations. Thus, they may truly be remnants of the Zanja Madre.

Alternatively, they may represent storm drains installed in the early 20th Century. Very similar brick conduit features were revealed during excavations along First Street and Temple Street (near Grand Avenue) where no zanja branches are known to have existed (Mirro and Gust 2004).

We recommend the following if and when the private property owner develops or alters that property: (1) testing of the mortar and bricks from the exposed brick conduit segment for dating purposes, (2) shovel or auger testing outward from the known segments along the bluff to determine the extent of feature, (3) shovel or auger testing in a grid toward Capitol Milling to determine if any fall is present as historically reported, (4) excavation into the bluff in at least one location to determine if any evidence of a tunnel in sandstone is present as historically reported, and (5) appropriate preservation.

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Los Angeles

ARCHAEOLOGICAL INVENTORY FOR SOIL REMEDIATION

Cornfield Rail Yard Project
City of Los Angeles, California

Prepared for:
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John M. Foster, RPA, Vice President

October 2, 2002

Abstract

At the request of The Trust for Public Land, Greenwood and Associates has conducted a limited archaeological inventory for the proposed soil remediation effort in the Cornfield Railroad yard in downtown Los Angeles. The effort consisted of excavation of shallow 30 foot long trenches in areas identified as containing contaminated soils. The purpose was to determine within the limitations of the excavation if cultural resources were present or absent. The trenching program identified one remediation area with structural remains and one with railroad ties. A remote sensing effort conducted on the parcel was ground-truthed and several buried structural elements of the Southern Pacific railyard were tentatively identified.

A recommendation for development of an archaeological treatment plan is proposed to facilitate implementation of the soil remediation effort. Central to this plan would be the presence of an archaeological monitoring program designed to identify, assess, and treat any archaeological resources discovered in the course of the project.

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Introduction

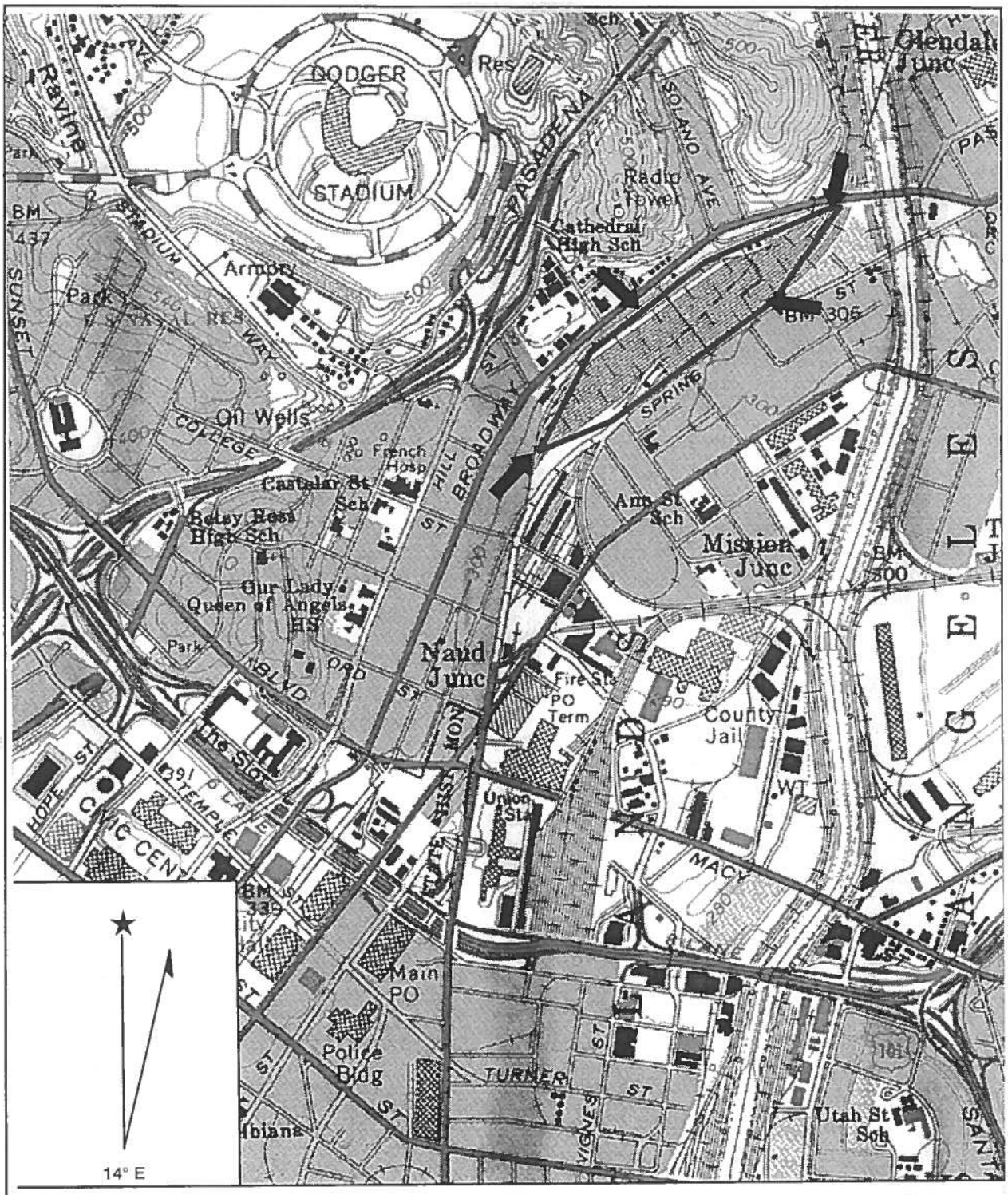
The former Cornfield railyard is a 32-acre parcel situated near the Los Angeles River and Chinatown in downtown Los Angeles (Figure 1). The railyard, located at 1245 North Spring Street, has been operational since 1875. The parcel was purchased by The Trust for Public Land (TTPL) and tranferred to California Department of State Parks and Recreation (DPR) and is to be converted into a State park. One of the responsibilities of TTPL is the removal of contaminated soils. The property has been transferred to DPR and construction is anticipated to begin in late 2002. Limited soil removal will be conducted as a remedial action before construction begins. The soils consultant, Shaw Environmental, identified various loci within the parcel where contaminated earth was present (Figure 2). In order to make informed decisions regarding the potential effects of the remediation effort on archaeological resources, Dr. Daniel Larson, California State University, Long Beach, conducted a limited remote sensing investigation to identify potential areas where buried deposits or features may be present.

Two previous studies had been undertaken within and adjacent to the Park parcel (Horne 2000; Romani, Romani, and Larson 2000). The latter study identified numerous historical structures and buildings within the project area, and the Horne investigation verified the presence of some of these resources in an adjacent strip of land. The two reports indicated that the sensitivity for cultural resources is high. The present study is prepared as a Technical Report in support of Park guidelines and permits.

Urban archaeology requires a broad-based approach, since the ground surface in developed areas is typically not visible. Prediction and estimates of sensitivity must often be based upon research into historical maps and documents that reveal structures, topography, and land uses which may no longer be apparent. Once the historical landscape is defined, the second step is a review of the development, grading, or construction which may have obliterated evidence of past occupation and endeavors, and identification of those areas where a potential for recovery of archaeological resources still exists. It was decided, in consultation with DPR, that a trenching program would be conducted to determine if buried cultural resources are present within the remedial soil areas. If any were encountered, a treatment plan would be developed in consultation with TTPL and DPR. For this investigation Greenwood and Associates obtained a State Parks Archaeological Permit and an Archaeological Accession number (P1303).

Project Setting

The street address is 1245 North Spring Street. The proposed project location is within property owned by DPR, bounded by North Spring Street on the southeast, the Los Angeles River on the east, and N. Broadway on the north and west. The parcel is oriented to the northeast-southwest with a broad mid-section and narrow ends. True North is approximately 45 degrees to the overall orientation of the parcel axis. To simplify



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Caption: Arrows Depict Project Area

Figure 1. Vicinity Map.

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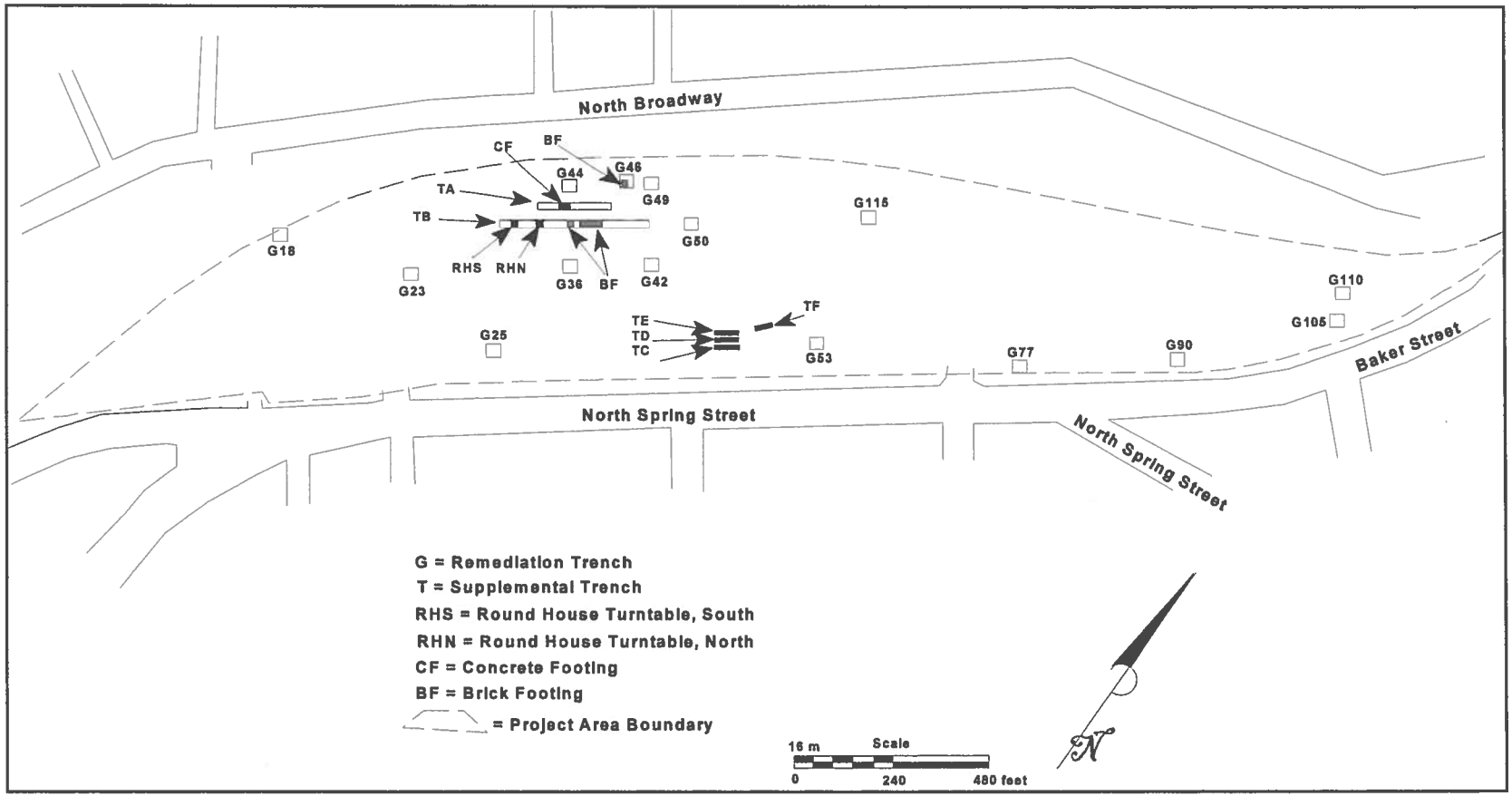

Figure 2. Area of Investigation

discussions regarding cardinal directions, it was decided to call the long axis of the parcel north-south. Alameda Street is a north-south street and then turns into North Spring Street, north of Cesar Chavez. Because of the general northerly alignment, the designation was adopted to facilitate discussion. The project is mapped in an unsectioned portion of Township 7S, Range 8W, as depicted on the USGS 7.5' Los Angeles Quadrangle (1966, revised 1994).

The site is located on the flood plain of the Los Angeles River, on gently east-sloping land. Soils in this area consist of silt and silty sand underlain by sand and gravel with deeper layers of silt and silty sand. Varying amounts of gravel and cobbles are intermixed with the soils. Native plant communities are no longer extant and vegetation is limited to weedy species.

Background Information

It is not the intent of this study to reiterate all of the previous research that has been conducted within and adjacent to the project parcel but to summarize the salient points.

The *Zanja Madre*, earliest water conveyance system in Los Angeles, was located along the north and western edge of the current parcel. Originally constructed as an open earthen ditch in 1781, it was enclosed in wooden flumes in 1877, and in 1885 in a brick conduit. The system was ultimately abandoned after completion of the Owens Valley project in 1913, but segments continued in use as storm drains at least as late as 1933 (Greenwood 2002:2).

An historical archival study confirmed the presence of a portion of the *Zanja Madre*, as well as buildings, structures, and features associated with the first Southern Pacific Railroad depot, known as River Station, along with a roundhouse, shops, and associated hotel within the boundaries of the property (Romani et al. 2000:i). The railroad period was discussed as follows:

> The site was at one time occupied by River Station, a Southern Pacific Railroad (SPRR) passenger depot, and later an SPRR switching yard. River Station, constructed in 1875 and operational the following year, was the first SPRR passenger in the City of Los Angeles. In 1890, a new passenger depot replaced the original depot at a different location, to the southeast of the project site, at the foot of Main Street. By 1893, freight sheds were added at the original River Station Depot and the station was renamed the Southern Pacific Freight Depot. None of the original structures remains; however, some portions of the abandoned tracks remain, along with some paving [Romani et al. 2000:8].

In 1971, the City of Los Angeles Cultural Heritage Commission designated the project site as City Historical Cultural Monument #82, River Station Area/Southern Pacific Railroad in order to commemorate the contribution of the railroad to the history of Los Angeles. Various researchers have provided opinions that the Southern Pacific Railroad is potentially eligible to the National Register of Historic Places (Foster and Snyder 2002:10; Ashkar et al. 1999).

In 2000, an archaeological test excavation was conducted for the Los Angeles to Pasadena Metro Blue Line Project (LAPBL). Now called the "Gold Line," this light rail corridor runs along the toe of slope along the north, northeast, west, and southwest sides of the DPR property. The investigation utilized Sanborn Fire Insurance Maps and other records to establish the potential location of archaeological features. Based on this information, a mechanical trenching program was implemented. This effort resulted in the discovery of historical artifacts, sewer pipe, brick foundation and stem wall, cement footings or foundations, and a cold-pressed, riveted, corrugated steel pipe (Horne 2000:33). An analysis of the archival data and field observations suggested that the brick foundation and stem wall was a part of the foundation for the River Station roundhouse that was in operation from 1876 to 1902. In addition, a segment of the *Zanja Madre* was identified in an area outside of the LAPBL construction zone, but in the immediate vicinity of construction activities (Horne 2000:36).

Methods

The scope of work prepared by TTPL called for the excavation of ten shallow test pits in areas identified as soil remediation zones by Shaw Environmental as containing contaminated soil. Preliminary evaluations of the remediation areas indicated that most of the contamination was within two feet of the current surface and not more than five feet in selected areas. The affected soils are to be removed to an appropriate facility. The actual number of test pits to be excavated would be refined as soils analysis continued. To assess the effects of the removal on archaeological deposits, TTPL retained Greenwood and Associates to excavate a shallow test pit 30 feet long, two feet wide, and between two and five feet in depth in each remediation zone. The geotechnical consultant provided a detailed map of the project area with each remediation area shown as a rectangle. These locations were surveyed and staked with a unique designation under the direction of Shaw Environmental.

The Project Archaeologist located test trenches at each staked location. In most cases the mid-point of the trench straddled the survey stake, but in some cases the trench began at the stake to avoid utilities, fences, or other obstacles. In most cases the trenches were oriented parallel to the long axis of the parcel, but were changed in some cases to avoid utilities or surface obstructions.

In the event that isolated artifacts of potentially significant age were found, the Project Archaeologist was to observe them and record the location and context. If a potentially important feature or deposit was encountered, it was to be noted, mapped, photographed, and backfilled. Because of time constraints, detailed exposure of any discovered features or deposits was not possible.

It was anticipated that it would take three days to excavate the trenches with backfilling at the end of each day for safety considerations. The work was conducted between September 17 and 19, 2002, under the supervision of John M. Foster, RPA, assisted by Linda Rehberger and Andrew Kinkella, archaeological technicians.

DPR had previously conducted a remote sensing program to assist in the location of buried structures and features (Larson 2002). Unfortunately, the report was not available until the end of the first day of field work and its immediate utility could not be fully realized. The effort consisted of two parallel linear transects along the long axis of the parcel. Both were oriented north-south, with the westernmost in vicinity of the roundhouse, facility and the second was intended to overlay the hotel complex on the east side of the parcel. While the westernmost pass was successful in covering the area of the roundhouse the second pass to the east missed the hotel and associated buildings. A third transect is currently being proposed to DPR to cover this area. Various remote sensing programs were conducted which identified numerous anomalies which were tentatively identified as "possible historic features as well as modern features" (Larson 2002:12).

After excavation of the trenches in the remediation areas, six additional trenches were excavated to ground-truth other anomalies discovered in the remote sensing effort. A large circular anomaly was identified as the center of the roundhouse and these secondary efforts focused on excavation in this area.

Results

The geotechnical consultant identified 21 locations that might need soil remediation. Five of these locations were either in the LAPBL construction easement or were too close to buried utilities to permit excavation. Table 1 provides a summary of each remediation area, dimensions, disturbance, and types of artifacts or features observed.

Table 1. Summary of Trenching Results

Trench No.	Dimensions (Length x width x depth in ft)	Compass Bearing (degree)	Observed Cultural Materials	Disturbance
G-18	30 x 2 x 2	220	None observed	Very little
G-23	30 x 2 x 3	51	Rail clamp	Artifact found at base of trench

Table 1. Summary of Trenching Results				
Trench No.	Dimensions (Length x width x depth in ft)	Compass Bearing (degree)	Observed Cultural Materials	Disturbance
G-25	30 x 2 x 2	56	None observed	None
G-36	30 x 2 x 5	51	Brick fragments and one flow blue ceramic fragment of improved earthenware, molded with gilt	Entire trench is jumbled and appears disturbed
G-42	30 x 2 x 3	51	Iron gear and brick fragments	Entire trench is jumbled and appears disturbed
G-44	30 x 2 x 3	42	Brick footing and sewer pipe	Very little
G-46	30 x 2 x 3	54	Loose railroad ties and concrete rubble	Some of the soil appears to be fill
G-49	30 x 2 x 3	54	Mortared brick rubble	Some of the soil appears to be fill
G-50	30 x 2 x 2	54	Railroad clamp	None
G-53	30 x 2 x 2	54	Railroad ties in alignment on west side of trench	None
G-77	30 x 2 x 2	320	Brick fragments and sewer pipe fragments	Brick fragments scattered throughout soil. Appears to be fill
G-90	30 x 2 x 2	24	None observed	Soil is stratified by fill episodes
G-105	30 x 2 x 2	42	None observed	None
G-110	30 x 2 x 2	48	None observed	None
G-115	30 x 2 x 3	54	None observed	Possible, soil is mottled
A	40 x 2 x 5	52	One concrete pad with rebar	Not obvious
B	300 x 2 x 4	52	Two sections of wood beams (within turntable), one massive brick footing, and one smaller brick footing. Chunks of broken concrete with steel plates.	Soil within the possible turnable was extremely mixed. Soil between the turntable and the massive footing was homogeneous. Large chunks of concrete with bolted steel plates were found at the northern end of the massive brick footing. These appear to be buried.
C	40 x 2 x 3	52	None observed	None observed

Table 1. Summary of Trenching Results				
Trench No.	Dimensions (Length x width x depth in ft)	Compass Bearing (degree)	Observed Cultural Materials	Disturbance
D	10 x 2 x 3	52	Intact alignment of railroad ties	None observed
E	80 x 2 x 3	52	Two artifacts observed, one bottle base and one chamber pot rim	None observed
F	10 x 2 x 3	58	None observed	None observed

All of the trenches had a 1 to 2 foot cap of gravel and hardened soil. The majority of trenches had definitive stratigraphy usually consisting of the fill cap followed by a homogeneous layer of soil, sometimes with brick fragments and in some cases without any cultural materials. The four trenches (G-77, 90, 105, and 110) excavated in the northern end of the parcel tended to have fewer brick fragments than the other trenches.

Structural remains in the form of a brick footing, were found in the west center of the parcel, and brick fragments were found throughout the rest of the trenches. While small pieces of brick and concrete were observed, they were isolated and unassociated. The trenches were photographed, mapped, backfilled, and the surface restored.

Six additional trenches were excavated to ground-truth the remote sensing effort. To differentiate these trenches from the remediation trenches, a sequential letter designation was used (A-F). Trench A was excavated to the west of the center of the round house and encountered a concrete pad with rebar in the middle. The pad was at the surface. Trench B was started south of the roundhouse turntable and encountered two discreet areas of horizontally laid creosoted wooden beams with large vertical metal bars extending upward from the middle of the beams. The two locations were two feet deep and in the approximate position of the roundhouse turntable west of center. The trench was extended northward and encountered a brick footing at the approximate point of the south side of the roundhouse sheds. Approximately 15 feet north, a 42 foot long section of mortared brick was encountered which terminated at the same distance that the north end of the roundhouse shed would be.

Trench C was located near the east center of the parcel in an area predicted to be the location of the hotel complex. No architectural elements or other cultural features was found. Trench D was excavated west of Trench C by 30 feet and encountered in situ railroad ties oriented north to south. This effort was abandoned and another trench (E) was excavated 30 feet west of Trench C. No structural features were observed. Trench F was located north of Trenches C, D, and E in an attempt to locate the water closet noted

on the Sanborn Fire Insurance Map, dated 1888. One bottle fragment and one fragment of a chamberpot were recovered from Trench E. The bottle fragment is a pale aqua, part of base and body wall, with partial embossing "DYOTT." It could have been any of the several medicinal preparations made by T. W. Dyott of Philadelphia after 1806 (Wilson and Wilson 1971:113). No structural features were observed. Ground truthing of the remote sensing effort has tentatively confirmed that some of the anomalies coincide with structural elements of the Southern Pacific roundhouse and turntable and other potential buildings. There was insufficient time to define the features and make a positive identification. The lack of corresponding mapping also hindered the effort, making it difficult to move from the map of current conditions to the historical maps. These issues will be resolved in future efforts and a more careful correspondence can be made between the historical maps and the remote sensing investigation.

Conclusions

To determine if cultural resources were present, a trenching program was developed to examine the subsurface of the project area. A total of 15 trenches was excavated from two to five feet in depth in the remediation zones. Only one remediation trench, G-44, encountered an intact structural resource which is believed to be a stem wall of the roundhouse shed. Trenching of G-53 resulted in the discovery of a track alignment with railroad ties still extant. Excavation of the other trenches did not result in the discovery of materials or features. The ground-truthing effort resulted in the tentative verification of five structural elements which appear to correspond with elements of the roundhouse and turntable.

The remote sensing investigation was limited to two transects parallel to the long axis of the parcel and relative to the size of the parcel, covered only a fraction of the property. The transects were laid out in areas where Sanborn Fire Insurance Maps suggested historic structures may be present. Essentially this work involved measuring structures from street intersections on the Sanborn maps and then field staking the locations on the ground. Unfortunately, the centerline of N. Spring Street had changed in the intervening years and threw off the measurements. It also appears that the toe of slope on the north and west sides of the project has changed over time. It is surmised that North Broadway was expanded east and south with fill and now covers areas previously part of the railroad complex. Once the geophysical work had been accomplished and the turntable identified, it was possible to overlay the remote sensing work on the Sanborns and tentatively determine the location of the historic structures and current setting.

The trenching program for the remediation effort confirmed the presence of a buried architectural element and a track feature in two of the proposed soil removal units. This evidence does not mean additional features and/or artifact deposits are not present, just that they are not present in the trenches excavated and to the depth excavated. Since the

area of remediation for each location has not been precisely defined or delineated, it is not possible to clear the areas for soil removal.

Recommendations

Based on the findings of this investigation, it has been confirmed that buried archaeological features are present in the project area and in two of the remediation zones. It is recommended that an archaeological treatment plan be developed and implemented for the soil removal effort. This plan would address the procedures, methods, and protocols for discovery and treatment of archaeological features and deposits. Chief among the elements of this plan would be the presence of an archaeological monitor during all subsurface work.

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OFFICE OF THE MAYOR

RICHARD J. RIORDAN
MAYOR

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Au John DeWitt
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Site: Unknown
Dte: unknown
Ag: U.S. dept of Commerce, EDA
Quad: Los Angeles #1103
Type: Management Plan (13)
Dev: general public use (11)

CC

Date March 1, 2000

Mr. Daniel Abeyta
State Historic Preservation Officer
California State Parks
Office of Historic Preservation
P.O. Box 942896
Sacramento, CA 94296-0001

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SUBJECT: City of Los Angeles/Cornfields Site
EDA Grant Application

Dear Mr. Abeyta:

The City of Los Angeles applied to the U.S. Department of Commerce, Economic Development Administration (EDA) for grant funds to assist with the off-site public improvements that will be undertaken as part of the development of the 32 acre River Station Industrial Park development. The site is part of a vacated 48 acre Union Pacific Railroad yard that was used as a freight depot and switching yard facility.

EDA has requested that the City contact your office and requested that you provide a written response to them indicating you have reviewed the subject project and provide your findings. To assist with your review we have attached a copy of EDA invitation letter and a copy of the Preliminary EDA Application that includes a project description and other details. (Please note that the budget included in the Preliminary Application is being revised to a lesser amount). We have also included USGS map, aerial photo, site plan and photos of the project site.

As you may know, this site is also the subject of a HUD Brownfields Economic Development Initiative grant which is being evaluated by the City's Community Development Department under its programmatic agreement implementing compliance with Section 106.

If you have questions regarding the enclosed information, or if you require any additional information, please call me at (213) 847-2646. Please send your comments directly to:

Ms. JoAnn Smith
Project Officer, Public Works Division
US Department of Commerce
Economic Development Administration
Jackson Federal Building, Room 1856
915 Second Avenue
Seattle, Washington 98174

I would also appreciate a copy of your response being forwarded to my office at:

Mr. John De Witt
Mayor's Office of Economic Development
200 North Main Street, Suite 800
Los Angeles, CA 90012

Thank you for your assistance with this matter.

Sincerely,

John De Witt
Mayor's Office of Economic Development

Enclosures

cc. Mike Boyd, EDA

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U.S. DEPARTMENT OF COMMERCE
Economic Development Administration
Jackson Federal Building, Room 1856
915 Second Avenue
Seattle, Washington 98174
Fax: (206) 220-7669

Phone: (206) 220-7660

JAN 1 1 2000

Rockard J. Delgadillo
Deputy Mayor of Los Angeles
Office of Economic Development
200 North Main Street, Room 800
Los Angeles, California 90012

Dear Deputy Mayor Delgadillo:

This letter is a formal invitation to submit an application to the Economic Development Administration (EDA) for an Economic Adjustment public works implementation grant as a result of downsizing in the defense industry. This invitation is authorized under Title II, Section 209, of the Public Works and Economic Development Act, as amended. This grant would assist the funding of your project proposal to construct infrastructure improvements that will support the development of the Cornfields site, located in the City of Los Angeles, Los Angeles County, California.

The City of Los Angeles is authorized to request a $1,400,000 EDA grant, which is 39 percent of the total estimated project cost of $3,587,744. The local matching share is $2,187,744 which will be provided by the City. An Employment Plan will be required that should include the process for dislocated defense workers, the unemployed, and underemployed to have the first opportunity for employment

The application is due February 25, 2000. Please submit one original application and exhibits, a 3.5 inch diskette(WordPerfect/Microsoft Word) with all narrative exhibits , and one copy of the application to the Project Officer, JoAnn Smith, at the above address.

An additional copy should be submitted to your Economic Development Representative, Wilfred Marshall. His address is: EDA Field Assistance Office, 8929 South Sepulveda Boulevard, Suite 414, Los Angeles, California 90045.

Ms. Smith and Mr. Marshall are available to answer your application questions. You may reach Ms. Smith at (206) 220-7689 and Mr. Marshall at (310) 348-5386.

Your SRO Project Officer will conduct an initial review of your application and notify you of any deficiencies identified. Project processing can continue providing you do not have any major deficiencies. List any known missing exhibits in your application transmittal letter.

The Seattle Regional Office has limited annual authority to invite public works grant applications. Therefore, SRO policy is to allow approximately 120 days from identification to resolution of major application deficiencies. If clearing deficiencies takes more time, EDA will suspend processing of your project proposal. Subsequently the application may be officially denied and returned to you if deficiencies persist, so EDA can consider other proposals.

This invitation to apply for a grant is not an indication EDA will approve your application. Each year EDA invites applications which collectively exceed available funds. Therefore, your project proposal will be in competition for approval with many other worthwhile projects.

Sincerely,

A. Leonard Smith
Regional Director

Enclosures

Copy to: Wil Marshall, EDR

LA-6360

OMB Approval No. 0348-0043

APPLICATION FOR FEDERAL ASSISTANCE

2. DATE SUBMITTED	Applicant Identifier
3. DATE RECEIVED BY STATE	State Application Identifier
4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier

1. TYPE OF SUBMISSION:
- ☐ Application — ☐ Construction ☐ Non-Construction
- Preapplication — ☑ Construction ☐ Non-Construction

5. APPLICANT INFORMATION

Legal Name: City of Los Angeles

Organizational Unit: Mayor's Office of Economic Development (MOED)

Address (*give city, county, State, and zip code*):
Mayor's Office of Economic Development
200 North Main Street, Suite 800
Los Angeles, CA 90012

Name and telephone number of person to be contacted on matters involving this application (*give area code*)
John De Witt, Mayor's Office of Economic Development
Phone: (213) 847-2646 Fax: (213) 680-7817

6. EMPLOYER IDENTIFICATION NUMBER (*EIN*):
9 5 — 6 0 0 0 7 3 5

7. TYPE OF APPLICANT: (*enter appropriate letter in box*) C

A. State
B. County
C. Municipal
D. Township
E. Interstate
F. Intermunicipal
G. Special District
H. Independent School Dist.
I. State Controlled Institution of Higher Learning
J. Private University
K. Indian Tribe
L. Individual
M. Profit Organization
N. Other (Specify) _____

8. TYPE OF APPLICATION:
☑ New ☐ Continuation ☐ Revision

If Revision, enter appropriate letter(s) in box(es) ☐☐

A. Increase Award B. Decrease Award C. Increase Duration
D. Decrease Duration Other (*specify*)

_____

9. NAME OF FEDERAL AGENCY:
U.S. Department of Commerce,
Economic Development Administration

10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER:
☐☐ — ☐☐☐
EDA Title IX Public Works

11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:
Public Infrastructure Improvements for Cornfields Site

12. AREAS AFFECTED BY PROJECT (*Cities, Counties, States, etc.*)
City and County of Los Angeles, California

13. PROPOSED PROJECT		14. CONGRESSIONAL DISTRICTS OF:
Start Date	Ending Date	a. Applicant: Honorable Lucille Roybal-Allard (33rd)
		b. Project: Honorable Xavier Becerra (30th)

15. ESTIMATED FUNDING:

a. Federal	$ 2,187,743
b. Applicant	$
c. State	$
d. Local	$ 2,187,744
e. Other	$
f. Program Income	$
g. TOTAL	$ 4,375,487

16. IS APPLICANT SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?

a. YES. THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372
DATE _____

b. NO. ☐ PROGRAM IS NOT COVERED BY E.O. 12372
☐ OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW

17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?
☐ Yes If "Yes," attach an explanation. ☑ No

18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT, THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.

a. Type Name of Authorized Representative	b. Title	c. Telephone Number
Rockard J. Delgadillo	Deputy Mayor	(213) 847-4217

d. Signature of Authorized Representative: Rocky Delgadillo

e. Date Signed: 8-31-99

Previous Edition Usable
Authorized for Local Reproduction

Standard Form 424 (Rev. 7-97)
Prescribed by OMB Circular A-102

OMB approval No. 0348-0041

BUDGET INFORMATION - Construction Programs

NOTE: Certain Federal assistance programs require additional computations to arrive at the Federal share of project costs eligible for participation. If such is the case, you will be notified.

COST CLASSIFICATION	a. Total Cost	b. Costs Not Allowable for Participation	c. Total Allowable Costs (Columns a-b)
1 Administrative and legal expenses (MOED)	$ 225,000.00	$ -	$ 225,000.00
2 Land, structures, rights-of-way, appraisals, etc.	50,000.00		50,000.00
3 Relocation expenses and payments			-
4 Architectural and engineering fees	417,021.00		417,021.00
5 Other architectural and engineering fees			-
6 Project inspection fees	47,660.00		47,660.00
7 Site work			-
8 Demolition and removal			-
9 Construction	2,728,487.00		2,728,487.00
10 Equipment			-
11 Miscellaneous (Indirect Costs per Cost Allocation Plan)	627,319.00		627,319.00
12 SUBTOTAL *(sum of line 1-11)*	4,095,487.00		4,095,487.00
13 Contingencies	280,000.00		280,000.00
14 SUBTOTAL	4,375,487.00		4,375,487.00
15 Project (program) income			-
16 TOTAL PROJECT COSTS *(subtract #15 from #14)*	$ 4,375,487.00	$ -	$ **4,375,487.00**

FEDERAL FUNDING

17 Federal assistance requested, calculate as follows: (Consult Federal agency for Federal percentage share.) Enter the resulting Federal share.	Eligible costs from line 16c	X 50%	$ **2,187,744**

LA-6360

CONSTRUCTION GRANT PROPOSAL

Cornfields Site

1. **Project Description:**

   a. **Briefly describe the project and the physical components of the project (include lengths, widths, sizes, quantity, etc.):**

The City of Los Angeles (City) is spearheading an effort to redevelop the 48-acre Cornfields site, immediately adjacent to one of the City's highest unemployment and poverty areas. The Cornfields site provides the opportunity to meet the socio-economic needs of the surrounding disadvantaged community by leveraging the EDA funds with a private investment of $45,000,000. This project is expected to generate 1,000 permanent "Welfare-to-Work", "Family-Wage" and higher paying jobs. The Mayor's Office of Economic Development (MOED) respectfully requests an EDA investment of $2,187,743 for this project, thus producing a job development ratio of one job per $2,188 invested by EDA.

The Cornfields site development is one of the 15 Genesis L.A. projects that Mayor Richard J. Riordan unveiled in his annual Economic Vision Address in March 1999. Genesis L.A. is a ground breaking economic development initiative to generate more than 5,000 quality jobs and $250 million in new private investment for the inner city. Genesis L.A. will develop 15 underutilized or blighted industrial/retail sites with the goal of turbo-charging development in Los Angeles' center city areas, reducing crime and blight in neighborhoods, promoting economic prosperity for minority communities, connecting growth industries to targeted sites, and increasing tax revenues from targeted sites.

The current vision for the overall 48-acre site is a mixed-use development of manufacturing and retail that includes approximately 986,270 square feet of office building. The completed project will generate up to 1,000 "Welfare-to-Work", "Family-Wage" and higher paying jobs for the surrounding community and leverages the EDA funds with a private investment of $45,000,000. The developer, Majestic Realty Co. (experienced in master planned business parks and mixed-use business communities) has developed a flexible plan that is ideal for the Downtown market targeting manufacturing, food processing, distribution, and import/export companies that currently make up the majority of businesses expanding within the Downtown area. All buildings will be less than 40 feet in height and include 160,000 square feet of mezzanine space. The buildings will be built on 32 acres of the site, the remaining 16 acres will be set aside for the MTA Blue Line and other development. The City of Los Angeles and the local residents are in favor of this project.

The Cornfields site is one of the few sites within the northeastern Downtown Los

Angeles corridor that are of sufficient size, configuration and accessibility that can make a major impact on accomplishing the socio-economic development objectives of the East Los Angeles Comprehensive Economic Development Strategy. Besides upgrading the area's physical and economic environment, the proposed development will provide up to 1,000 permanent "Welfare-to-Work", "Family-Wage" and higher paying jobs to local residents in adjacent economically disadvantaged communities.

The public infrastructure project proposed for EDA FY 2000 funding consists of: street widening and other improvements along North Spring, North Broadway and Baker Streets (e.g., utility relocations -power poles and water mains, new storm drain construction, traffic signal equipment upgrades, etc.) All of the EDA eligible funded improvements will be located within the City of Los Angeles dedicated public rights-of-way or easements.

The EDA Project Budget estimates include costs for: (1) design, (2) construction, (3) direct and indirect construction engineering inspection services and administrative expenses, and (4) contingencies, which brings the total project budget to $4,375,487. All of the EDA eligible funded improvements totaling $2,187,743 will be located within the City of Los Angeles dedicated public rights-of-way or easements. The EDA funded public improvement project includes the following:

TYPE OF INFRASTRUCTURE	AMOUNT (# OR LINEAR FEET)
1. Rights-of-Way	Allowance
2. Utility Relocation	Allowance
3. Street Improvements	4,485 L.F
4. Sidewalks	
5. Curbs and gutters	
6. Storm drains	1,121 L.F.
7. Sewer	2,243 L.F.
8. Traffic signal lights + ATSAC	1 EA. + ATSAC
9. Street lights	75 EA.
10. Landscaping (Street trees)	128 EA.

EDA Fiscal Year 2000 funding approval will close the project-financing gap and will spark the proposed Cornfields development project generating up to 1,000 permanent "Welfare-to-Work", "Family-Wage" and higher paying jobs to local residents in nearby economically disadvantaged communities.

b. Location of project: (city, county, state, street address)

The project site is bounded by North Broadway on the northwest, North Spring

Street on the southeast, Baker Street on the east, and Ln Ling Way on the west in the City and County of Los Angeles, State of California.

Project vicinity map is attached.

2. **Project Purpose: Briefly describe the purpose and need for the project and how it will support development objectives in the community planning process (e.g., Comprehensive Economic Development Strategy (CEDS) and Economic Adjustment Strategy) and serve to meet the pressing physical and economic needs of the local area.**

The purpose of the Cornfields site is to capitalize on the retention and needed facility expansion of Downtown Los Angeles manufacturing, food processing, distribution, and import/export businesses. The development of this site will generate up to 1,000 permanent "Welfare-to-Work", "Family-Wage" and higher paying jobs to local residents in nearby economically disadvantaged communities.

The proposed project site is centrally located between Chinatown, Lincoln Heights, and the old industrial core of the City of Los Angeles. The project site is within the Federal Empowerment Zone, the State Enterprise Zone, and the City's Tax Free Zone. The project is designed to create quality jobs and support sustainable community development. The complete project will have significant impact on rebuilding communities in inner city of Los Angeles, specifically in the East Los Angeles area.

The surrounding community consists of light to heavy industrial manufactures, a housing facility, and the Chinatown. The surrounding community has an unemployment rate of 11%[1], which is **6.9% greater** than the national average and a per capita income of $7,189[2], which is **49.85%** of the national average. The ethnic make-up of the surrounding community consists of 16% of Black, 27% of Asian/Pacific Islander, and 47% of Hispanic origin[3]. The high unemployment and underemployment will be the focus of the City's employment plan as well as the employment plan for the project.

For decades, the surrounding communities have been hit hard from the recession, 1992 civil unrest, 1994 Northridge earthquake, and other economic distress. The surrounding area has been one of the highest unemployment areas in the City and is targeted for economic revitalization and investment. The redevelopment plan will provide flexibility for the build-out and leasing (or sale) of the office. The complete

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1 California Employment Development Department, 1998 Annual Average Labor Force Estimates
2 U.S. Bureau of Census, 1990 Census Data
3 U.S. Bureau of Census, 1990 Census Data

office buildings will be ideal for the downtown market and is designed to target manufacturing, food processing, distribution, and import/export companies which make up the majority of businesses in the downtown area.

The Cornfields redevelopment is one of the 15 Genesis L.A. projects that Mayor Richard J. Riordan unveiled in his annual Economic Vision Address in March 1999. Genesis L.A. is a ground breaking economic development initiative to generate more than 5,000 quality jobs and $250 million in new private investment for the inner city. Genesis L.A. will develop 15 underutilized or blighted industrial/retail sites with the goal of turbo-charging development in Los Angeles' center city areas, reducing crime and blight in the neighborhoods, promoting economic prosperity for minority communities, connecting growth industries to targeted sites, and increasing tax revenues from targeted sites.

The Mayor's Office of Economic Development has been working with the City Council Office, local communities, and potential developers to bring the best development and quality jobs to the needed area. The development of the site is extremely important to the City's economic revitalization and is conformance with the City's economic vision and the City's planning requirements.

3. **Project Impact:**

a. What will the project do to meet the needs as identified in the project purpose?

The Cornfields project will provide one of the area's first major on-site private investments in nearly five decades. This public-private partnership will provide the major catalyst for the area's long-term revitalization and the needed "ripple effect" to boost the area's economic confidence and capacity to attract additional businesses and further investment.

The proposed public infrastructure improvements (e.g., street improvements and other transportation related improvements) will physically and economically rejuvenate the area as well as facilitate the retention and needed facility expansion of Downtown Los Angeles manufacturing, food processing, distribution, and import/export businesses. These businesses will provide up to 1,000 permanent "Welfare-to-Work", "Family-Wage" and higher paying jobs to local residents in neighboring economically disadvantaged communities.

b. **Identify the beneficiaries (companies or firms that will benefit) of the project:**

Company Name & Product(s)	Jobs Saved	New Jobs 0-2 Yrs/ 3-5 Yrs	Committed or Interest Only
Mission Foods		400	Interested
Others		600	Interested
TOTAL		1,000	1,000

c. **Estimate any additional job potential not previously listed. Give examples for estimate.**

Besides the up to 1,000 permanent "Welfare-to-Work", "Living Wage" and higher paying jobs, an additional 700 construction-related jobs are expected in the development of this project.

d. **Describe how unemployed, underemployed, dislocated workers and low-income individuals will benefit from the project.**

The City brings together the project's developer and the local Private Industry Council (PIC) to develop an Employment Plan for the overall development and incoming businesses. The City's PIC is partially funded with Job Training Partnership Act (JTPA) funds. This employment Plan delivers advance job training opportunities for local disadvantaged residents that lead to "Welfare-to-Work", "Family-Wage" or higher paying jobs. Job training is completed in time (prior to the project's construction completion) to ensure that local disadvantaged residents gain a favorable position in securing new jobs. Companies who decide to locate and hire through this program will further benefit from tax credits from Federal and State agencies.

e. **Estimate of private investments that will occur as a result of the project (give explanation.)**

A private investment of $45,000,000 will occur based upon the current scope of development and related costs.

The City and its private sector partners are also committed to providing the following funds and in-kind services to make the project financially feasible:

City of Los Angeles

1. City Tax Free Zone (no business taxes for first 5 years)
2. Department of Water And Power Discounts
3. Variety of financing packages
4. L.A. One Stop Capital Shop
5. Project expediting

Project Developer

1. Substantial financial commitment in the form of equity and loans in order to leverage Federal and local financial support
2. Development of an Employment Plan (in conjunction with JTPA/"Welfare-to-Work" programs)

Financial Institutions – Genesis LA Sponsors (Loan Commitments)

1. Washington Mutual
2. Bank of America
3. Wells Fargo

4. Preliminary Budget Estimates

Cost Classification	EDA PART	OVERALL
1. Administrative Costs MOED	$ 112,500	$ 225,000
2. Land, structures and rights-of-way appraisals, etc.	25,000	50,000
3. Relocation expenses and payments		
4. Architectural and engineering fees	208,510	417,021
5. Other architectural and engineering fees		
6. Project inspection fees	23,830	47,660
7. Indirect Costs PW	313,659	627,319
8. Construction, demolition, equipment	1,364,244	2,728,487
9. Contingencies	140,000	280,000
Total Project Costs	**$2,187,743**	**$4,375,487**

Funding Sources	
EDA	$2,187,743
*Other Fed. Grant	_____
*Federal Loan	_____
*State Grant	_____
*Local	$2,187,744
Total Funding	$4,375,487

5. **Will an entity other than the applicant be responsible for operations and maintenance of the facilities to be constructed by this EDA request? If yes, name of entity and its working relationship to the applicant.**

No, the City of Los Angeles will own, operate and maintain the EDA funded improvements.

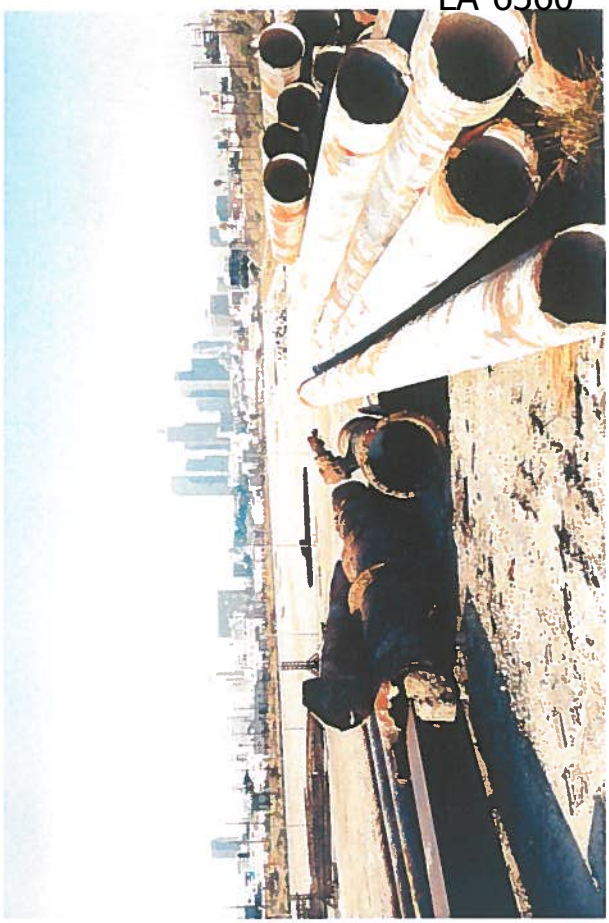
6. **Who will hold title to the land, right-of-way and/or easements and the facilities to be constructed by this EDA request?**

The City of Los Angeles will hold title to the EDA funded improvements.

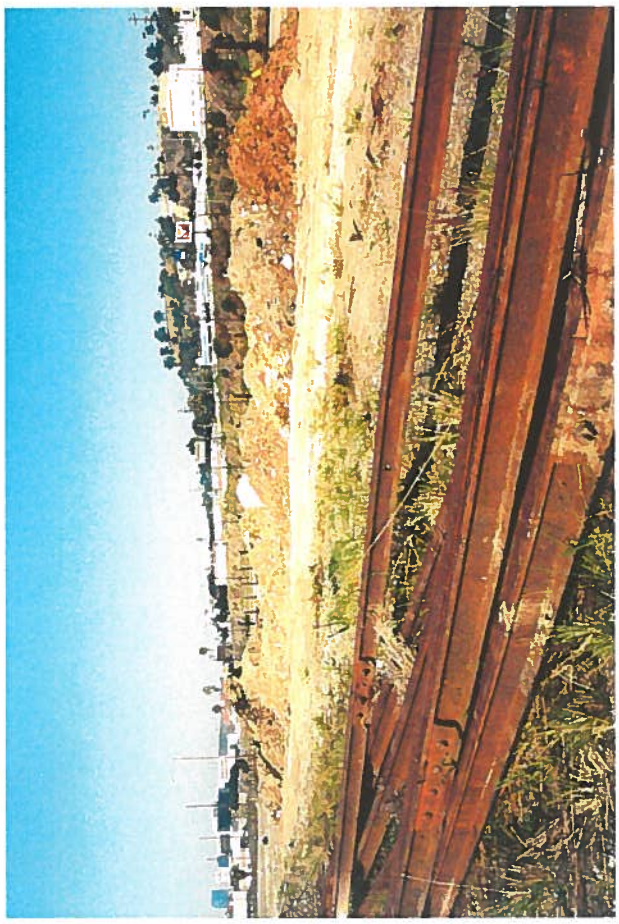
7. **Performance Measures: The Government Performance and Results Act (GPRA) of 1993, requires EDA to report the outputs and outcomes of projects (e.g. actual job creation). Awardees will be required to submit core indicators of performance to EDA periodically as a condition of the award. EDA's core indicators can be supplemented by indicators you would like to use. Explain the additional performance indicators you propose to use and how they will supplement the required programmatic core indicators for this project.**

The Mayor's Office of Economic Development has reviewed EDA's core indicators of performance. Our office is confident that this project will meet and/or exceed the required programmatic indicators such as: job creation and retention; leveraging of private sector investment; increased tax base; local planning and community participation; encourage partnerships with State and regional development organizations; as well as facilitation of future growth industries; types of jobs ("Welfare-to-Work", "Family-Wage" and higher paying jobs); etc.









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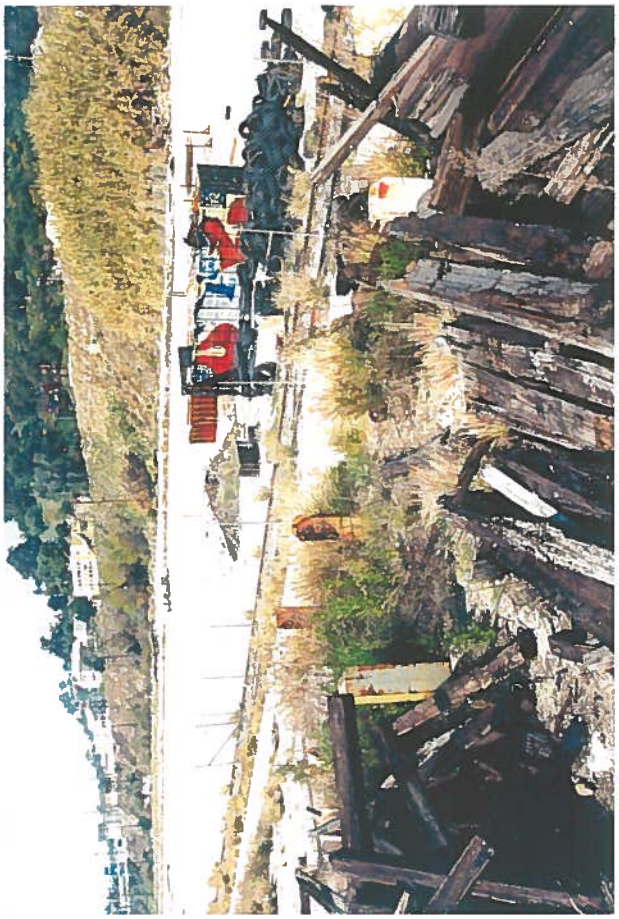

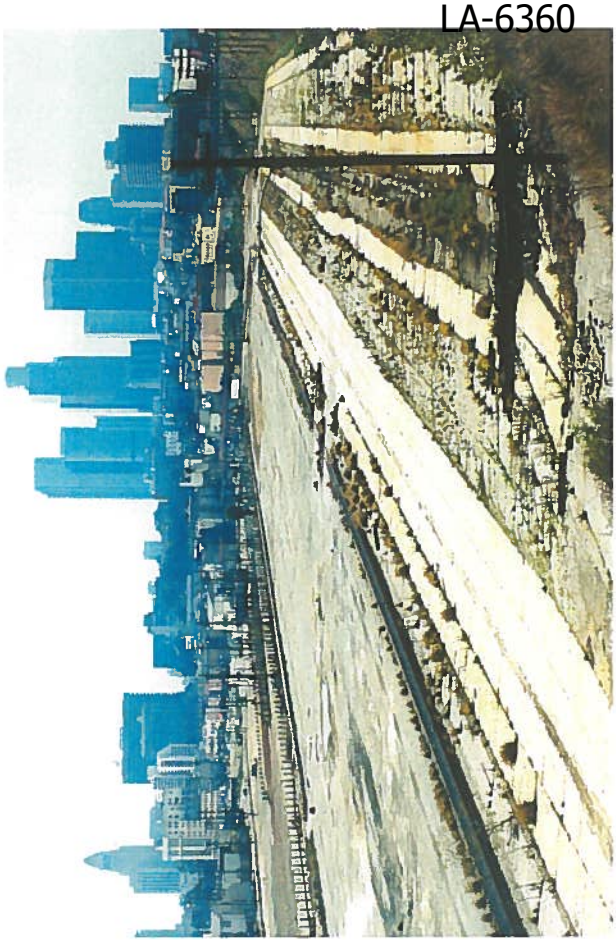





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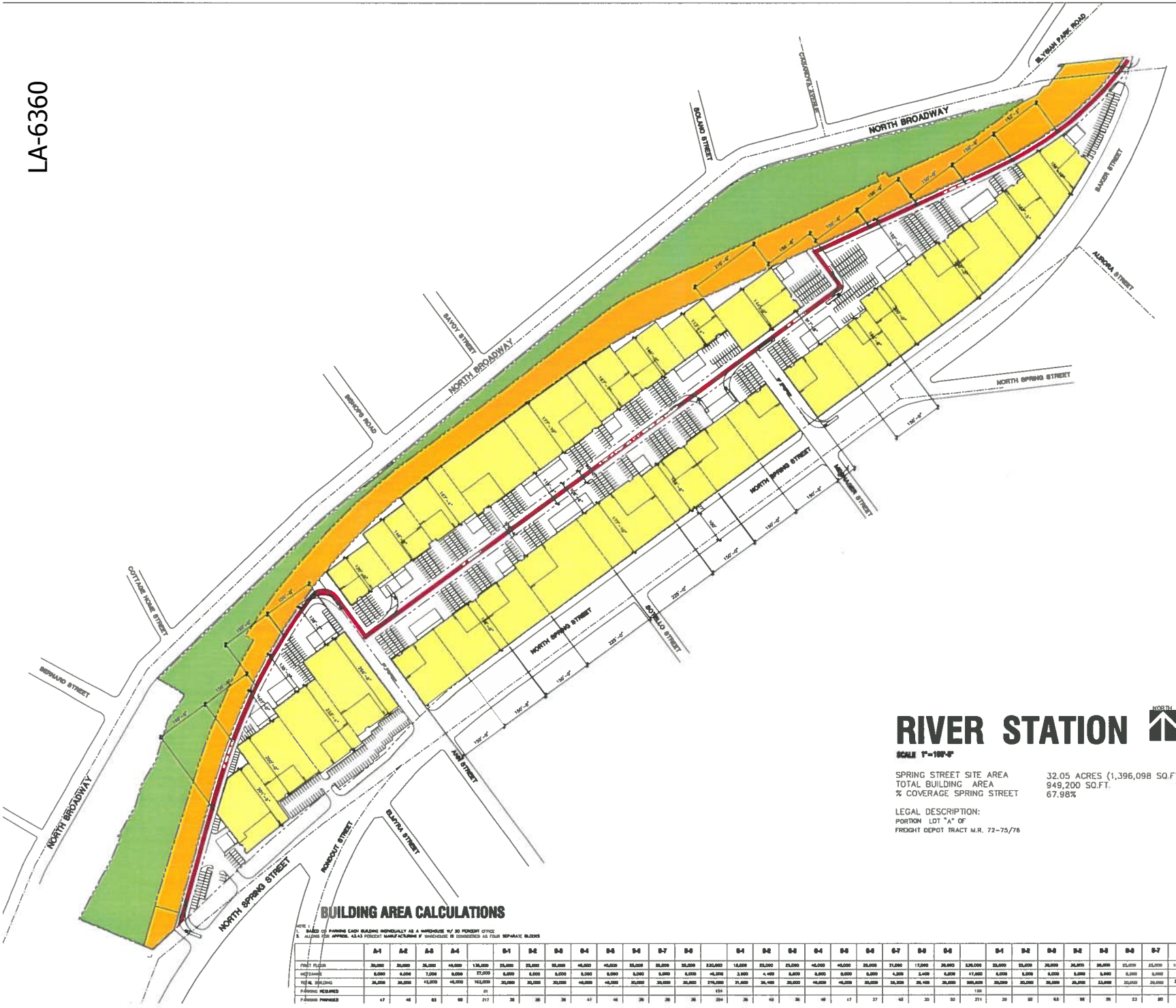


RIVER STATION

SCALE 1"=100'-0"

NORTH

SPRING STREET SITE AREA — 32.05 ACRES (1,396,098 SQ.FT.)
TOTAL BUILDING AREA — 949,200 SQ.FT.
% COVERAGE SPRING STREET — 67.98%

LEGAL DESCRIPTION:
PORTION LOT "A" OF
FREIGHT DEPOT TRACT M.R. 72-75/76

BUILDING AREA CALCULATIONS

NOTE 1:
1. BASED ON PARKING EACH BUILDING INDIVIDUALLY AS A WAREHOUSE W/ 20 PERCENT OFFICE
2. ALLOWS FOR APPROX. 43.43 PERCENT MANUFACTURING IF WAREHOUSE IS CONSIDERED AS FOUR SEPARATE BLOCKS

	A-1	A-2	A-3	A-4		B-1	B-2	B-3	B-4	B-5	B-6	B-7	B-8		B-1	B-2	B-3	B-4	B-5	B-6	B-7	B-8	B-9		B-1	B-2	B-3	B-4	B-5	B-6	B-7	TOTAL
FIRST FLOOR	30,000	30,000	35,000	40,000	135,000	25,000	25,000	35,000	40,000	40,000	35,000	35,000	30,000	330,000	18,000	23,000	25,000	40,000	40,000	25,000	21,000	17,000	20,000	329,000	23,000	25,000	30,000	20,000	20,000	25,000	25,000	1,396,098 SQUARE FEET
MEZZANINE	6,000	6,000	7,000	8,000	27,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	46,000	3,600	4,400	5,000	5,000	5,000	5,000	4,200	3,400	5,000	47,600	5,000	5,000	5,000	5,000	5,000	5,000	5,000	276,600 SQUARE FEET
TOTAL BUILDING	36,000	36,000	42,000	48,000	162,000	30,000	30,000	40,000	45,000	45,000	40,000	40,000	35,000	376,000	21,600	27,400	30,000	45,000	45,000	30,000	25,200	20,400	25,000	376,600	28,000	30,000	35,000	25,000	25,000	30,000	30,000	1,672,698 SQUARE FEET
PARKING REQUIRED					81									184										138								405 SPACES SEE NOTE 1
PARKING PROVIDED	47	48	53	60	217	38	38	38	47	48	38	38	38	384	26	40	36	48	47	37	43	33	30	274	30	33	43	30	28	33	30	1,369 SPACES SEE NOTE 2

SEGAL/REA
ARCHITECTURE

3435 Ocean Park Boulevard, Suite 112
Santa Monica, CA 90405
Phone (310) 828-3181
FAX (310) 399-0440

ARCHITECT

RIVER STATION LLC
c/o
MAJESTIC
REALTY COMPANY

13191 CROSSROADS
PARKWAY NORTH
6TH FLOOR
CITY OF INDUSTRY, CA 91746
TEL (562)692-9581

CLIENT

RIVER STATION

1245 NORTH SPRING STREET
LOS ANGELES, CALIFORNIA

PROJECT

OWNER

PROJECT NO	98002
DATE	SEP 27, 1999
DRAWN BY	DRB/MCH/BRH

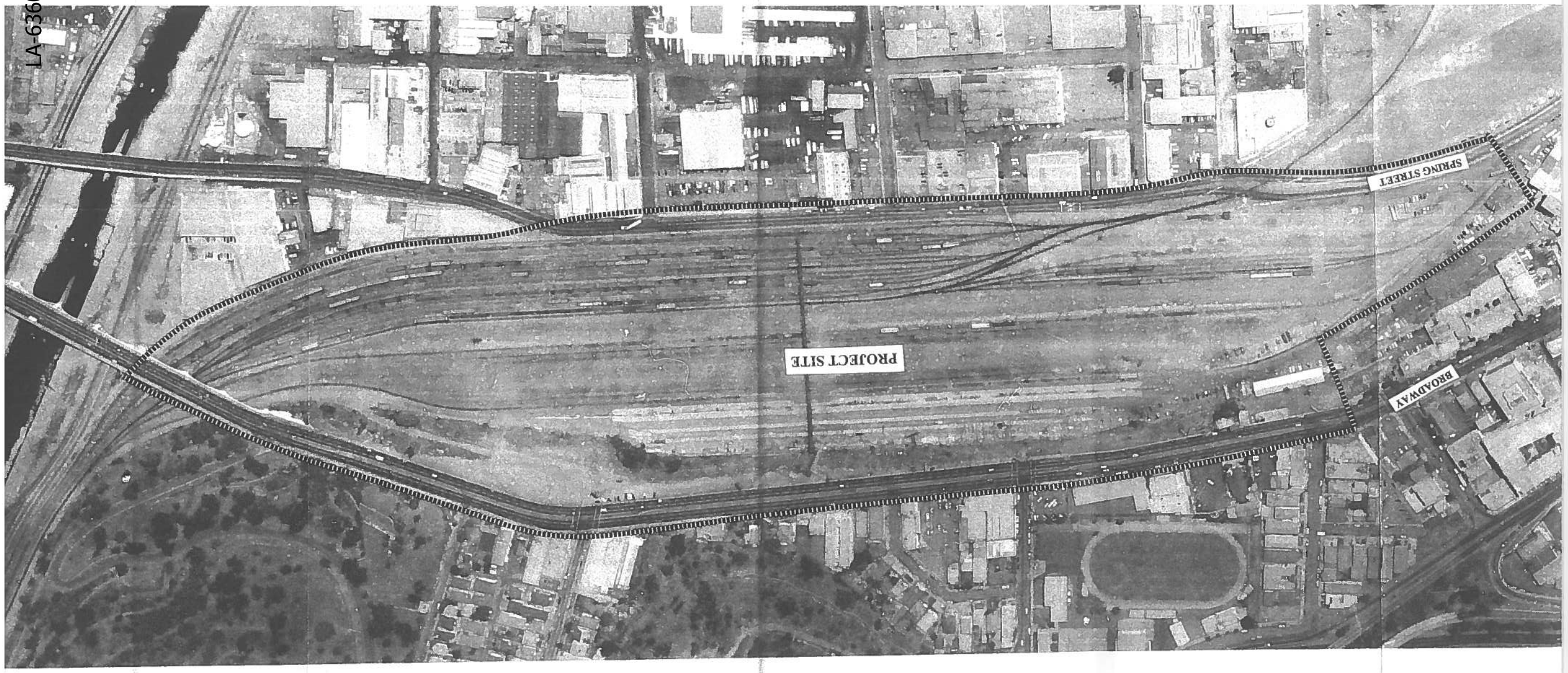
REVISIONS

1. PER BHE DATED JULY 28,1999

SHEET CONTENT
SITE DEVELOPMENT PLAN

SHEET NUMBER
SD-1

LA-6360



LA-6360

STATE OF CALIFORNIA – THE RESOURCES AGENCY
GRAY DAVIS, *Governor*

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 653-6624 Fax: (916) 653-9824
calshpo@mail2.quiknet.com

April 3, 2000

REPLY TO: EDA000303A

John De Witt
Mayor's Office of Economic Development
200 North Main Street, Suite 800
LOS ANGELES CA 90012

Re: City of Los Angeles/Cornfields Site Economic Development Administration Grant Application, Los Angeles, Los Angeles County.

Dear Mr. De Witt:

Thank you for submitting to our office, on behalf of the Economic Development Administration (EDA), your March 1, 2000 letter and supporting documentation regarding the proposed off-site public improvements connected with the development of the Cornfields site, located in the City of Los Angeles (City), Los Angeles County. The site is part of the 32 acre River Station Industrial Park development, which, in turn, is part of the a vacated 48 acre Union Pacific Railroad yard that was used as a freight depot and switching yard facility. The City has applied to the EDA for grant funds to assist with the proposed undertaking. The City has also informed us the aforementioned site is also the subject of a Housing and Urban Development (HUD) Brownsfields Economic Development Initiative grant which is being granted under its programmatic agreement implementing compliance with Section 106 of the National Historic Preservation Act.

The City, on behalf of the EDA, is seeking our comments on the proposed undertaking in accordance with 36 CFR 800, regulations effective June 17, 1999 implementing Section 106 of the National Historic Preservation Act. Our review of the submitted documentation leads us to recommend that the EDA, with the City's assistance, address the following requirements:

- Establish an Area of Potential Effects (APE), as defined in 36 CFR 800.16(d), to determine the scope of the undertaking and its potential to effect historic properties

- Identify and provide information on any historic properties within or adjacent to the project APE that may be affected by the undertaking and gather sufficient information to evaluate the eligibility of these properties for the National Register of Historic Places (NRHP). This information should include information on the age of the property, its historical significance, if any, as well as historical and/or current photographs of the property. In the case of potentially significant archeological properties, the City should provide information on proposed treatments for significant resources that are already known to exist or that are discovered during implementation of the undertaking.

Thank you again for seeking our comments on your project. We look forward to assisting your further. If you have any questions, please contact staff historian Clarence Caesar at (916) 653-8902.

Sincerely,

Daniel Abeyta, Acting
State Historic Preservation Officer

Cc: JoAnn Smith, EDA, Seattle, WA

LA-03497

LA3497

EXECUTIVE SUMMARY

* indexed Report
24 pgs
13] management Plan / EIR
no sites acres?
monument status by City of LA:
- Southwest museum
- Ziegler Estate
- Casa de Adobe
#5123, 5518 and 5522 marmion way
- Johnson & Johnson / merck facility
1103 - Los Angeles
1102 - Pasadena
1101 - mt. Wilson
T-
R-
section
Zm
11] general Public works

Draft

Supplemental Environmental Impact Report
Pasadena-Los Angeles Light Rail Transit Project

SCH# 93121099
Contract ENO-26
CWO No. 002, SIER
March 25, 1994

Prepared for

Agency **Los Angeles County Metropolitan Transportation Authority**
Los Angeles, California

Prepared by

Tetra Tech, Inc.
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SECTION 1.0
INTRODUCTION

1.1 PURPOSE AND USE OF THE SEIR

Two Supplemental Environmental Impact Reports (SEIRs) are referred to herein: 1) the first SEIR that was prepared in 1992 (LACTC), and 2) this document that constitutes a second SEIR. The subject SEIR for the proposed Pasadena - Los Angeles Light Rail Transit (LRT) Project analyzes the potential environmental effects that may result from the approval of a second set of planning and design modifications to the project as specified in the antecedent EIR [State Clearinghouse Nos. 88042713 (Revised Draft) and 89082327 (Final)] and first SEIR (State Clearinghouse No. 92071005). A Mitigated Negative Declaration was also adopted in August 1992 for the relocation of the Chinatown Station. The subject SEIR has been prepared pursuant to the California Environmental Quality Act (CEQA) of 1970, as amended [Public Resources Code (PRC), Section 2100 et seq.] and in accordance with the State CEQA Guidelines, as amended [California Administrative Code (CAA), Title 14, Section 1500 et seq.]. The Los Angeles County Metropolitan Transportation Authority (LACMTA) is the designated CEQA "Lead Agency" for the project (PRC, Section 21067). The LACMTA is proposing the subject project modifications through its subsidiary, the Rail Construction Corporation (RCC), and is also considered the Project Proponent. Other agencies will use this SEIR as the basis of their decisions to issue approvals or permits. A list of agencies that are expected to use this SEIR for that purpose is provided in Table 1.1-1.

One project that may be implemented concurrently with the LRT Project, or in the reasonably foreseeable future, has been identified in the vicinity of the light rail alignment. It consists of potential Metrolink rail service in the Northern San Gabriel - San Bernardino Valley (NSG-SBV) rail transit corridor. Potential cumulative impacts of the LRT Project in association with the Metrolink Project are discussed in Section 2.3, Cumulative Impacts.

Project areas

The proposed action consists of issues affecting the LRT alignment in the following five areas: (1) along Marmion Way in Mount Washington; (2) in the vicinity of Marmion Way and Figueroa Street in Highland Park; (3) in the vicinity of Arroyo Seco Park in Highland Park; (4) in South Pasadena; and (5) in the vicinity of Sierra Madre Villa in east Pasadena. In addition to the issues affecting the LRT alignment, the proposed action includes issues affecting Elysian Park and Midway Yard in the vicinity of the City of Los Angeles Department of Water and Power (LADWP) Buena Vista Pump Station, located south of the intersection of State Highway (SH)-110 (Pasadena Freeway) and the Los Angeles River. Midway Yard is a railroad switchyard formerly operated by the Atchison, Topeka and Santa Fe Railroad (AT&SF). The portion of Midway Yard adjacent to the LADWP facilities has been removed in anticipation of development by LACMTA as approved in the Final EIR and first SEIR (LACTC, 1990 and 1992, respectively). There are presently only two tracks in this area, running parallel and adjacent to the Los Angeles River.

Table 1.1-1

Summary of Potential Federal, State, and Local Permits and Authorizations Required for Proposed Pasadena-Los Angeles LRT Project

Agency	Concern	Action Requiring Permit, Approval, or Review	Permit, Approval, or Review	Statutory Authority
FEDERAL				
State Historic Preservation Officer (SHPO); Advisory Council on Historic Preservation; Native American Groups	Cultural Resources	Grant of ROW or permit by federal agency	Section 106 Compliance as outlined by National Historic Preservation Act	National Historic Preservation Act of 1966 and Archaeological & Historic Preservation Act of 1974 - and implementing regulations (36CFR800); Native American Indian Religious Freedom Act of 1978; Native American Graves Protection and Repatriation Act of 1990
STATE OF CALIFORNIA				
Department of Transportation (Caltrans)	Transportation/ Circulation	• Encroachment within, under or over State highway right-of-way	Encroachment Permit	California Streets and Highways Code, Section 660 to 734
		• Roadway closures, turn restrictions, and signal control changes	Review and approval	California Streets and Highways Code
		• Signal retiming, potential signal and/or detector installation, lane restriping; and parking restrictions	Review and approval	California Streets and Highways Code
State Historic Preservation Officer (SHPO)	Cultural Resources	Impacts, if any, at Figueroa St.-Marmion Way excavation	(CEQA, Appendix K compliance	CEQA of 1970, as amended (Public Resources Code 2100 et seq.)
REGIONAL, INCLUDING COUNTY				
LACMTA	Noise and Vibration	Demolition and/or construction of buildings; excavation activities	Consistency Determination	[LAC]MTA Systemwide Criteria
	Housing	Relocation services/payments	Approval of State funds	California Relocation Act (California Government Code Sections 7260, et. seq.)

Table 1.1-1

Summary of Potential Federal, State, and Local Permits and Authorizations Required for Proposed Pasadena-Los Angeles LRT Project (continued)

Agency	Concern	Action Requiring Permit, Approval, or Review	Permit, Approval, or Review	Statutory Authority
REGIONAL, INCLUDING COUNTY (CONTINUED)				
SCAQMD	Air Quality	Buildings construction and operation	Consistency Determination	1991 Air Quality Management Plan; Clean Air Act of 1990 (42 United States Code 7401 et.seq., as amended)
	Asbestos Emissions	Park and Ride facility construction; demolition and/or renovation of structures	Written notification	SCAQMD Rule 1403
	Fugitive Dust Emissions	Demolition and/or construction of buildings; excavation activities	Fugitive Dust Plan notification for operations exceeding 10,000 cu yd/day of earth moving	SCAQMD Rule 403
CITY				
City of Los Angeles, Board of Public Works, Bureau of Engineering	Earth Resources	Trenching, excavation, and geotechnical drilling in public streets around Figueroa St.-Marmion Way	Excavation Permit (includes geotechnical drilling)	City of Los Angeles Municipal Code, Sections 6206 and 6203
	Transportation/ Circulation	• Store equipment/light vehicles on public streets; erect minor construction fencing	Street Use Permit	California Streets and Highways Code
		• Roadway closures, turn restrictions, and signal control changes	Review and approval	California Streets and Highways Code
	Construction and Excavation	Curb Cuts; Sewer Relocation (Figueroa St.-Marmion Way excavation)	"A" Permit - relocation of main and curb cuts; "B" Permit - lateral sewer lines	City of Los Angeles Municipal Code: Section 62.106B for "A" Permit; Section 62.109 and 64.15 for "B" Permit

Table 1.1-1

Summary of Potential Federal, State, and Local Permits and Authorizations Required for Proposed Pasadena-Los Angeles LRT Project (continued)

Agency	Concern	Action Requiring Permit, Approval, or Review	Permit, Approval, or Review	Statutory Authority
CITY (CONTINUED)				
City of Los Angeles, Board of Public Works, Bureaus of Engineering and Street Maintenance	Public Services and Safety	Property acquisitions and street improvements	Street Vacations Permits, Street Closure Permits, ROW Dedication Approvals, other misc. permits for curb cuts/other street improvements	Los Angeles Municipal Code, Chapter 6 [and California Government Code, Section 66000 et seq. (Subdivision Map Act)]
City of Los Angeles, Department of Building and Safety	Earth Resources	Excavation/fill in public streets around Figueroa St.-Marmion Way	Grading Permit	City of Los Angeles Building Code - Grading, Section 91.301C
Cities of Los Angeles, Pasadena, and South Pasadena	Seismic Safety	Building construction	Consistency Determination	Seismic Safety Plan as an Element to the General Plan, California Health and Safety Code, Section 65302(b); Uniform Building Code
	Noise	Building construction and operation	Consistency Determination	Noise Element to the General Plan, California Health and Safety Code; Noise Ordinances
City of Pasadena, Public Works and Transportation Department	Transportation/ Circulation	Signal retiming, potential signal and/or detector installation, lane restriping; and parking restrictions	Review and approval	California Streets and Highways Code
Los Angeles Department of Transportation	Public Services and Safety	Street closures/access limitation; placement of medians	Detour plan, final striping plan, modifications to approved street plans, and related street use permits as needed	Los Angeles Municipal Code, Chapter 6 [and California Government Code, Section 66000 et seq. (Subdivision Map Act)]

Table 1.1-1

Summary of Potential Federal, State, and Local Permits and Authorizations Required for Proposed Pasadena-Los Angeles LRT Project (continued)

Agency	Concern	Action Requiring Permit, Approval, or Review	Permit, Approval, or Review	Statutory Authority
CITY (CONTINUED)				
City of Pasadena, Planning Department	Public Services and Safety	Development of Park and Ride facility	Approval necessary to construct Park and Ride facility on vacant commercial property	Pasadena Municipal Code - Zoning [and California Government Code, Section 65800 et seq. (Subdivision Map Act)]
City of Pasadena, Public Works Department	Public Services and Safety	Development of Park and Ride facility	Grading Permit, Building Permit, and other permits to construct and operate	Pasadena Municipal Code - Permits [and California Government Code, Section 66000 et seq. (Subdivision Map Act)]
City of Los Angeles Cultural Heritage Commission	Cultural Resources	Figueroa St.-Marmion Way excavation and Marmion Way property acquisitions	Approval of project if impacts structures listed by Commission as historic properties	City of Los Angeles Administrative Code, Sections 22.120, 22.125.1, 22.136, and 162102
City of Los Angeles, Mechanical Bureau Services	Construction	Mechanical, plumbing, and electrical installations	Utility Permits	City of Los Angeles Municipal Code

CEQA - California Environmental Quality Act
LACMTA - Los Angeles County Metropolitan Transportation Authority
PUBLIC RESOURCES CODE - Public Resources Code
ROW - Right-of-way
SCAQMD - South Coast Air Quality Management District

The types of planning and design modifications proposed include the following improvements:

(a) a change from street-running to semi-exclusive train operation along Marmion Way in Mount Washington and Highland Park;

(b) five additional street closures in Highland Park;

(c) additional property acquisition (10 structures located on six parcels and a total of approximately 50 minor curb cuts in Mount Washington and Highland Park) to provide adequate emergency vehicle access to streets along Marmion Way between Avenues 51 and 59;

(d) additional property acquisition (three parcels in Arroyo Seco Park) to provide temporary easements for Arroyo Seco Bridge renovation activities;

(e) additional property acquisition (one parcel in Elysian Park) for construction of an access road between the LADWP Buena Vista Pump Station and Midway Yard (formerly an AT&SF switchyard);

(f) sound barrier wall modifications along Marmion Way in Mount Washington and Highland Park, and in South Pasadena;

(g) a below-grade separation option in the vicinity of Marmion Way and Figueroa Street in Mount Washington; and

(h) a change in alternative locations for a Park and Ride facility located at Madre Street/Sierra Madre Villa and the Foothill (210) Freeway in east Pasadena.

These proposed planning and design modifications that constitute the Proposed Action are considered not to be exempt as a Specified Mass Transit Project as defined in the applicable CEQA Guidelines (CAA, Section 15275) and, therefore, are considered a "project" as defined under CEQA (PRC, Section 21065) and in the CEQA Guidelines (CAA, Section 15378). Additionally, the proposed action is considered to be an individual project developed pursuant to the 1993 Los Angeles County Transportation Improvement Program and, therefore, is subject to CEQA (CAA, Section 152765).

The LACMTA designation as Lead Agency refers to the public agency which has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment (PRC, Section 21067). The LACMTA as Lead Agency has the authority to grant project approval and the discretion to determine whether a Negative Declaration (ND), Mitigated Negative Declaration (MND), or an Environmental Impact Report (EIR) shall be prepared for the project based on Initial Study (IS) results.

The LACMTA determined that under CEQA Guidelines (CAA, Section 15162), a second SEIR is required because:

(a) subsequent changes are proposed in the project which will require important revisions of the previous EIR (and first SEIR) due to the involvement of new significant environmental impacts not considered in a previous EIR (or first SEIR);

(b) new information of substantial importance to the project has become available; and

(c) the information was not known and could not have been known at the time the previous EIR (and first SEIR) was certified as complete.

Additionally, new information presented the following conditions, requiring an SEIR:

(a) the project will have one or more significant effects not discussed previously in the EIR (or first SEIR);

(b) significant effects previously examined may be substantially more severe than shown in the EIR (or first SEIR);

(c) mitigation measures or alternatives previously found not to be feasible may, in fact, be feasible and may substantially reduce one or more significant effects of the project; and/or

(d) mitigation measures or alternatives which were not previously considered in the EIR (or first SEIR) may substantially lessen one or more significant effects on the environment.

This second SEIR is prepared to address subsequent changes proposed to the project that have resulted in the identification of new information of substantial importance, due to a reevaluation of mitigation measures and alternatives. Where alternative Park and Ride facilities are being considered, this document assesses potential significant impacts that were not addressed in the certified EIR and SEIR. The intent of this second SEIR is to address only the information necessary to make the previously certified EIR and SEIR adequate for the project, as revised (CAA, Section 15163).

1.2 SEIR FOCUS AND EFFECTS NOT FOUND TO BE SIGNIFICANT

The LACMTA, as CEQA Lead Agency, issued its Notice of Preparation (NOP) for the subject Project on November 24, 1993. An initial study, including an environmental checklist form was appended. Both documents are included herein as Appendix A.

The results of this initial environmental assessment indicated that the proposed action as defined in Section 1.1 would have no potentially significant effect on the following environmental resources/issues: plant and animal life, light and glare, land use, natural resources, population, energy, utilities, aesthetics, and recreation. The proposed action, however, may have a potentially significant effect on: earth resources, air quality, water resources (groundwater), noise and vibration, risk of upset, housing, transportation/circulation, public services, human health, and cultural resources.

The LACMTA sent the NOP to 332 agencies and organizations, with responses received from three interested parties, two State and five local agencies (see Appendix B). Late comments were considered in this SEIR. Environmental resource/issue areas identified within those responses as important for consideration in the SEIR include earth resources, air quality, noise and vibration, transportation/circulation, safety, and cultural resources. As a result, the subject SEIR scope remained the same as initially assessed and became the focus of this investigation.

1.3 PUBLIC REVIEW PROCESS

The LACMTA is committed to providing extensive public involvement in the environmental review process for the Pasadena-Los Angeles LRT Project. The preparers of the Draft SEIR will respond, in writing, to those substantive comments received during the public circulation of the Draft SEIR. The comments and the responses to comments will be provided in the Final SEIR prepared following the public review period of the Draft SEIR.

Public officials, affected agencies, and the general public have the opportunity to review and comment on this SEIR during a 45 day review period established and administered by the State of California Office of Planning and Research (OPR). During this review period, persons and organizations wishing to comment on the content of this document may submit their comments in writing to the LACMTA at the following address: 818 West 7th Street, Suite 500, Los Angeles, California 90017; Attention: Mr. Harley Martin, Environmental Specialist.

1.4 FORMAT OF THIS SEIR

The format of this SEIR is similar to the format of the first SEIR prepared for the proposed Pasadena-Los Angeles LRT Project. This SEIR consists of the following sections:

1. Introduction: Includes the purpose and focus of the SEIR, an overview of the public review process, and SEIR format;

2. Summary: Summarizes the proposed project and includes a summary outlining anticipated impacts and those measures that would be effective in reducing or eliminating potential adverse impacts, cumulative impacts, and any areas of controversy or issues to be resolved;

3. Project Description: Describes the history of the project and its objectives, and the planning and design modifications that have been proposed since EIR certification and antecedent SEIR preparation;

4. Environmental Impact Analysis: Discusses the existing environmental setting, potential environmental impacts anticipated to result from the construction and operation of the proposed planning and design modifications to the rail transit project, and recommended mitigation measures;

5. Significant Unavoidable Environmental Effects: Describes any potential significant adverse impacts that cannot be avoided resulting from the construction and/or operation of the proposed modifications to the project;

6. Long-Term Implications of the Proposed Project: Discusses the project's relationship between the local short-term uses of man's environment and the maintenance and enhancement of long-term productivity; discusses irreversible environmental changes that would be involved with the implementation of the proposed project;

7. Growth-Inducing Impacts: The manner in which the proposed project would generate growth-inducing impacts is discussed; and

8. List of Preparers and References: Those persons and agencies responsible for the preparation of the SEIR are identified as the agencies and individuals contacted in the course of its preparation.

4.10 CULTURAL RESOURCES

This section of the SEIR assesses proposed project impacts on prehistoric and historic resources in the project areas. Analyses will focus only on cultural resources which may be affected by the currently proposed modifications to the project, as outlined in Section 3.4, above.

4.10.1 Existing Setting

Area Prehistory. The archaeological record of the project area is known to span at least 10,000 years. The original Native Americans present in the region were most likely members of the Chumash tribe, who spoke a language of the Hokan linguistic family. Eventually, these peoples were replaced by Shoshonean-speaking members of the Gabrielino culture group. The Gabrielino built the village of Yangna, the remains of which have been identified near the current site of Union Station in Los Angeles (LACTC, 1992).

Area History. The rich historic cultural landscape which characterizes the project area is a reflection of the numerous groups which have visited and/or settled in the region through time. These groups include Spanish settlers and missionaries, agricultural colonists from Indiana, and wealthy settlers seeking health benefits from the pleasant climate (LACTC, 1992). Chinese immigrants were drawn to the area by work opportunities on the railroad, and evidence of an old Chinese settlement has been identified near Union Station in Los Angeles. The influx of people to the area supported economic and housing booms; much of the structural evidence of which is now incorporated into historic districts including the Old Pasadena Historic District which is listed on the National Register of Historic Places.

Numerous historically significant structures have been identified within the community of Highland Park. The Southwest Museum, Ziegler Estate, and Casa de Adobe have all been awarded monument status by the City of Los Angeles (Los Angeles County Transportation Commission, 1992), as outstanding examples of architecture types. A number of historically significant structures, based on City of Los Angeles criteria, including eight residences in the 4000 block of Marmion Way, have been identified in the vicinity of the proposed project (LACTC, 1992).

The Johnson & Johnson/Merck facility is being considered as a potential location for a Park and Ride facility. The main office and manufacturing facilities, swimming pool, and concrete wall at the front entrance to the facility were designed by Edward Durell Stone. Stone was an architect who worked primarily during the 1950s in industrial architecture. The portions of the Johnson & Johnson/Merck facility identified above are rare examples of the New Formalism style of architecture. Stone's work on the Johnson & Johnson/Merck facility earned him an award from the American Institute of Architects in 1958, the year of the facility's completion. Other buildings designed by Stone include the American Embassy in New Delhi, the Waldorf Astoria Hotel in New York City, the Museum of Modern Art in New York, and Busch Stadium in St. Louis, Missouri (Bickerstaff, 1993).

The portions of the Johnson & Johnson/Merck facility identified above are considered historically important because they are resources that embody the distinctive characteristics of a type, period, or method of construction, and represent the work of a master. The Johnson & Johnson/Merck

facility, originally designated the Stuart Company Plan and office building, has been formally nominated to the National Register of Historic Places by the Pasadena Heritage Commission.

The former site of the Builders Emporium retail store, two blocks south of the Johnson and Johnson/Merck facility, is also being considered for the Park and Ride facility. Based on a preliminary, visual assessment, the Builders Emporium facility, probably constructed during the 1970s, does not appear to be an historically important structure.

Cultural Resources Records Search. Three cultural resources records searches were requested by the Archaeological Information Center, UCLA Institute of Archaeology for 1) the proposed below-grade separation at Marmion Way and Figueroa Streets, 2) the proposed Midway Yard access road between the LADWP Buena Vista Pump Station and Midway Yard, and 3) the proposed temporary easements for construction activities directly beneath the Arroyo Seco Bridge in Arroyo Seco Park. Only the records search for the below-grade separation has been completed to date (UCLA, 1994). No prehistoric or historic sites have been identified within a one mile radius of the proposed below-grade site. The area was fully developed by 1896 with a dense street grid pattern and numerous structures. In addition, the National Register of Historic Places lists no properties, and there are no California Historical Landmarks, within a one-mile radius of the proposed below-grade site. However, buried prehistoric and/or historic archaeological resources could still be found at the proposed below-grade site.

The results of the cultural resources records searches for the proposed Midway Yard access road and the Arroyo Seco Bridge will be included in the Final SEIR. The Arroyo Seco Bridge was determined not to be eligible for listing in the National Register of Historic Places in January 1994 (SHPO, 1994). The potential does exist, however, for the presence of buried prehistoric and/or historic archaeological resources at the proposed access road and bridge construction sites.

4.10.2 Significance Criteria

Appendix G to the CEQA Guidelines defines a project as having a significant effect on the environment if it will:

> "Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group."

Appendix K to the CEQA Guidelines defines a site as an important archaeological resource if it can meet one or more of the following criteria:

a. Are associated with an event or person of either recognized significance in California or American history, or recognized scientific importance in prehistory;

b. Can provide information which is of demonstrable public interest as well as useful to addressing pertinent scientific research questions;

c. Have a special quality, such as most representative, oldest, or last surviving intact example;

d. Are at least 100 years old and maintain substantial physical integrity; and/or

e. Contain data pertinent to addressing research questions that can only be examined using archaeological methods.

4.10.3 Environmental Impacts

Buried Resources. Impacts to prehistoric resources which could potentially result from the implementation of the proposed modifications are most likely to result from ground disturbing activities during construction. In order to create the proposed below-grade separation, it would be necessary to excavate the track alignment from the French Street station to Avenue 42, a distance of approximately 3/4 mile. Buried prehistoric resources could occur in the project area which have not been previously identified. The maximum depth of the below-grade alternative in the vicinity of Marmion Way and Figueroa Street will be to 30 feet, a depth at which prehistoric resources could be detected, depending on the geology and sedimentary processes of the area through time.

Access road grading is expected to be less than 10 feet deep. Excavations required for reconstruction of the Arroyo Seco Bridge support foundations are expected to be approximately 10 feet deep. In addition, surface contaminated soil removal and replacement of uncontaminated soil under the Arroyo Seco Bridge may occur to a depth of approximately 2 feet. Prehistoric resources may be encountered during Midway Yard access road or Arroyo Seco Bridge foundation construction. However, prehistoric resources are less likely to be found at the access road or bridge sites than at the below-grade site due to site locations and the extent of excavation proposed at each.

In addition to buried prehistoric resources, buried historic resources could also potentially be impacted by the proposed below-grade alternative in the Marmion Way/Figueroa Street vicinity, the Midway Yard access road, and under the Arroyo Seco Bridge.

Historic Structures. Potential impacts of the proposed project on historic resources include:

- The destruction or alteration of historic resources;
- The isolation of an historic resource from the surrounding environment;
- The sale or transfer of an historic resource; and
- The introduction of visual and noise elements that disturb the integrity of the site setting which may contribute to the importance of the resource.

As proposed, changes to the Marmion Way alignment would entail additional property acquisition, including ten structures located on six parcels (and other parcels requiring minor curb cuts) to provide adequate emergency vehicle access between Avenues 51 and 59. The ten structures to be demolished on the six parcels include:

Address*	Structure Type
5123 Marmion Way	Residence, garage
5122 Marmion Way	Residence, garage
5215 Marmion Way	Residence
5419 Marmion Way	Residence
5518 Marmion Way	Residence, garage
5522 Marmion Way	Residence, garage

*All properties are located in Highland Park, California

The structures at 5123, 5518, and 5522 Marmion Way are early twentieth century Craftsman style residences and are historically important for their architecture. This assessment is confirmed in a Los Angeles Department of Planning survey which lists these structures as historic resources (MLFA/LHA, 1990).

If the Johnson and Johnson/Merck site is selected for the Park and Ride facility, all of the buildings and structures would be subject to demolition. Demolition of any structure at the site nominated for listing in the National Register of Historic Places (see Figure 3.3-7) would result in a significant adverse impact to a cultural resource.

As the Builders Emporium structure does not appear to be an historically important structure, demolition and/or renovation of this facility would not pose adverse impacts to cultural resources.

4.10.4 Impacts Mitigated to Insignificance by Existing Regulations

Archaeological and architectural resources are protected by a variety of laws and their implementing regulations. The most important of these are the National Historic Preservation Act of 1966 and its 1980 amendments; the Archeological and Historic Preservation Act of 1974; and the Archaeological Resources Protection Act of 1979 (ARPA). Sites and areas of religious or heritage significance to Native Americans are addressed by ARPA; the American Indian Religious Freedom Act of 1978 (AIRFA); and the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA). Treatment of archaeological, architectural and traditional resources is further guided by the Advisory Council on Historic Preservation (ACHP) regulations, Protection of Historic Properties (36CFR 800).

According to the implementation regulations for the National Historic Preservation Act (NHPA), consultation with the State Historic Preservation Office (SHPO) is required at several points in the Section 106 process. The SHPO should be notified in order to assess the initial data needs of an undertaking, to evaluate the NRHP eligibility recommendations of sites, to determine effects of an undertaking, and to negotiate appropriate mitigation measures. Consultation with Native American groups and other interested parties such as local historical societies, local governments, or private individuals should also be conducted as required.

4.10.5 Mitigation Measures

Buried Resources. In order to mitigate potential impacts to buried cultural resources to a non-significant level, archaeological personnel should be present to monitor construction activities and all excavation connected with the below-grade separation, Midway Yard access road, and Arroyo Seco Bridge support foundation excavation.

CEQA Appendix K provides guidelines which can be used to preserve or salvage artifacts or human remains, including the temporary cessation of construction/excavation activities while cultural resource salvage strategies are implemented. An archaeological monitor present on the construction site would ensure the timely execution of any necessary salvage activities which could arise as a result of identification of buried cultural resources (see Construction Monitoring, below).

Historic Structures. A determination of the potential historical importance of the properties along Marmion Way, as discussed above, including date of construction, subsequent improvements and/or alterations, and photo documentation, is one alternative to mitigate adverse impacts.

Historically important structures at the Johnson and Johnson/Merck facility have been nominated for listing in the National Register of Historic Places. The historically important structures must be considered as if they had been determined to be eligible for listing, or as if they had been listed, in the National Register of Historic Places. This conservative approach is required until a final determination is made by SHPO regarding the status of the historically important structures.

The demolition of any structures at the facility that are nominated for listing in the National Register of Historic Places would be considered a significant adverse impact to cultural resources and would require a detailed mitigation plan. A mitigation plan should be prepared in consultation with the National Park Service, reviewed and approved by SHPO, and implemented prior to any demolition at the Johnson and Johnson/Merck site. If historic structures at the site become listed on the National Register of Historic Places, documentation according to the Historic American Buildings Survey (HABS) standards will be required. HABS documentation consists of measured drawings, view camera (large format) photographs, and written data that provide a detailed record that reflects a property's significance. For mitigation documentation projects, the appropriate level of documentation is selected by the National Park Service Regional Office.

Specifications for documentation are detailed and, upon submission, the documentation is rigorously evaluated against these specifications. All documentation must meet archival standards of a 200-year life. Requirements for mitigation documentation include:

- View camera (large-format) photographs must be taken of each exterior elevation, each corner of the structure (showing two elevations), all exterior architectural details (close ups), interior rooms, and interior details (close ups). Long shots of the streetscape on each side of the building and on both sides of the street must be included to place the building in its proper perspective.

- View camera photography must be conducted when the weather is clear, there are no deep shadows on the building, and obstructions such as parked cars are removed. Appropriate filters for outdoor conditions must be used.

- Large-format photographs must be in black and white and may be 4 by 5, 5 by 7, or 8 by 10 inches.

- Film that is 400 ASA is not permitted; 100 or 200 ASA sheet film (safety film) must be used and the negatives submitted untrimmed so that the identifying ASA grooves remain on the negatives.

- The large-format negatives and photographs must be archivally processed and will be tested for the level of fixer.

- Documentation (i.e., large-format view camera) photographs must include duplicate photographs that include a scale.

- Standard photographic paper must be used; resin-coated photographic paper is not permitted.

- All negatives must be submitted inside archival negative sleeves.

- Negative sleeves must be labeled in a specific manner with acid-free ink.

- A full set of measured drawings must be prepared by an historic architect. Measured drawings will depict existing conditions through the use of a site plan, floor plans, elevations, sections and construction details.

- Measured drawings must be in India ink on Mylar, either 10 by 24 or 24 by 36 inches.

- Measured drawings must be lettered mechanically or handprinted in a "Leroy," or similar, style.

- Extensive historical research is required to document the building's history, architect, and unique architectural aspects, including oral interviews as well as archival and library sources.

- Any oral history interviews must be recorded on metallic tape and must be accompanied by consent forms executed by the interviewees.

- An historian and/or architectural historian must prepare the report section of the documentation.

- The report must be on bond paper and must be printed in carbon ribbon (xerographic copies are not archival).

- Other media than those specified may be included in the documentation, such as movie footage of the building at an earlier time, but they must be in addition to the required measured drawings, large-format photographs and written data.

Construction Monitoring. A cultural resources monitoring plan should be prepared to establish general procedures during construction. The plan should include specific authorities and responsibilities of the on-site archaeologist, resident engineer, and construction manager; specific procedures for the protection of cultural resources prior to evaluation and consultation; specific procedures for temporary work stoppage; and specific procedures for archaeological documentation and report preparation. A specific clause should be placed in the construction contract that details the process of cultural resources monitoring and the procedures for protecting and evaluating unanticipated archaeological resources.

In general, the procedure to be followed during construction monitoring is straightforward and involves the construction contractor, the on-site engineer, LACMTA personnel, and the qualified professional archaeologists (construction monitors). Any construction and excavation activities affecting cultural properties will cease upon the discovery of such properties and notification be given immediately to the engineer. Following notification, the monitors will take actions to evaluate the discovery and, within 24 hours, provide guidance to the engineers on any actions that should be taken to provide appropriate management treatment of the resource. These findings and recommendations, which will be provided to LACMTA in time to respond to the engineer within a 24-hour period, may lead to the following actions:

- Cessation of activity at the location where artifacts have been identified for an undetermined period of time pending completion of mitigation;
- Change order to redirect construction activity or alter it to avoid impact;
- Extension of 24-hour cessation for a specified period of time to allow for data recovery;
- Extension of 24-hour work cessation for a specified period of time to allow for consultation with the SHPO;
- Data recovery within the 24-hour cessation; and/or
- Resumption of construction or excavation.

From both strategic and tactical standpoints, the most critical aspects of instituting an efficient and effective monitoring program are the procedures to be followed once cultural materials are identified during construction. Caution must be exercised during monitoring efforts to insure that work stoppages do not occur except when absolutely warranted. It is anticipated that ground-disturbing activities related to construction commonly will encounter isolated artifacts or modern debris. In order to facilitate completion of construction or excavation in a timely fashion, construction monitors will be instructed not to recommend work stoppages in such circumstances. Instead, a stop work order will be reserved for situations in which artifact concentrations and potentially important cultural features (e.g., burials, building foundations) are encountered.

For those resources identified during construction that have the potential for meeting NRHP eligibility criteria (as outlined in 36 CFR 60.4), evaluative efforts will be undertaken. For those resources determined to be NRPH-elgible, a mitigation plan will be developed in consultation with

SHPO to minimize or avoid further impacts. In those instances where emergency data recovery measures are recommended, every effort will be made to accomplish study objectives within the shortest time frame possible and within the spatial confines of areas subject to construction-related disturbance.

4.10.6 Significance of Impacts After Mitigation

Implementation of the mitigation measures described above would reduce the impacts to a non-significant level.

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Final
Supplemental Environmental Impact Report
Pasadena-Los Angeles Light Rail Transit Project

243 pgs
13 management plan/EIR
no sites
? miles
11 general Public works
Agency: Los Angeles County Metropolitan Transportation Authority



1103 - Los Angeles
1102 - Pasadena
1101 - Mt. Wilson

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SHC# 93121099
Contract ENO-26
CWO No. -002
May 1994 date

Prepared By:

from Author

TETRA TECH, INC.
PASADENA, CALIFORNIA

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LACMTA/RCC

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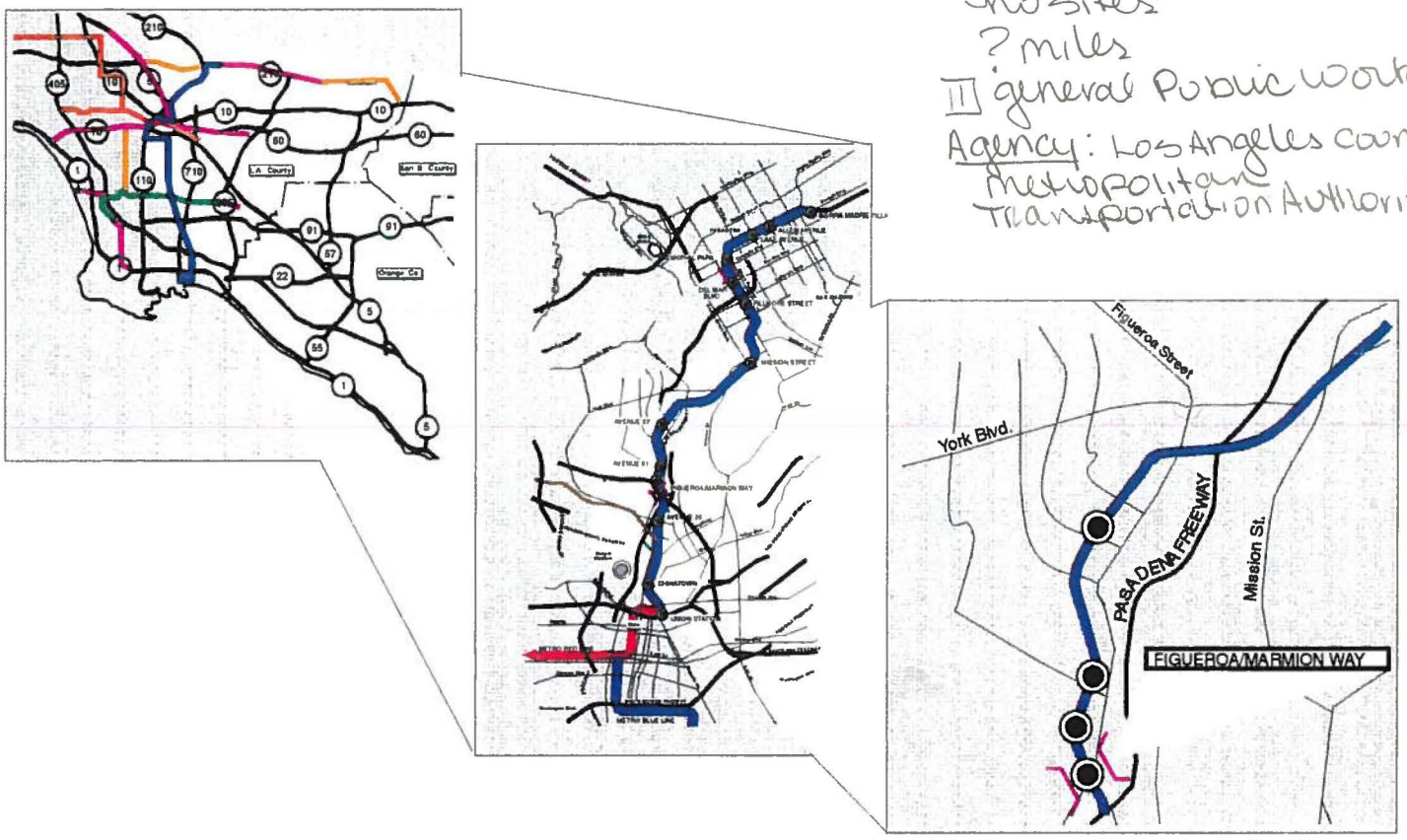

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SECTION 1.0
INTRODUCTION

1.1 CONTENTS OF FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

This Final Supplemental Environmental Impact Report (FSEIR) for the Pasadena-Los Angeles Light Rail Transit (LRT) Project presents the comments received during the public circulation period for the Draft Supplemental Environmental Impact Report (DSEIR) and the Los Angeles County Metropolitan Transportation Authority's (LACMTA) responses to those comments. Also included in this FSEIR are any corrections or additions to the contents of the DSEIR necessitated by public and agency comments, and/or by project refinements. The comments, responses to the comments, and additions and corrections are included in Section 2 of this FSEIR.

Section 3 includes copies of the written comments as received by the LACMTA, and copies of the transcripts of the two public meetings held on April 13 and 20, 1994, at the Franklin High School Auditorium in Highland Park and the Pasadena Hastings Branch Library in Pasadena, respectively.

The DSEIR is incorporated herein by reference as part of this FSEIR. For further information on this FSEIR or to obtain a copy of the DSEIR, contact:

Harley S. Martin, Environmental Specialist
Los Angeles County Metropolitan Transportation Authority
818 West Seventh Street
Los Angeles, California 90017
(213) 244-6848

1.2 PROJECT SUMMARY

This SEIR for the proposed Pasadena - Los Angeles LRT Project analyzes the potential environmental effects that may result from the approval of a second set of planning and design modifications to the project as specified in the antecedent EIR [State Clearinghouse Nos. 88042713 (Revised Draft, LACTC, 1989) and 89082327 (Final, LACTC, 1990)] and first SEIR (State Clearinghouse No. 92071005, LACTC, 1992).

The LACTC expects to accomplish the following objectives through this transit project:

- To provide the citizens in the Pasadena-Los Angeles Corridor with a safe and efficient light rail transit system;
- To alleviate overcrowding and traffic congestion on local freeways that presently serve the region extending from Pasadena/West San Gabriel Valley to downtown Los Angeles;
- To improve transportation mobility in the Pasadena-Los Angeles Corridor;

- To connect Pasadena and the San Gabriel Valley with the regional transportation network consisting of Metro Rail, light rail, and busway facilities;

- To improve regional air quality through the reduction of vehicle trips and roadway congestion; and

- To construct this project and the other projects as expeditiously and cost-effectively as possible.

The location of the proposed project is along the existing railroad right-of-way between Union Station in Los Angeles and the intersection of Sierra Madre Villa Avenue and the Foothill (210) Freeway in Pasadena [see Figures 2.1-1 and 2.1-2 in DSEIR (LACMTA, 1994b.)] The proposed action consists of issues affecting the LRT alignment in the following five areas: (1) along Marmion Way in Mount Washington; (2) in the vicinity of Marmion Way and Figueroa Street in Highland Park; (3) in the vicinity of Arroyo Seco Park in Highland Park; (4) in South Pasadena; and (5) in the vicinity of Sierra Madre Villa in east Pasadena.

The types of planning and design modifications proposed include the following improvements:

(a) a change from street-running to semi-exclusive train operation along Marmion Way in Mount Washington and Highland Park;

(b) additional street closures in Highland Park;

(c) additional property acquisition to provide adequate emergency vehicle access to streets along Marmion Way between Avenues 51 and 59;

(d) additional property acquisition (three parcels in Arroyo Seco Park) to provide temporary easements for Arroyo Seco Bridge renovation activities;

(e) additional property acquisition (one parcel in Elysian Park) for construction of an access road between the LADWP Buena Vista Pump Station and Midway Yard [formerly an Atchison, Topeka and Santa Fe (AT&SF) switchyard];

(f) sound barrier wall modifications along Marmion Way in Mount Washington and Highland Park, and in South Pasadena;

(g) a below-grade separation option in the vicinity of Marmion Way and Figueroa Street in Mount Washington, including closure of French Avenue; and

(h) a change in alternative locations for a Park and Ride facility located at Madre Street/Sierra Madre Villa and the Foothill Freeway in east Pasadena, including two additional parcel acquisitions for the Johnson & Johnson/Merck alternative.

1.2.1 Environmental Effects And Mitigation Measures

This SEIR focuses on the following environmental resources/issues: earth resources, air quality, water resources (groundwater), noise and vibration, risk of upset, housing, transportation/circulation, public services, human health, and cultural resources.

A complete environmental impact analysis, including environmental setting, environmental impacts, mitigation measures, and significance of impacts after mitigation for each CEQA topic is provided in Section 4.0 of the DSEIR (LACMTA, 1994b), incorporated herein by reference.

The results of the various investigations indicate that the environmental issues resulting in potentially significant impacts that require mitigation are noise and vibration, transportation/circulation, and cultural resources.

1.2.2 Cumulative Impacts

Under CEQA [PRC, 21083 (b)], the Pasadena - Los Angeles Rail Transit Project EIR (LACTC, 1990) concluded that it would have a significant effect on the environment if, "possible effects of a project are individually limited but cumulatively considerable...when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

Under CEQA Guidelines (CAA, Section 15130), the project EIR considered the following four factors: (a) definition of relevant area affected; (b) consideration of all sources of related impacts; (c) quantification of cumulative impacts, where appropriate; and (d) focused evaluation of significant impacts. The analysis was performed and subsequently accepted as part of the EIR Certification process. This was also the case for the first set of planning and design modifications studied in the antecedent SEIR.

The second set of planning and design modifications evaluated in this SEIR does not alter any of the previously conducted analyses or change their respective findings regarding cumulative impacts. The planning and design modifications proposed in the second SEIR in and of themselves are not affected by any past projects, other current projects, or known probable future projects. Nevertheless, the project as described in this SEIR and prior CEQA documentation is designed such that there will be an opportunity to establish an interface with Metrolink as part of its proposed Northern San Gabriel-San Bernardino Valley (NSG-SBV) Rail Transit Corridor Project. The proposed NSG-SBV Rail Transit Corridor Project would be located within the AT&SF Pasadena Subdivision right-of-way from the terminus of the LRT alignment at Sierra Madre Villa Avenue in Pasadena to Montclair's Transcenter in San Bernardino County. This proposed rail transit project forms a part of the larger regional transit system that would link major activity centers within these cities with Metro Rail service in downtown Los Angeles and points beyond.

1.2.3 Identified Areas Of Controversy And Issues To Be Resolved

The subject second set of planning and design modifications evaluated in this SEIR present no areas of controversy and/or issues to be resolved.

SECTION 2.0
RESPONSES TO COMMENTS

2.1 INTRODUCTION

Section 2 presents a record of the substantive comments received on the DSEIR. Both written comments received during circulation of the document and oral testimony provided at the public meetings have been included. The public review period for the DSEIR commenced on March 25, 1994 and ended on May 9, 1994. Public hearings were held at the Franklin High School Auditorium in Highland Park, the City of Los Angeles (820 N. Avenue 54) on April 13, 1994, and the Pasadena Hastings Branch Library in Pasadena, the County of Los Angeles (3325 E. Orange Grove Boulevard) on April 20, 1994.

During the course of the public review period, 15 comment letters were received: 5 from public agencies; 15 from business; 4 from private organizations; and 1 from an individual representing the private sector. Two letters were received from the City of Los Angeles Bureau of Engineering, and six letters/memoranda were received from the City of Pasadena. They were counted as one submittal each. Some of the letters received raised a single issue and others contained multiple comments or questions. All of the letters submitted supported the LRT Project, but comments addressed potential project impacts and proposed mitigation measures.

At the two public meetings, 10 speakers testified before the hearing officer, an LACMTA official. Some of the speakers duplicated comments which were expressed previously or were also submitted in written form. All speakers expressed support for the project.

All written and oral comments have been organized by comment letter and by public hearing date. The comments are presented below with an appropriate response for each. Comments were edited to eliminate unnecessary text and for clarification of the contents. Consequently, they may not represent complete quotations from the comment letters or testimony provided during the public review period. The editing was done solely for the purpose of reducing unnecessary text, with no intent of obscuring any comment or testimony received. Copies of the written comments submitted during the public review/comment period and the testimony received at the public meetings are included in Section 3.

2.2 COMMENTS AND RESPONSES

2.2.1 Oral Comments Presented at Public Hearings

2.2.1.1 Public Hearing Held April 13, 1994

Comment 2.2.1.1-1:

"I request that a concept wall site plan of the grade separation at Marmion and Figueroa be included in the Supplemental Environmental Impact Report prior to its certification." (David Kuehn, Los Angeles, Public Hearing 4/13/94)

Response 2.2.1.1-1:

See Figure 2-1 in Section 2.3.

Comment 2.2.1.1-2:

"Instead [of] an underpass at Figueroa Street/Marmion Way, there should be [an] aerial flyway which would free up additional money to speed up the construction of the Pasadena Blue Line." (Pat Moser, Southern California Transit Advocates, Public Hearing 4/13/94)

Response 2.2.1.1-2:

An above-grade separation at Marmion Way and Figueroa Street was analyzed in the first SEIR (LACTC, 1992.) In response to the adverse community reaction to unavoidable visual impacts from the above-grade separation, a below-grade separation was analyzed in the subject SEIR (LACMTA, 1994a.) The below-grade separation is the environmentally-preferred alternative. CEQA requires that environmental analyses be performed irrespective of fiscal impacts.

Comment 2.2.1.1-3:

"...when construction workers start on that underpass, where are they going to park? What time they going to start? What time they going to stop? Who is the contact person in case we got any complaints? And machinery, how much impact is that going to have on all that block in there?" (Victor Arredondo, Los Angeles, Public Hearing 4/13/94)

Response 2.2.1.1-3:

Worker parking will be provided along the existing railroad right-of-way, to the maximum extent possible, during construction of the below-grade separation. Section 2.8.9, Construction Noise and Vibration Control, of the LACMTA Systemwide Criteria is presented below in Section 2.3. The criteria include noise level limitations for both daytime and nighttime to ensure that noise levels within 200 feet of the construction limits and beyond will not exceed Federal, State and local limitations. Daytime is defined as from 7:00 AM to 7:00 PM. Construction starting and

stopping times will vary slightly from these times. Construction during the night would require written permission from the board of police commissioners as provided in the Los Angeles Code Section 41.40(b). The criteria also include measures to mitigate adverse noise impacts generated from construction machinery and vehicles. The contact person at LACMTA who is responsible for enforcing noise and other mitigation measures for the LRT Project is Mr. Harley Martin, Environmental Specialist, 818 West Seventh Street, Los Angeles, California 90017. Mr. Martin may be contacted at (213) 244-6848.

Comment 2.2.1.1-4:

"The new light rail apparently is going to take the alley or right of way next to six garages, and I will no longer have access to these garages or any way to provide parking for the six houses next to them...I believe that those garages will have to be torn down. You'll have to pave an area to provide off-street parking for these tenants...that 10 foot wide right-of-way is going to be almost like a loss of property to me for future building because I will not be able to use the corner or the side of the alley which will be blocked." (Robert Argott, Los Angeles, Public Hearing 4/13/94)

Response 2.2.1.1-4:

LACMTA has determined that the right-of-way of the subject property is owned by the LACMTA; tenants presently use LACMTA right-of-way to access the garages.

Comment 2.2.1.1-5:

"Regarding the parcel descriptions that are in the environmental impact report of Plots PA 248 and 249, there is a misrepresentation of the alley width. It's not 10 foot as proposed or expressed, and according to your own maps it's 15 foot, according to the Public Works maps." (Joanne Barker, Los Angeles, Public Hearing 4/13/94)

Response 2.2.1.1-5:

Comment noted; 15 feet is correct.

Comment 2.2.1.1-6:

"...could you please tell me why it's taken from 1988 until now to discuss the fire department accessibility or any public service accessibility?" (Joanne Barker, Los Angeles, Public Hearing 4/13/94)

Response 2.2.1.1-6:

When the project EIR (LACTC, 1990) was written, street running was the proposed light rail operational scenario. Under the street running scenario, LRT vehicles would have operated at the same speeds posted for other vehicular traffic operating on Marmion Way. LRT vehicles, cars,

and pedestrians would have been controlled by traffic signals where the right-of-way intersects local streets. Turning movement difficulties were not identified until prior to final design.

To increase public safety and for other operational benefits, semi-exclusive operation was proposed and was evaluated in the subject SEIR (LACMTA, 1994a.) Semi-exclusive running includes train speeds greater than for street running (up to 35 miles per hour) and would require street closures (also addressed in the SEIR). Closure of the streets and full use of the right-of-way made it impossible for emergency vehicles to negotiate the turns along the connector roads between each pair of closed streets. Emergency vehicles would presently encroach onto the railroad right-of-way to negotiate turns. Therefore, curb cuts and property acquisitions are required to widen the connector roads for emergency vehicle access.

Comment 2.2.1.1-7:

"...we constantly talk about relocation of residents and the demolition of structures, and some of the structures are not historic and some...are historic, but what I would rather hear them say is a relocation of residents and a relocation of historic structures...Of particular interest to us is 5323, a brown bungalow structure which I'm trying to relocate in Echo Haze area if possible. And several houses that were taken in the initial EIR, which aren't addressed under the SEIR I think at 5030 Marmion and 130 and 144 Avenue 51 should be looked at for relocation. And we would work with the counsel offices and with MTA to find appropriate locations for those relocations...I must -- we must take exception to the taking of 5318 and 5 -- 5518 and 5520 Marmion Way, two very historic homes, to make way for what you say the fire department needs for a major U-turn ability. I wish we could find some other ways to mitigate that by finding out whether the fire department could take other avenues rather than destroying those two homes...I understand that some of the homeowners that were supposedly contacted and accepted and were interested in it actually were not contacted and are not interested in being bought out and relocated.." (Robert Evinger, Highland Park Heritage Trust, Public Hearing 4/13/94)

Response 2.2.1.1-7:

LACMTA would be willing to consider participation, up to the cost of building demolition, in the relocation of historically-significant buildings to appropriate locations determined by the Highland Park Heritage Trust.

The curb cuts and property takes addressed in the SEIR (LACMTA, 1994a) were determined to be the alternative providing the most efficient and safest emergency vehicle access to streets that are proposed for closure. However, LACMTA would be willing to discuss any other alternatives proposed by the Highland Park Heritage Trust and/or the Los Angeles Fire Department. The LACMTA will evaluate alternatives to taking the two homes (5518 and 5520 Marmion Way).

LACMTA has notified all owners of properties that would be affected by the modifications to the LRT Project as addressed in the SEIR (LACMTA, 1994a.)

Comment 2.2.1.1-8:

"We do have questions again regarding some of the takings and of course the relocation. Mr. Evinger spoke about this, and so did Miss Barker over at 5518. Those two in particular we are very concerned about because they are both historic homes...The other -- there is a third alley that goes through that block and bisects it. Our feeling is that there is plenty of access to that particular block, and that block has much more access than most blocks do in the Highland Park area. We don't feel that the taking of these two houses is anywhere necessary...The other ones in particular I just want to remind the MTA about the Avenue 61 power substation, that we are asking that the possibility of relocating that station to beside a portion of Avenue 61, the industrial property that is located next door...this property has been vacated by almost three years now and deteriorating." (Charlie Fisher, Chairman, Highland Park Neighborhood Association, Public Hearing 4/13/94)

Response 2.2.1.1-8:

Please refer to Response 2.2.3-4, above. The Avenue 61 power substation has been addressed in previous CEQA documentation for the project (LACTC, 1990 and 1992.) However, your reminder has been noted.

Comment 2.2.1.1-9:

"...one, to my surprise, I ordered the EIR report, and I did notice our address up there, which is the first I've ever seen...I've never been notified of anything or any interest to our property. Secondary, I'm opposing the closure of Avenue 53. My main concern is the crime problem on Avenue 53 and Monte Vista...I don't see where it would speed up the train any more by maybe a fraction of a second or so I can't imagine." (Rose Xochiaua, Los Angeles, Public Hearing 4/13/94)

Response 2.2.1.1-9:

LACMTA has notified all owners of properties that would be affected by the modifications to the LRT Project as addressed in the SEIR (LACMTA, 1994a.)

When Avenue 53 is closed, alternate access will still be readily available from adjacent local residential streets, and no arterial or secondary streets will be closed as a result of the proposed project. The affect of the closure of Avenue 53 on crime in the vicinity of Monte Vista should not be significant.

Please see DSEIR Section 4.8, Public Services and Safety (LACMTA, 1994b) for further information regarding security, police service, and public safety.

Comment 2.2.1.1-10:

"There will be skirts on the trains...When you build the sound walls, they do not have to cover the trains. They can go all the way up to the windows so there's no need for you to use sound walls...In addition,...each car will have digital horns which will mitigate the loud noise as the train approaches a grade crossing." (Pat Moser, Southern California Transit Advocates, Public Hearing 4/13/94)

Response 2.2.1.1-10:

LACMTA's noise analysis in the SEIR (LACMTA, 1994a) indicates the need for sound barrier walls to mitigate adverse impacts. However, the analysis indicates that, in some places, the walls need not be as high as proposed in the FEIR and first SEIR (LACTC, 1990 and 1992, respectively.) Please see DSEIR Section 4.4.5.1 for a discussions of sound barrier walls (LACMTA, 1994b.)

The use of audible warning devices on LRT vehicles is addressed in DSEIR Section 4.4.5.1 (LACMTA, 1994b.)

Comment 2.2.1.1-11:

"There will be no adverse impacts on bus service." (Pat Moser, Southern California Transit Advocates, Public Hearing 4/13/94)

Response 2.2.1.1-11:

Comment noted.

2.2.1.2 Public Hearing Held April 20, 1994

Comment 2.2.1.2-1:

"...we feel that we want to be on record that this supplemental only expresses one view, and that's of the traffic patterns if the light rail and when the light rail goes in. It does not express traffic patterns of the PCC Skill Center or what's going to be developed on the property; therefore, we feel even though officially it's a correct document, unofficially it's flawed because we still have other documents to take into consideration." (Timothy Price, Daisyville Home Owners Association, Public Hearing 4/20/94)

Response 2.2.1.2-1:

The EIR for the proposed LRT Project, including a Park and Ride station in east Pasadena near the Foothill (210) Freeway and Sierra Madre Villa Avenue, was approved in 1990. The transportation/circulation analysis in this FSEIR (including the DSEIR incorporated by reference) pertains to alternate locations for the previously-approved Park and Ride facility. Potential

cumulative transportation/circulation impacts resulting from the addition of the Pasadena City College (PCC) Skill Center should be addressed in the CEQA documents prepared for that project.

Comment 2.2.1.2-2:

"...these traffic reports indicate...that we were going to have significant traffic impacts at four major locations in our east end of Pasadena...Level "F" mitigated is not acceptable..."E" is bad enough when you get occasional delays, but "F" is grid lock, and I think something has to be done further in the way of mitigation to look at what alternatives can be made in order to alleviate that traffic problem.

"You looked at [CO] emissions, and...by your own standards there are times when you are you barely, barely within the maximum acceptable level of [CO] emissions in an eight-hour period, 8.8 parts per million, when the maximum is 9...I would almost challenge you to give us the detailed analysis of how that was calculated because I could think that you could slip over the other side of 9 just as easily as you could slip under 9 knowing what the level is.

"I acquired a copy, albeit it was done by I guess some staff engineer, that gave proposed layout for the Johnson & Johnson site. Here it is. It says the construction of the Park and Ride facility would be constructed at the proposed Johnson and Johnson work site or at the alternate Builder's Emporium site. At either site, proposed three story structure would be constructed with two and a half levels for the parking of a few cars and a half level of grade for bus loading, unloading and layover. This drawing -- and it's undated -- proposed a thousand car park encompassing everything from Sierra Madre Villa to Halstead, taking away a property that does not belong to Johnson & Johnson...all through the discussions of this development of the Sierra Madre terminal ... we talked about having multiple story park facilities provided that would also then provide room for businesses to de developed that would be compatible to the type of business that you would associate with egress and so forth from a station. If you cover the whole darn thing with parking lot, that won't leave any room to do that." (Ciff Benedict, Public Hearing 4/20/94)

Response 2.2.1.2-2:

The determination of significant impacts to transportation/circulation and the effectiveness of mitigation measures can be expresses in a simplified manner as a two-step process:

1. To determine project impacts, levels of service (LoS) for impacted intersections prior to mitigations (unmitigated LoS) are compared to traffic volumes projected to the year 2010 that include growth in ambient traffic plus traffic from other developments (cumulative LoS); then

2. To determine the effectiveness of mitigation measures proposed for the project, LoS' calculated assuming traffic reductions from implementation of mitigation measures (mitigated LoS) are compared to cumulative LoS values.

Using this procedure as required by CEQA, no significantly impacted intersection was increased to LoS "E" or "F" after allowing for proposed mitigations. Comparing cumulative LoS to mitigated LoS, two intersections would remain at level "E," one would remain at level "F," and two would be reduced from level "F" to "E" as a result of the mitigation measures proposed in the DSEIR [see Table 4.7-3 (LACMTA, 1994b)]. Those intersections projected to be at LoS "E" or "F" were the result of ambient and cumulative traffic projections and were not exacerbated by project-related traffic. Therefore, according to CEQA Guidelines, no significant impacts would occur as a result of mitigated project-generated traffic.

The CO emission rate of 8.8 ppm was a conservative calculation based on a worst-case scenario. The actual CO emission rate for the Sierra Madre Villa Park and Ride Facility is expected to be less than 8.8 ppm, in spite of variability in anticipated traffic. Therefore, it is unlikely that the 9.0 ppm would be exceeded. Air emission calculations have been included in Section 2.3, below.

The revised drawing for the Johnson & Johnson/Merck Park and Ride facility is presented in Figure 2-2 in Section 2.3, below. It is proposed to take all of the structures located between Foothill Boulevard to the north, the Foothill (210) Freeway to the south, Sierra Madre Villa Avenue to the west, and Halstead Street to the east, with the exception of the Southern California Edison Company substation on Sierra Madre Villa Avenue and the Foothill Freeway. Parking for 1,000 vehicles would be provided. The project includes an alternative to construct a three-level parking structure with compatible businesses if there is private sector interest to do so.

2.2.2 Comments Submitted in Writing

2.2.2.1 Letter 1 from Robert S. Horii, City of Los Angeles, Bureau of Engineering; May 9, 1994

Comment 2.2.2.1-1:

"The relocation of sanitary sewer at Marmion Way and Figueroa Street will have significant impacts on neighborhood traffic circulation, parking and private driveway access along the proposed route. This relocation route will include portions of Pasadena Avenue, French Avenue, Marmion Way, Loreto Street and Figuero Street (see attached plan). Due to the magnitude of these impacts, the Mitigation Measures of the original EIR are inadequate and need to be augmented in the SEIR."

Response 2.2.2.1-1:

The LACMTA is committed to provide mitigation measures recommended in the original EIR, the first SEIR, and this second SEIR. The LACMTA maintains that these measures are adequate to mitigate potential impacts to the city sewer system and local circulation. The "Worksite Traffic Control Plan," as required by the Los Angeles Department of Transportation (LADOT), will help mitigate potential impacts to local circulation, such as curb cuts, and parking that might be caused by project-related construction.

It should be noted that utility upgrades and relocations are common in the urbanized Los Angeles area, and the City of Los Angeles (City) has detailed procedures established for private developers and public agencies to construct such improvements with minimal impact to local businesses, residents, drivers, and pedestrians. All sewer relocations and traffic plans will be processed in accordance with local permit procedures, which will effectively mitigate potential impacts to local communities (See Table 1.1-1 in DSEIR).

Comment 2.2.2.1-2:

"The SEIR mitigation of impacts to Marmion Way between Avenues 50-58 are inadequate. Mitigation Measures should include all improvements shown on the 85% Submittal Drawings for the Arroyo Seco to Los Angeles River - C6420 Contract."

Response 2.2.2.1-2:

The LACMTA is committed to providing safe emergency and local access to the areas to be improved. However, the improvements referred to by the City and outlined in Contract C6420 are considered "betterments." The City is essentially requesting LACMTA to rebuild an historically substandard portion of Marmion Way. The LACMTA will meet fire and safety requirements with its planned street improvements, but the additional improvements requested by the City are not necessary nor required as a direct result or impact of the proposed project.

2.2.2.2 Letter 2 from Robert S. Horii, City of Los Angeles, Bureau of Engineering; May 9, 1994

Comment 2.2.2.2-1:

"The DSEIR did not include a discussion of the impacts associated with the relocation of 14-, 18-, and 24-inch city trunk sewers in conjunction with the Figueroa Street at Marmion Way grade separation."

Response 2.2.2.2-1:

These improvements were generally identified in Table 1.1-1. However, CEQA does not require a strict accounting of every planned utility relocation or improvement as long as their general impacts are identified. This is especially true of "standard" projects such as utilities that must be relocated or realigned as the result of new construction projects. Mitigation measures for utility relocation were adopted for the Final EIR, and no conditions have changed to warrant modification of the adopted measures.

Comment 2.2.2.2-2:

"The DSEIR should include an analysis of additional impacts on traffic and the surrounding areas that would be associated with street vacations and utility relocations."

Response 2.2.2.2-2:

Traffic impacts associated with utility relocations will be minimal and temporary. "Worksite Traffic Control Plans" will be prepared for each construction site to identify and alleviate specific circulation impacts. These plans will be reviewed and approved by LADOT. (Also see Table 1.1-1 in DSEIR.)

The long-term traffic changes that will occur as a result of the various proposed street closures (vacations) are outlined in the traffic analysis of the SEIR. None of the traffic impacts at any of these locations were considered to be significant after implementation of recommended mitigation measures.

Comment 2.2.2.2-3:

"Construction sites five or more acres in size require a stormwater permit if construction activities disturb soils."

Response 2.2.2.2-3:

The LACMTA is aware of the stormwater NPDES permit requirements and will, along with the appropriate contractor, apply for such permits if needed.

Comment 2.2.2.2-4:

"Plans for the Southwest Museum station and child care center should be coordinated."

Response 2.2.2.2-4:

The LACMTA is presently coordinating the plans for these two facilities, and coordination will continue until construction of the planned improvements are complete.

2.2.2.3 Letter from Nancy Key, City of Pasadena, Zoning and Subdivision Administration; May 9, 1994

Comment 2.2.2.31:

"Comments on this document are directed primarily towards the impacts of the proposed 1,000 car park and ride facility in East Pasadena at either the Johnson and Johnson site or the former Builder's Emporium.

"Since the project's impact on historical/cultural resources is a primary environmental impact affecting the City of Pasadena, as a preliminary to my comments portions of AB 2881 which became effective January 1, 1993 are quoted. AB 2881 addresses historical resources and the California Environmental Quality Act (CEQA). The 2nd Draft SEIR is inadequate because it does not consider alternatives at the Johnson and Johnson site to demolishing the structure.

"Section 5021.1 of the Public Resources Code

(j) 'Historical resource' includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, limitary, or cultural annals of California.

"Section 21084.1 of the Public Resources Code with emphasis added.

A project that may cause a substantial adverse change in the significance of an historical resource, is a project that may have a significant effect on the environment. For purposes of this section, an historic resource is a resource listed, in or determined to be eligible for listing in, the California register of Historic Resources, historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant [to] criteria set forth in (g) of Section 5024.1, are presumed to be historically or culturally significant for the purposes of this section, unless the preponderance of evidence demonstrates that the resource is not historically or culturally significant. The fact that the resource is not listed in or determined to be eligible for listing in, the California Register of Historic Resources, not included in the local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5042.1 shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of this section."

Response 2.2.2.3-1:

The LACMTA acknowledges the definitions of historical resources and recognizes the authority of the City of Pasadena under CEQA regarding cultural resource designation.

Comment 2.2.2.3-2:

"The project Description is inadequate as it does not describe the existing landscaping of the current site nor the layout, ingress, egress, and landscaping of the proposed park and ride facility at the Johnson and Johnson site. Further there is no discussion of a parking structure at the Builder's emporium site. This site is much smaller than the Johnson and Johnson site and probably could not accommodate 1,000 surface parking spaces. The project description does mention that the park and ride facility will be lighted at night but mentions no shielding of light to prevent spillover on adjacent properties. There is also no discussion of how commuters would get from their cars to the station."

Response 2.2.2.3-2:

The project description necessarily describes aspects of the proposed project. A description of the historical aspects of the Johnson & Johnson/Merck site are included in the Cultural Resources section in DSEIR Chapter 4, as required by CEQA. General project alternatives were addressed in the antecedent EIR. It should be noted that the Johnson & Johnson/Merck and Builders

Emporium alternative park and ride sites were included in this SEIR at the request of the City of Pasadena. It should be further noted that the project description does not exclude the consideration of parking structures on either of these two park and ride sites as potential alternatives.

As stated by the commentor, the Builder's Emporium site is smaller than the Johnson & Johnson/Merck site. However, the proposal for 1,000 parking spaces is a conservative maximum estimate, and could include some combination of surface or structured parking. In this regard, either site is adequate in size for this amount of parking.

The project description does not provide design details for parking structures on either site. However, the LACMTA has an extensive design review process that involves close cooperation with affected agencies. The City of Pasadena would necessarily be included in review of any proposed parking facilities or structures,. The issues of landscaping and shielding for night lighting could be addressed at that time.

Comment 2.2.2.3-3:

"Impacts from using the Johnson and Johnson site for a park and ride facility include but may not be limited to air, water, plant life, light and glare, land use, transportation/circulation and cultural resources. Impacts from using the Builder's Emporium site would probably involve possible impacts from building a parking structure which could have shade/shadow impacts. Due to the inadequate project description it is not possible to fully analyze all project impacts on the environment."

Response 2.2.2.3-3:

As stated in the previous Response 2.2.2.3-2, design aspects of any parking structures on either of these sites would necessarily include coordination with the City of Pasadena. The LACMTA maintains that this SEIR adequately characterizes the potential impacts of the project, including development of either park and ride site. Shade and shadow effects were not considered significant due to the probable location and size of such structures on either site (i.e., neither would cast shadows onto sensitive uses beyond the property boundaries). However, these and similar architectural issues would be most appropriately addressed at the design review stage.

Comment 2.2.2.3-4:

"Air could be an impact if the existing structures and landscaping at the Johnson and Johnson site are removed and replaced with asphalt for 1,000 surface parking spaces. The absence of landscaping, the increased impermeable surface adsorbing and reflecting sunlight and heat will increase the temperature on the site."

Response 2.2.2.3-4:

The Final SEIR contains additional information on air quality impacts, including dust generation (see Section 2.3.6.1). The LACMTA will provide landscaping to meet local standards as part of site development (for either surface or structured parking). Given that the site was previously developed and that the entire area is already urbanized, the change in reflectivity from redeveloping either site is not considered significant. This conclusion is similar to those reached in other recent environmental documents processed through the City of Pasadena.

Comment 2.2.2.3-5:

"Water is an impact at the Johnson and Johnson site, due to the increase of impermeable surface and subsequent increase in water runoff. The quality of water run-off would also be degraded by containing high amounts of oil-derived residue from cars."

Response 2.2.2.3-5:

The strucutres and parking areas that presently exist on the Johnson & Johnson/Merck site do not present a significantly different impermeable surface area than would the proposed Park and Ride facility, with or without a parking structure. The proposed project will comply with all applicable requirements of the NPDES stormwater permit process. This may include oil traps or other structures to contain urban pollutants onsite prior to their discharge to the municipal storm drain system. This potential impact can be addressed at the time of permit review by the City, County flood control, etc.

Comment 2.2.2.3-6:

"Plant life is an impact since it appears the landscaping will be removed at the Johnson and Johnson site. This landscaping is also part of the significance of the structure. It was designed by a well known landscape architect in cooperation with the architect of the building(s). As part of the park and ride facility, there was no mention of any landscaping which could provide shade, help filter the car emissions and moderate the heat island effect of a large surface parking lot."

Response 2.2.2.3-6:

This issue is more applicable to the analysis of cultural or historic resources. Disposition of existing onsite landscaping will necessarily be tied to the fate of the Johnson & Johnson/Merck facility, because the landscaping materials do not have intrinsic biological value (i.e. no significant native trees, endangered species, etc.).

Development of either park and ride site will include landscaping to meet local standards, and significant impacts related to air quality or heat island effects should not occur.

Comment 2.2.2.3-7:

"Light and glare can be an impact both from the absence of shade, if there is no structure, and the absence of landscaping planned on the Johnson and Johnson site. There will be glare reflected off the parked cars. The night lighting may spillover onto adjacent uses. There was no discussion of shielding the night lighting or of lessening daytime glare from both the cars and the presumed open surface parking lot."

Response 2.2.2.3-7:

As stated previously, the proposed Park and Ride sites will have landscaping installed to meet local standards for either surface or structured parking. Glare should not be a significant factor due to the location of either site (in a commercial/industrial area next to the 210 Freeway). However, the issues of glare and night lighting can be better addressed at the design review stage when a specific development proposal is submitted to the City of Pasadena for review.

Comment 2.2.2.3-8:

"Land use is an impact since it does not appear that the proposed park and ride facility conforms with the intent of the newly adopted Land Use and Mobility Elements. The Johnson and Johnson site is in the E. Pasadena Specific Plan Area which encourages institutional (particularly child care), commercial and industrial uses. There is no mixed development proposed on the site using the existing structure and constructing a parking structure as an alternative to demolishing the existing building and landscaping. Various policies and objectives in the newly adopted elements encourage both transit and pedestrian oriented development. There appears to be no provision of any amenities at either proposed park and ride site. Motorists would be pedestrians between their cars and their walk to the light rail station. Would commuters walking from home or bus stops be accessing the light rail station through the park and ride facility?"

Response 2.2.2.3-8:

The Southern California Association of Governments (SCAG) recommends that land use and mobility elements of local cities accommodate park and ride facilities in appropriate locations to the greatest extent feasible. Either of these sites would be an optimum location for park and ride facilities due to proximity to the 210 freeway and the surrounding local street system. It should be noted that these two sites were added to the proposed project at the request of the City of Pasadena.

No final determination has been made as to surface or structured parking for either site. Similarly, the proposed project would allow for mixed use or reutilization of existing structures such as the Johnson & Johnson/Merck building. The provision of pedestrian facilities is best addressed at the design review stage, which would necessarily include the City of Pasadena. It is likely that local residents may walk to either Park and Ride facility, and the existing street/sidewalk system can accommodate their access.

The LACMTA has installed child care facilities at other park and ride facilities, and will likely pursue similar facilities at either of these locations.

Comment 2.2.2.3-9:

"Transportation/circulation is a possible impact since transfers between different modes of transportation are not adequately discussed."

Response 2.2.2.3-9:

It is not known at this point whether access from either site to the adjacent 210 freeway would be by an overhead or underground structure. Multi-modal access (i.e. bus, rail, pedestrian, auto) to either site would be a design consideration of site planning and development.

Comment 2.2.2.3-10:

"Cultural resources is an impact if the Johnson and Johnson structure and landscaping is demolished and if the Craftsmen houses in Highland Park are demolished. No alternatives to clearing the Johnson and Johnson site and still using the site for a park and ride facility were discussed."

Response 2.2.2.3-10:

Mitigation measures for impacts to cultural resources are thoroughly discussed in DSEIR Section 4.10. Please see response 2.2.2.5-7 for a discussion of alternatives.

2.2.2.4 Memorandum from John Jontig, City of Pasadena Public Works and Transportation Department; May 9, 1994

Comment 2.2.2.4-1:

"The City of Pasadena prefers and recommends the J & J-Merck site for station access and park and ride garage for the station at Sierra Madre Villa. The former Builders Emporium site is now occupied by a new business, Orchard Hardware Supply, and is believed to have an unwilling seller. Condemnation costs plus relocation of a major business would prove to be prohibitive."

Response 2.2.2.4-1:

Comment noted.

Comment 2.2.2.4-2:

"The Los Angeles to east Pasadena Light Rail Transit Project is the first phase of what is expected to be light rail service east to Irwindale to Azusa within or adjacent to the 210 Foothill Freeway corridor. The requirement of a 1000 car park and ride garage is so sized as the Sierra Madre Villa location will be the interim terminal station."

Response 2.2.2.4-2:

The commentor is correct in both statements.

Comment 2.2.2.4-3:

"The City requests that the SEIR consider any environmental impacts to the Sierra Madre Villa site that would occur if the 1000 car park and ride garage were reduced in size due to the relocation of the light rail terminal to the east."

Response 2.2.2.4-3:

The overall impacts identified in the SEIR would occur regardless of various factors such as internal site design, access points, etc. Relocation of a light rail terminal to the east and downsizing of the Sierra Madre Villa site would produce less impacts than identified in the SEIR, due to fewer parking spaces and the resulting lower traffic volumes. Therefore, the analysis in the SEIR represents the "worst case" situation.

Comment 2.2.2.4-4:

"There is information (MTA preliminary surface parking drawing) that indicates the MTA may intend to take two parcels (A and B) in addition to the J & J-Merck property at the Sierra Madre Villa site."

Response 2.2.2.4-4:

It is the LACMTA's intent to take the two identified parcels which were not specifically identified in SEIR graphics. The impacts of this action are anticipated to be within those already identified in the SEIR, other than the relocation of any existing businesses. This is a fiscal impact, however, which is not considered an integral part of the CEQA review process. (See Figure 2-2 in this FEIR, Section 2.3.4.)

Comment 2.2.2.4-5:

"Parcel A at the corner of Foothill Boulevard and Halstead Street contains a business that has recently spent a great deal of money in upgrading the property and business. It would be environmentally detrimental to replace an upgraded building and business with surface parking."

Response 2.2.2.4-5:

It would be an economic impact to the particular business that was displaced, and could also be a minor fiscal impact to the City if the business were to relocate outside of the City. However, these are economic impacts which are specifically excluded from consideration in the CEQA process (i.e., not part of the natural environment).

Comment 2.2.2.4-6:

"It is the City's understanding that the property owner is unwilling to sell thus a take by condemnation would be required. That action would be very costly to the MTA to cover property, business and relocation costs. A garage structure appears to be environmentally and financially sound."

Response 2.2.2.4-6:

The LACMTA will base its decision to install surface or structured parking based on a variety of factors, including cost of construction and relocation of existing businesses. The costs associated with relocating this particular business may or may not be a key factor in the decision to install a particular type of parking.

Comment 2.2.2.4-7:

"The City is concerned about the possible problems caused by horn and operational noise of light rail transit in residential neighborhoods along the alignment including some within Pasadena. There is particular interest in horn sounds reverberating in parts of the City. The frequency and sound quality of the horns is also of concern. The City would like to continue to work with the MTA on mitigation efforts to reduce noise problems. We request that the SEIR address these environmental concerns."

Response 2.2.2.4-7:

For information on train horn impacts and mitigation measures, see Response 4 to the letter from the City of South Pasadena (Section 2.2.2.8).

Comment 2.2.2.4-8:

"Pasadena Traffic Engineering staff has reviewed the Transportation and Circulation portion of the SEIR for the Pasadena-Los Angeles Light Rail Transit Project... While the mitigation provided in the SEIR appears to meet the requirements of the City of Pasadena it is recommended that the mitigations be revised as follows to ensure they appropriately address the traffic mitigations to the Foothill Boulevard traffic. Traffic control signals will have to be modified at the impacted intersections in order to make the mitigations work."

Response 2.2.2.4-8:

The LACMTA has coordinated the proposed conceptual plans at both potential Park and Ride sites with the City of Pasadena, including the Traffic Engineering department, and will continue this coordination effort and final design plans are developed.

Comment 2.2.2.4-9:

"SECTION 4.7.5.2: SIERRA MADRE VILLA PARK AND RIDE: Staff agrees with the analysis for determining which intersections will be significantly impacted by this project. Several mitigation measures will have to be revised as follows:

1. Halstead Street and Foothill Boulevard: The mitigation recommended is not applicable to the needs of Light Rail Park and Ride Facility. Beginning with the second sentence, the paragraph should be revised to read "*This can be accomplished by widening Halstead Street four feet from Foothill Boulevard south to the cul-de-sac to provide dual northbound left-turn lanes including protected left-turn signal phases for all directions and restriping the southbound approach to provide an exclusive right-turn lane. The eastbound approach should be restriped to provide for a minimum 100 foot long exclusive right-turn lane. This will require removing some parking along the south side of foothill boulevard. Signal timing changes and detector placements should be considered at the time of restriping.*" The ICU calculations should be revised to show this mitigation (use 2880 vehicles/hour capacity for the dual left-turn).

2. I-210 West-Bound Ramps and Sierra Madre Villa Avenue: Parking management may crate a reduction during the peak periods, but for the purpose of providing quantitative mitigation, the mitigation should be to provide dual northbound left-turn lanes onto the I-210 Freeway."

Response 2.2.2.4-9:

The LACMTA agrees to modify these mitigation measures consistent with the City's recommendations.

Comment 2.2.2.4-10:

"GENERAL COMMENT: The intersection of Rosemead Boulevard and Colorado Boulevard is not in the City of Pasadena and should be reviewed [by] the County of Los Angeles. As a comment regarding the recommended mitigation, providing an additional through lane is only valid when the new lane can be carried for a considerable distance in order to truly provide additional link capacity."

Response 2.2.2.4-10:

Comment noted. The LACMTA is coordinating street and other improvements with the appropriate jurisdictions, including the County of Los Angeles.

2.2.2.5 Memorandum from City of Pasadena Cultural Heritage Commission; April 19, 1994

Comment 2.2.2.5-1:

"The Cultural Heritage Commission unanimously supports the retention and preservation of the ...[Johnson & Johnson/Merck Building, historically known as the Stuart Pharmaceutical Building]. Furthermore, this recommendation is based on the historical and cultural significance to the City of Pasadena, and the strong belief that the historically significant portions of the building can be adaptively used to the betterment of the design and function of the proposed light rail station and retain this site as a cultural resource in the East Pasadena community.

"Nationally, when we look at interstate travel - and intrastate travel within California - railroad and light rail stations have become transportation centers, creating an active area and synergy that extend beyond the movement of the trains. While not initially used as a train station, the Stuart Building offers the opportunity to establish a similar setting for the East Pasadena site. With an internationally acclaimed building, the MTA has the possibility, if not the mandate, to provide the community with something more than a vast "sea of asphalt and automobiles."

"The adaptive reuse of the building will provide additional business uses, extend the hours of the building, create interest in light rail, provide a more celebratory travel experience, and maintain an asset to the city of national significance.

"The DSEIR identifies the Johnson & Johnson/Merck Building as a cultural resource; however, it errors greatly in proposing mitigation measures for the loss of such an important building. And, the DSEIR offers no alternative to demolition, despite existing real estate studies offering many options.

"In closing we urge that MTA not only consider the reuse of the building, but review existing adaptive re-use studies. With the use of the Santa Fe Depot and the Stuart Building, the City of Pasadena would have two great transportation centers. These two centers will reflect the

growth of the city from an early resort center to a high-tech industrial center for the space age. The East Pasadena area would retain a landmark and community asset and the light rail would have wonderful entrance to the city."

Response 2.2.2.5-1:

Informational comments noted. While the SEIR identifies demolition of the Johnson & Johnson/Merck building as a worst case scenario, it does not preclude the option for adaptive reuse or at least temporary preservation of this historic structure. The LACMTA is continuing to discuss potential options for reuse, however, economic conditions have restricted current options.

Comment 2.2.2.5-2:

"[Pg. 2-5, 4-96] Demolition of the Johnson & Johnson/Merck building (historic name: Stuart Pharmaceutical Company) at 3360 East Foothill Boulevard, Pasadena, would be a significant unavoidable environmental effect that could not be mitigated to a level of insignificance by photography, measured drawings, and oral histories. The demolition should be listed on pg. 5-1 under the category of significant unavoidable environmental effects."

Response 2.2.2.5-2:

The LACMTA maintains that the proposed measures are generally accepted in the industry as adequate to mitigate cultural impacts that would occur from the loss of this facility. It is also noted that review and approval of a mitigation plan by the State Historical Preservation Officer (SHPO) is required.

Comment 2.2.2.5-3:

"[Pg. 4-89] The paragraph describing the work of Edward Durell Stone has inaccuracies (e.g., "rare example of the New Formalism style of architecture," "industrial architecture," Waldorf-Astoria Hotel)."

Response 2.2.2.5-3:

Comment noted. However, the City did not provide substitute wording or indicate which portions of the description are inaccurate. Regardless of the details, the basic conclusion that the facility is a local historical resource does not change.

Comment 2.2.2.5-4:

"[Pg. 4-90] Pasadena Heritage, a private community organization *not* the Cultural Heritage Commission, has nominated the Johnson & Johnson/Merck building for listing in the National Register of Historic Places."

Response 2.2.2.5-4:

Comment noted.

Comment 2.2.2.5-5:

"[Pg. 4-16, 4-92] Under air quality, the environmental analysis identifies the demolition of a "maximum of seven buildings at the proposed Johnson & Johnson/Merck site" and describes demolition of seven buildings as a "worst case scenario." Subsequently, under cultural resources, the report notes - unequivocally - "all of the buildings would be subject to demolition." Which statement is correct?"

Response 2.2.2.5-5:

The air quality calculations prepared for the SEIR are presented herein in Section 2.3.6.1. They include two scenarios: demolition of seven buildings or demolition of eleven buildings. Both scenarios resulted in air emissions below maximum allowable levels. The "eleven building" scenario would be the worst case alternative. However, the project allows the option of preserving these buildings in conjunction with a parking structure. The statement "would be subject to demolition" was meant to indicate the potential, not a foregone conclusion.

Comment 2.2.2.5-6:

"A decision about the National Register nomination is not the only measurement of the significance (or "status") of the Johnson & Johnson/Merck building (and findings of "exceptional significance," well beyond the thresholds for the California Environmental Quality Act, are required to list a cultural resource under fifty years old in the National Register). In 1992, the City of Pasadena's Cultural Heritage Commission determined that the building met the criteria for designation as a City "treasure" (a higher category of local landmark). Moreover, two extensively researched reports and numerous letters from scholars across the country attest to the importance of the building.

"Given this evidence, the Commission disagrees with the conclusion that a "conservative approach" to mitigation is necessary only while the National Register nomination is pending.

"The mitigation plan cannot be linked to the possibility of actual "listing" in the Register. The building will *not* be listed in the Register because the property owners have formally objected to the nomination. At this point, the State Historical Resources Commission may only forward a recommendation to the National Park Service, the agency which ultimately determines eligibility for listing."

Response 2.2.2.5-6:

The intent of paragraph 4, DSEIR page 4-93, was only to point out that structures nominated for listing in the National Register of Historic Places must be treated as if listed until a determination

is made by SHPO. The LACMTA acknowledges the local historical significance of the subject buildings, but maintains that the proposed mitigation measures are considered adequate to preserve information on the resource. It should be noted that preservation of all structures with local historical value is not practical in terms of economy or land use.

Comment 2.2.2.5-7:

"The report does not consider alternatives to the proposed demolition of the building at 3360 E. Foothill Blvd. According to the Public Resources Code of the State of California (California Environmental Quality Act, Sec. 15126), an EIR should discuss "a range of reasonable alternatives to the project ...[including] alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The report apparently considers the site formerly occupied by Builder's Emporium as the alternative project. Yet, it omits any discussion of adaptive reuse of the Johnson & Johnson/Merck building or of constructing a multi-level parking structure as an alternative to surface parking."

Response 2.2.2.5-7:

The original EIR examined a variety of alternatives to the overall project, as required by CEQA. There is no requirement for a supplemental EIR to examine additional alternatives unless they would reduce or eliminate a significant environmental impact. While the Johnson & Johnson/Merck facilities represent a local historical resource, the LACMTA has proposed measures to adequately mitigate impacts associated with their loss. It should be noted that preservation is not always the best alternative for older structures, but the LACMTA is willing to consider some type of preservation or adaptive reuse for these facilities if it proves to be economically viable while meeting the needs of the project..

Comment 2.2.2.5-8:

"Until release of the supplemental EIR, the understanding of the Commission was that the Metropolitan Transit Authority would explore adaptive reuse of the historic building. A March 1993 adaptive reuse study of the site (by Halcyon Real Estate Advisors/Ernst & Young) considered eight options. Two of these options proposed integrating the historic building into new development accompanying the Sierra Madre Villa light rail station. This study recognizes that adaptive reuse of the building in connection with a light rail station would be difficult because of "surface traffic issues," but no analysis of adaptive reuse or the obstacles posed by traffic circulation are included in the EIR."

Response 2.2.2.5-8:

For information on alternatives, see Response 2.2.2.5-7, above. Although the LACMTA has not ruled out adaptive reuse, recent economic conditions and transit considerations of the site severely limit the agency's options regarding adaptive reuse.

Comment 2.2.2.5-9:

"[Pg. 4-82] The locations of sound barrier walls within Pasadena are not identified in the report. At heights of four or eight feet, these walls could have an adverse visual impact on historic resources (especially if proposed for locations within the Old Pasadena National Register District)."

Response 2.2.2.5-9:

It was not the intent of this SEIR to address sound barrier walls in Pasadena. The project description (DSEIR Section 3.3.5) limits sound barrier wall modifications to Highland Park and South Pasadena. However, the City of Pasadena has been involved in the process of locating and/or reducing the height of various sound walls. The LACMTA is not aware of any sound wall location that would block views of local historical resources in Pasadena. Nonetheless, the LACMTA is willing to review the design and/or placement of any sound walls that preclude public views of significant historic resources.

2.2.2.6 Memorandum from City of Pasadena Design Commission; April 27, 1994

Comment 2.2.2.6-1:

"[Pg. 1-7] The supplemental EIR contends that the light rail project would have no significant effects on plant life, light and glare, and aesthetics. The introduction of a surface parking lot for 1,000 cars at the Sierra Madre Villa station, however, would have potentially significant effects on plant life, light and glare, and aesthetics. The parking facility, for example, would affect plant life by removing mature landscaping on the grounds of the Johnson & Johnson/Merck building. Among the notable plant life on these grounds are Mediterranean fan palms and cypress trees, orange trees, and olive trees. The illumination of 10 acres of surface parking might cause substantial light and glare, and nine acres of surface parking would visually degrade the area."

Response 2.2.2.6-1:

Information on these potential impacts are discussed in the responses to comments in the letter from Nancy Key (Responses 2 through 7 in particular), City of Pasadena Zoning and Subdivision Administration (Section 2.2.2.3).

Comment 2.2.2.6-2:

"[Pg. 2-5, 4-96] Demolition of the Johnson & Johnson/Merck building (historic name: Stuart Pharmaceutical Company) at 3360 E. Foothill Boulevard, Pasadena, would be a significant unavoidable environmental effect that could not be mitigated to a level of insignificance by photography, measured drawings, and oral histories. The demolition should be listed on pg. 5-1 under the category of significant unavoidable environmental effects. The building and its

grounds are a noted work of the internationally renowned architect, Edward Durell Stone (1902-1978), and the distinguished landscape architect, Thomas D. Church (1902-1978)."

Response 2.2.2.6-2:

This issue is discussed at length in various responses to comments by Nancy Key with the City of Pasadena and the City of Pasadena Cultural Heritage Commission. Please refer to Sections 2.2.2.3 and 2.2.2.5, above.

Comment 2.2.2.6-3:

"[Pg. 3-10] The report indicates that the Sierra Madre Villa park-and-ride facility requires 1,000 spaces. It does not, however, describe the facility in any detail. Previous studies from the Metropolitan Transportation Authority proposed (for the Johnson & Johnson/Merck site) a three-story or five-story parking structure adjacent to the Foothill Freeway. An alternative study proposed a nine-acre, surface parking lot. Without a physical description of the park-and-ride facility, no assessment of environmental effects (notably the three concerns previously cited) is possible."

Response 2.2.2.6-3:

This issue is discussed at length in various responses to comments by Nancy Key with the City of Pasadena, and the various memoranda from the City of Pasadena. Please refer to Sections 2.2.2.3 and 2.2.2.5, above.

Comment 2.2.2.6-4:

"[Pg. 4-16, 4-92] Under air quality, the environmental analysis identifies the demolition of a "maximum of seven building at the proposed Johnson & Johnson/Merck site" and describes demolition of seven buildings as a "worst case scenario." Subsequently, under cultural resources, the report notes - unequivocally - "all of the building would be subject to demolition." Which statement is correct?"

Response 2.2.2.6-4:

This comment is identical to Comment 2.2.2.5-5 from the City of Pasadena Cultural Heritage Commission. Please see Response 2.2.2.5-5, above.

Comment 2.2.2.6-5:

"The report does *not* consider alternatives to the proposed demolition of the building at 3360 E. Foothill Blvd. According to the Public Resources Code of the State of California (California Environmental Quality Act, Sec. 15126), an EIR should discuss "a range of reasonable alternatives to the project...[including] alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if

these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The report apparently considers the site formerly occupied by Builder's Emporium as the alternative project. Yet, it omits any discussion of adaptive reuse of the Johnson & Johnson/Merck building or of constructing a multi-level parking structure as an alternative to surface parking."

Response 2.2.2.6-5:

This comment is identical to Comment 2.2.2.5-7 from the City of Pasadena Cultural Heritage Commission. Please see Response 2.2.2.5-7, above.

Comment 2.2.2.6-6:

"[Pg. 4-82] The locations (if any) of sound barrier walls within Pasadena are not identified in the report. At heights of four or eight feet, these walls could have an adverse visual impact on the visual character of the light rail corridor."

Response 2.2.2.6-6:

Please see Response 2.2.2.5-9, above, in the memorandum from the City of Pasadena Cultural Heritage Commission, and Response 2.2.2.8-1, below, in the letter from the City of South Pasadena.

2.2.2.7 Letter from Robert Huddy, City of Pasadena Transportation Advisory Committee; May 9, 1994

Comment 2.2.2.7-1:

"**Park and Ride Facility at Foothill Boulevard and Sierra Madre Villa:**
The report was general in nature and did not disclose what type of facility was to be located at the site. The Commission had information that indicated a 1000 car surface lot was to be built at this site. The Commission feels this is not appropriate for the site and would be environmentally detrimental to the area. The expected garage on the southern section of the site, next to the freeway, would be reasonable and appropriate to the site."

Response 2.2.2.7-1:

For information on the Sierra Madre Villa park and ride site, see various responses (including Response 10) in the letter from Nancy Key with the City of Pasadena. Please see Responses 2.2.2.3-2, -3, and -8; 2.2.2.4-6; and 2.2.2.5-1, -7, and -8.

Comment 2.2.2.7-2:

"**Builders Emporium Site:**
The former Builders Emporium site is no longer available as the site and building have been modified for a new tenant, Orchard Hardware Supply."

Response 2.2.2.7-2:

Comment Noted.

2.2.2.8 Letter from Ken Farfsing, City of South Pasadena; May 5, 1994

Comment 2.2.2.8-1:

"NOISE WALLS - There were several noise walls which did not make any apparent sense. Sections of walls were adjacent to commercial and industrial property, where they are clearly not necessary. There were several houses immediately adjacent to the alignment with no sound walls."

Response 2.2.2.8-1:

The optimum location and size of sound walls depends on many complex factors such as local topography, distance from noise sources, ambient noise levels, and local perceptions of existing noise. For example, noise levels in some locations along the project route may exceed present standards, while other areas are relatively quiet. In addition, residents in quiet areas would be more likely to perceive a greater increase in overall noise levels as a result of the project compared to areas with already high noise levels. For these reasons, the planning, design, and construction of sound walls must be coordinated with local jurisdictions to adequately mitigate potential noise impacts.

It is LACMTA's policy to work closely with local officials on the design of sound walls within their jurisdiction. To this end, the LACMTA has met on a regular basis with the cities involved on this project, including the City of South Pasadena. The information in the SEIR on location and size of sound walls was the most current available to the LACMTA. However, final design and actual construction of the sound walls for this project may change based on further input from the affected agencies.

The LACMTA will add the following measure to the mitigation monitoring plan to assure that sound walls best meet applicable noise criteria as well as aesthetic and other local needs:

> "LACMTA will coordinate final design and construction of sound barrier walls with affected agencies. Final plans will be submitted to the building departments of affected agencies at least 45 days prior to the start of construction, and revised as necessary."

Comment 2.2.2.8-2:

"Arroyo Vista School requires focused sound studies."

Response 2.2.2.8-2:

The noise study in the antecedent EIR did examine the Arroyo Vista School site and recommended appropriate measures to mitigate potential noise impacts. However, the LACMTA will conduct an additional noise survey before, and will meet with school representatives to discuss the survey and mitigation design prior to proceeding with a mitigation.

To this end, the LACMTA will add the following measure to the mitigation monitoring plan:

> "The LACMTA will conduct a noise survey at Arroyo Vista School to design the most appropriate noise mitigation measure. If the survey determines that applicable noise standards will not be met, the LACMTA will install additional improvements such as replacing windows or doors. Prior to constructing any improvements in this regard, the LACMTA will meet with school officials to explain the improvements and plan their installation."

Comment 2.2.2.8-3:

"I am transmitting with this letter exhibits which indicate the correct locations of noise walls. Please include these exhibits in the SEIR as the required mitigation measure for the areas within the City of South Pasadena."

Comment 2.2.2.8-3:

The LACMTA will review the exhibits provided by the City and include into them in the final sound wall design, as appropriate. It should be noted that very few of the sound walls proposed in the original EIR for South Pasadena were modified. The LACMTA lowered or shortened certain walls at the request of the community to alleviate concerns over aesthetics (i.e. walls that were too massive) and line of sight problems (i.e. by train operators and drivers at crossings). The LACMTA will also be using various offsite measures such as double-paned glass and noise resistant doors to further reduce potential noise impacts.

Comment 2.2.2.8-4:

"HORN NOISE - RCC and MTA staff met with the City of South Pasadena on April 25, 1994 to discuss the horn noise situation and wayside horn system. We were given a copy of an April 6, 1994 study of a wayside horn system. The draft SEIR should include this study. The SEIR should also state the current progress of the design of the electronic car horn.

The SEIR should include the following mitigation measures for horn noise:

1. The MTA/RCC will continue to develop the wayside horn system. Cities along the corridor will continue to be consulted on the development and implementation of the wayside horn system.

2. The RCC/MTA will use good faith efforts to seek approval of the wayside horn system from the Public Utilities Commission. RCC/MTA staff shall continue to work with PUC staff in the development and testing of the wayside horn system.

3. MTA/RCC will continue to develop and implement the electronic car horn. Cities along the corridor will be consulted on the car horn noise issue. MTA/RCC will work with the cities on the duration, pitch and other horn variables prior to the implementation of the car horns."

Response 2.2.2.8-4:

Because a wayside horn study has not yet been submitted to the CPUC for approval, it is considered too speculative to include in this SEIR. However, the LACMTA will continue its work on the wayside horn system and will implement it if, and when, approved by the CPUC.

In this regard, the LACMTA will include the following measure into the mitigation monitoring plan:

> "LACMTA will continue to develop a wayside horn system and seek its approval from the CPUC. LACMTA will work with local cities regarding the duration, pitch and other horn variables prior to implementation."

Comment 2.2.2.8-5:

"TRACTION POWER STATIONS - Neither this Draft SEIR nor previous documents discuss the potential historic resource losses due to the traction power station at 1111 Magnolia Street. The property has one of the original Rancho Santa Fe homes, which is currently proposed for demolition by the RCC.

The following mitigation measures should be incorporated into the draft SEIR:

1. RCC staff shall notify the City of South Pasadena six months prior to the proposed demolition of the residence located at 1111 Magnolia Street.

2. RCC staff shall permit the City of South Pasadena to relocate the home within the six-month period. RCC shall sell the residence at a nominal value to the City.

3. All heritage trees and significant trees shall be retained on the traction power station sites. These trees shall be integrated into the final landscape development plans for the site."

Response 2.2.2.8-5:

Although the traction power station is not a subject of this SEIR, the LACMTA will incorporate the following measures into the mitigation monitoring plan:

> "The LACMTA will notify the City of South Pasadena at least six months prior to demolition of the residence located at 1111 Magnolia Street. The LACMTA will permit the City to relocate the home during this period. If requested, the LACMTA will sell the residence at or below fair market value to the City. Heritage or significant trees on this site will be retained to the greatest degree feasible, and shall be integrated into the final landscape development plans for the site."

Comment 2.2.2.8-6:

"Please include these comments and mitigation measures in the Draft SEIR. The City respectfully requests a copy of the Notice of Completion in order that we may exercise our rights under CEQA in a timely manner."

Response 2.2.2.8-6:

The LACMTA has reviewed these comments and mitigation measures, and has incorporated them into this Final SEIR and Mitigation Monitoring Plan as indicated above. The LACMTA will provide a copy of the Notice of Completion to the City of South Pasadena within 5 days after the Final SEIR is certified.

2.2.2.9 Memorandum from Wilford Melton, California Department of Transportation (Caltrans); April 29, 1994

Comment 2.2.2.9-1:

"On Page 2-5, Table 2.2-1, Transportation and Circulation - the contra-flow lane proposed as a mitigation measure for access to the E/B I-210 from the Johnson & Johnson parking site will have significant traffic impacts on state facilities. Early coordination with Caltrans is recommended."

Response 2.2.2.9-1:

LACMTA understands that Caltrans will not accept a contra-flow lane for the proposed project. Significant impacts will be adequately mitigated without contra-flow lanes.

Comment 2.2.2.9-2:

"On Page 3-10, Section 3.3.7, the description should include the proposed contra-flow lane arrangement as a mitigation measure for traffic circulation impacts for access to the E/B I-210 from the Johnson & Johnson parking site."

Response 2.2.2.9-2:

Contra-flow lanes are no longer being considered for the proposed project. Significant impacts will be adequately mitigated without contra-flow lanes.

Comment 2.2.2.9-3:

On page 4-59, section 4.7.2, for projected traffic volumes for the on and off-ramps at the Sierra Madre Villa intersection, Caltrans criteria needs to be considered if it gives larger volumes."

Response 2.2.2.9-3:

During a telephone conversation between Mr. Kent Norton (of LACMTA's contractor, Tetra Tech, Inc.) and the commentor (Mr. Wilford Melton of Caltrans) on May 11, 1994, Mr. Melton indicated that the criteria of the City of Pasadena used to calculate traffic volumes at the Sierra Madre Villa intersection are appropriate and Caltrans criteria need not be considered.

2.2.2.10 Letter from Donald Johnson, California Public Utilities Commission; April 28, 1994

Comment 2.2.2.10-1:

"We note... on page 3-4, Section 3.3.4.3 that reference is made to a switch yard operated by AT&SF. The Midway Yard is actually operated by SPTC."

Response 2.2.2.10-1:

Comment noted.

2.2.2.11 Letter from Kevin Sweeten, Kevin Michael Studio, Pasadena; April 26, 1994

Comment 2.2.2.11-1:

"1. What will the site look like? A large parking lot and/or train station?
"2. Where will passengers be going or coming from?
"3. The asking price of that property is high. Why would the MTA need such a large and expensive piece of property anyway?"

Response 2.2.2.11-1:

1. Please refer to Figure 2-2 in Section 2.3 herein for a drawing of the proposed Johnson & Johnson/Merck Park and Ride facility. The facility will be a 1,000 car parking lot with an alternative for a future multi-level parking structure.

2. The passengers will be going between the Park and Ride facility and the station that will be located in the Foothill (210) Freeway median.
3. The property is one of three alternative sites that has been reviewed in this document and the Final EIR (LACTC, 1990.) The California Environmental Quality Act requires that projects be analyzed according to their potential impacts on the environment, irrespective of cost. Cost is, of course, a practical issue that will be considered in the selection of the final Park and Ride site. There are also hidden costs, such as hazardous waste cleanup expenses, that must be considered when comparing the three alternative sites.

2.2.2.12 Letter from King Leonard, Lacy Street Production Center; May 4, 1994

Comment 2.2.2.12-1:

"...Section 4 of this Draft SEIR identifies 'Orion Pictures' and the facilities generally as 'Railroad Industrial'. We wish to point out that Orion Pictures was simply a lessee of the facilities...but the ownership was at that time and continues to be, the present owners." (p.2)

Response 2.2.2.12-1:

Comment noted; the property is owned by Lacy Street Production Center.

Comment 2.2.2.12-2:

"Our evaluation of this Draft SEIR was hampered by missing information, missing references, and inconsistency between various CEQA documents prepared over an extended period of time." (p.3)

Response 2.2.2.12-2:

Several individuals and agencies commented on various aspects of the overall project, and it is critical to keep in mind the role this particular document plays in the CEQA process for the overall LRT (Blue Line) Project. This document is the second Supplemental EIR, which analyze aspects of the project that have been modified from the original EIR and first Supplemental EIR. Similarly, the first SEIR analyzed those aspects of the project that were modified from the original EIR. The complexity of this project, and the need for changes over time, have led to the preparation of three separate but related environmental documents. This type of document (SEIR) should not be confused with a focused EIR which would analyze in detail various technical aspects of a specific development project. The LACMTA acknowledges that this process may be confusing to the general public, but is required to meet the intent and legal requirements of CEQA. However, it must be remembered that this SEIR analyzes only the most recent changes to the proposed project and by definition does not analyze aspects that have not changed significantly from previous CEQA documents.

Comment 2.2.2.12-3:

"We noted certain information missing from this document, such as the proposed electrical booster station which is now proposed to the east of our facilities. Originally we thought this facility would be to the south of our facilities and was sufficient distance from the studios so as not to be a significant impact. We believe that this general problem of the electrical booster stations and the noise levels emitted from such facilities has not been focused on in this SEIR at a time when property purchases are eminent..."

"In some instances booster stations may require different zoning or a conditional use permit, depending upon the jurisdiction. We noted no analysis of jurisdictional requirements for these types of discretionary decisions and wondered if MTA/RCC were required to meet any such standards. At a minimum, the SEIR should address the design standard and noise/acoustical improvements that could be provided to mitigate impact of these booster stations. We believe that putting a booster station adjacent to a film studio creates very significant impacts that should be mitigated and that should be reflected in a Mitigation Monitoring Plan." (pp. 3 to 4)

Response 2.2.2.12-3:

The overall discussion of noise and land use impacts of TPSS (booster stations) was analyzed in sufficient detail in the original EIR, and is not part of this SEIR. While the subject power traction station has been moved slightly from its originally proposed location, this change is not considered significant and no additional noise or vibration impacts are anticipated. It should be noted that the LACMTA has been working with the Lacy Street Production Center due to the noise-sensitive nature of its operations. The LACMTA will identify any specific potential noise impacts to this business (from the traction power substation) and develop appropriate measures to minimize noise impacts, if necessary. The original EIR did not identify any significant land use impacts from installation of power traction stations.

Comment 2.2.2.12-4:

"We note that the State Supreme Court has held that the notice requirements of CEQA, while sufficient to encourage general public participation in the environmental decision making process, are inadequate to meet due process standards for notice on the underlying project(s) where fundamental interests are substantially affected." (p. 3)

Response 2.2.2.12-4:

The MTA considers its notification procedures adequate to meet CEQA requirements as they apply to this project. Additional notification required under a city or due process will be made at the appropriate time(s).

Comment 2.2.2.12-5:

"In the general section on noise and vibration we noted that Section 4.4.2, again needs clarification as to "Orion Pictures" and "Railroad Industrial". At a minimum the studios should be called out as a designated film studio and the acoustical standards that we provided you through the Charles M. Salter report (and again noted in the Wilson Ihrig report prepared by your office) should be properly cited in the SEIR and included as appendices." (p. 4)

Response 2.2.2.12-5:

The data and analyses provided in the SEIR regarding land use and noise standards meet local requirements and are considered adequate to identify potential impacts. However, the LACMTA periodically reviews specific requests to reduce or eliminate potential noise impacts from its operations. Site specific analyses and standards are not within the scope of this SEIR but can be addressed through a third party agreement with the LACMTA.

Comment 2.2.2.12-6:

"We noted comments by the City Administrator of Pasadena regarding horn noise and the SEIR tends to focus on some kind of decision hopefully to be rendered by the California Public Utilities Commission (CPUC). We would suggest that these kind of deliberations at the California Public Utilities Commission (CPUC) level are not a solution to the set of problems that require mitigation at the project level. It may be necessary for you to establish standards at the state level but mitigation of the problems should occur in the SEIR and be reflected in the Mitigation Monitoring Plan." (p. 4)

Response 2.2.2.12-6:

The LACMTA is currently developing a wayside horn program, which will be implemented if and when it is approved by the CPUC. For additional information, see the related Response 2.2.2.8-4 in the letter from the City of South Pasadena (Section 2.2.2.8).

Comment 2.2.2.12-7:

"As for mitigation for the vibration impacts from the proposed transit system, we continue to believe that BMC or BMS construction should be included to the rear of the Lacy Street Production Center and shown in Table 4.4-10. We believe that the elimination of sound walls generally may not be good where trains are approaching the 26th Street Station on a curve. Additionally, a low wall along and adjacent to the tracks would eliminate much of the wheel noise that will probably occur in the future... Additionally, the track area has some drainage problems associated with it and since our buildings are directly abutting the railroad right of way we believe the drainage problem should be resolved prior to construction of the Pasadena Blue Line... We would propose that mitigation of vibration and noise impacts be accomplished before construction is undertaken in 1995 so that filming can continue uninterrupted.

"Our preferred alternative, as recommended in the Salter report, is a barn/tunnel type enclosure of the transit line behind the studios, approximately 600 feet in length. However, we have suggested to your staff that a logical method of handling any on-site mitigation is a third party agreement similar to that used by the Bay Area Rapid Transit District... PUC Section 180106(b) permits transit authorities broad latitude in hiring and contracting. PUC Section 180154 governs bidding procedures and provides MTA/RCC with more than adequate legal protection for undertaking third party type agreements.

"The SEIR provides some indication of site specific mitigation measures but these have not been offered to Lacy Production Studios in our discussions with staff. An example would be the replacement of windows and special treatment of older buildings. The SEIR does speak to the issue of "historic buildings" but does not recognize the studio as having historic character. We would suggest that the historic buildings are no different than many of the older buildings in China Town, along Lacy Street, or in the Pasadena area. When a transit system is developed in older areas of a city then special architectural treatment and acoustical treatments are required. This kind of work cannot be generically treated in a transit authorities Line Construction Standards Manual.

"In Table 4.4-2 the footnote references to vibration measurement locations should be clarified. We're not certain that the public knows what the "WIA, 1993" report is about. Does this include the Wilson Ihrig report completed for the studios? The test below refers to more restrictive criteria, however there is no mention of motion picture studios and the NC35 criterion in the Wilson Ihrig Report.

"Under "off-site mitigation", page 4-41, no mention is made of older buildings such as the studios where sealing entire buildings to mitigate noise and vibration will result in need for additional air conditioning units...

"Station construction and operation will require different considerations with respect to the studios. A portion of the "chop shop", indicated on Figure 2 as the garage set, abuts the 26th Street Station area. The need to mitigate noise levels on this side of the complex is critical and there needs to be considerable thought given to the architectural treatment along 26th Street as it relates to the station architecture (textures, colors, materials). The increased levels of noise from doors, horns, gongs, and parking lot activity should be considered in the SEIR and mitigated for an important facility such as a motion picture studio." (pp. 4 through 6)

Response 2.2.2.12-7:

The location, height, and length of sound walls, proposed in this (second) SEIR, as well as those previously proposed in the EIR and first SEIR, were determined by calculating potential noise impacts on sensitive receptors compared to local noise standards. This also applies to off-site mitigation recommended for sensitive receptors in this document. The site specific information provided in this comment is not within the scope of this SEIR, but should be addressed through a third party agreement with the LACMTA.

This SEIR does not analyze stations or other facilities to be constructed that were already addressed in the original EIR and first SEIR, and where no significant changes have occurred to the project and/or related facilities.

Comment 2.2.2.12-8:

"As a general comment we noted that there is no mention of the timing of mitigation measures or construction. A schedule should be part of the Mitigation Monitoring Plan." (p. 6)

Response 2.2.2.12-8:

The Mitigation Monitoring Plan will include the timing of measures and construction. It will also include a general schedule for construction, pre-operation, and other milestones needed to implement the project.

Comment 2.2.2.12-9:

"We have previously provided your staff with information regarding the Department of Water & Power (DWP) facilities being constructed to the south of our facilities. There appears to be no information in the SEIR regarding permits in the pipeline, types of permits, construction under way on other properties and the cumulative implications of transit to these land uses." (p. 6)

Response 2.2.2.12-9:

Construction of the DWP facilities is not within the scope of this SEIR. Impacts from the new DPW facilities should have been addressed in the environmental documentation for those facilities. However, related construction will meet all permitting requirements of applicable agencies. (See Table 1.1-1 in the DSEIR.)

Comment 2.2.2.12-10:

"Other impacts to the Lacy Street Production Center will include reverberation of noise from the new DWP high rise building south of the studios, loss of outdoor filming areas, loss of light and ventilation, and the psychological impact on location managers due to passing trains. We are continuing to work with our staff on finding solutions to these problems as directed by your Board in August of 1993." (p. 6)

Response 2.2.2.12-10:

Impacts from the new DWP facilities should have been addressed in the environmental documentation for those facilities. For additional information on mitigation, see Responses 2.2.2.12-3 and 2.2.2.12-6. However, the scope of this SEIR is not intended to cover the Lacy Street Production Center.

Comment 2.2.2.12-11:

"SUMMARY AND CONCLUSIONS:

"A. Very significant, unavoidable, and cumulative impacts, particularly to the Lacy Street Production Center and the number of people employed in the center each year, should be recognized in this SEIR.

"B. Project objectives should be expanded in the Initial Study to include recognition of the importance of land use changes and impacts upon specialized facilities such as motion picture studios and older structures." (p.6)

Response 2.2.2.12-11:

As outlined previously, these concerns are outside the scope of this SEIR, and most impacts are either not significant or can be reduced to a level below significance by the implementation of the mitigation measures recommended in the FEIR (LACMTA, 1990). LACTC will continue to meet with representatives from Lacy Street Production Center to resolve their specific issues.

Comment 2.2.2.12-12:

"SUMMARY AND CONCLUSIONS...

"C. There are two essential tests that an SEIR must pass. It must focus upon substantial new information of importance to a project and it must include information necessary to make the previous EIR adequate for the project as revised [CEQA guidelines, Section 15163 (b)]. This SEIR does not appear to meet either of these tests as we understand the CEQA process and based upon the information we have previously provided to your office in this letter." (p.6)

Response 2.2.2.12-12:

The commentor is incorrect; the LACMTA believes that this SEIR does provide "information necessary to make the previous EIR adequate for the project as revised." The commentor may be confusing the requirements of a focused EIR with a Supplemental EIR, as described in previous Response 2.2.2.12-2.

Comment 2.2.2.12-13:

"SUMMARY AND CONCLUSIONS...

"D. Some references and footnotes are unclear and misleading. These need to be cleaned up and additional information provided in this SEIR if the document is to meet the test of adequacy and completeness.

"E. The need for recirculation of this SEIR appears to be necessary after revisions are made. We would like to have a copy of the recirculated document when it is available for public review." (p.7)

Response 2.2.2.12-13:

Some references and footnotes in the draft document may receive minor revisions in the final document. However, the commentor does not indicate which items are either unclear or misleading. The LACMTA maintains that this document contains information of sufficient depth and detail to allow for informed public review and decision-making by elected officials.

Comment 2.2.2.12-14:

"SUMMARY AND CONCLUSIONS...

"F. We have continually asked for Public notices. In December we did not receive notice that an SEIR was being prepared. Through other sources we found that the document had been prepared but it was late in arriving, and consequently our time to prepare comments was reduced. We went to the public meeting held in Highland Park in which the documents were to be presented but they were not available."

Response 2.2.2.12-14:

As stated in Response 2.2.2.12-4, the LACMTA considers its notification procedures adequate to meet CEQA requirements as they apply to this project. Additional notification required under city or due process will be made at the appropriate time(s). The proposed project modifications do not impact the alignment near Lacy Street Production Center. The public meeting attended by Lacy Street Production Center personnel was not associated with the CEQA/SEIR process. Documents were available at the public hearing (April 13, 1994) for the SEIR, as published in local newspapers.

Comment 2.2.2.12-15:

"The type of analysis required when an SEIR is prepared at the project level is necessarily more detailed and, in this case, requires higher levels of analysis. This can only be accomplished with adequate architectural and engineering studies running concurrently with work being undertaken by MTA/RCC." (p. 7)

Response 2.2.2.12-15:

The commentor statements are appropriate to a focused project EIR, but not to a Supplemental EIR. The latter document need only address those aspects of the project that have changed from previous environmental documents (in this case, the original FEIR and first SEIR). The level of detail is determined by the characteristics of the project changes, not the overall level of detail represented by the total project.

2.2.2.13 Letter from Sharon Lowe, Legal Aid Foundation of Los Angeles; May 9, 1994

Comment 2.2.2.13-1:

"Construction Air Quality Impacts: Demolition of Buildings.

The Draft SEIR discloses the potential exposure of the community to asbestos, however it is deficient in that it fails to disclose the even greater potential of exposure of the community to lead during the proposed demolition of subsequently acquired residential structures, particularly along the Marmion Way Corridor in the Highland Park community and the greater potential of fugitive contaminated lead dust particles therefrom. The residential structures proposed to be acquired and subsequently demolished are significantly older structures and have a high probability of lead-based paint throughout them. As a result of this failure, the Draft SEIR is inadequate in its failure to analyze the extent of this potentially significant environmental impact to the air quality and human health of the impacted communities or to propose any mitigations thereof.

Impacts Mitigated to Insignificance by Existing Regulations.

For the reasons stated above, the proposed mitigations are inadequate. The statement within the Draft SEIR that existing regulations render the environmental impacts insignificant is insulting and erroneous. The standard is reasonableness and regulations are generally construed as minimum standards to be applied. Reasonableness is to be determined as to the direct impact and application on the affected communities/residents/businesses.

Minimum standards for lead-based paint removal and encapsulation have been developed. However, the Draft SEIR is void of any information with regards to the various types of mitigation measures in relation to the removal of lead-based paint. Appropriately tailored analysis and application must be conducted based on the nature and demographics of the densely populated residential community of Highland Park. Reasonableness requires a specific mitigation monitoring implementation plan coordinated with the impacted communities which include but is not limited to the following elements of: community-based and culturally sensitive involvement through contacts with impacted communities' schools, preschools, churches, parks and recreation centers, senior centers; notice and dissemination of information to impacted communities in languages spoken, including but not limited to English, Spanish, Chinese, Vietnamese and Tagalog re: all findings relating to existence of lead and asbestos

and/or any other hazardous materials; schedule of demolition; potential and projected impacts on adjacent residents (health, access impacts, street closures, haul routes) specific types of mitigation measures such as twice daily water spraying; washing down of equipment, streets, hours of construction, etc; and joint development of a mitigation monitoring and implementation plan."

Response 2.2.2.13-1:

The LACMTA has already established procedures for assessing potential lead and asbestos contamination of houses to be demolished. These procedures are based on applicable local, regional (SCAQMD), state, and federal (NESHAPS) regulations, including sampling and removal protocols. These procedures, and the regulations upon which they are based, are designed to minimize human exposure to hazardous compounds such as lead and asbestos, particularly during the demolition of older residential structures where there is more likelihood of finding such materials. These regulations provide reasonable, practical, and cost effective methods of removing such hazardous materials, which is why it is especially important to note their contribution to maintaining public health and safety during demolition of older structures.

The LACMTA will add the following measure to the mitigation monitoring plan to identify its procedures for alleviating hazardous materials from structures to be demolished:

> "LACMTA's Construction Manager will ensure that all applicable safety regulations are followed relative to hazardous materials (e.g. removal, encapsulation, etc.) during demolition of older structures. The Construction Manager will prepare an annual report for review by the MTA/RCC Boards. Each Board will take appropriate action as needed to prevent unsafe exposure of the public to hazardous materials from its demolition activities."

Comment 2.2.2.13-2:

"Noise Mitigation

"Draft SEIR's discussion of proposed mitigation measures are inadequate in that it fails to address the potential of its proposed mitigations to create resultant and significant socio-economic environmental impacts in the form of community urban blight.

"The proposed noise mitigations of lower sound barrier walls and acquisition of noise easements could potentially result in the creation of community urban blight along the Marmion Way Corridor of Highland Park. The Draft SEIR is deficient of any analysis with regards to the potential long term socioeconomic impact of "prime target graffiti walls" along the entire length of the Marmion Way Corridor.

"No proposed mitigation measures and/or monitoring implementation maintenance plan exists in the Draft SEIR re: ongoing maintenance and/or landscape buffering of the negative visual aspects of the proposed sound barrier walls. Recommendation is made to consult and include

the Highland Park community's artist colony with regards to creative and collaborative maintenance mitigation measures.

"The Draft SEIR was also deficient of any analysis of long term real estate devaluation of properties on which noise easements are acquired and on adjacent properties as a result of the existence of such easements on their neighbors' properties. The Draft SEIR proposes compensation of current property owners, which is a bare minimum standard, however no mitigation is proposed or explored with regards to the long term land devaluation to the Highland Park community and the potential to create a blighted corridor along the length of Marmion Way.

"The Draft SEIR fails to analyze the most detrimental impact of its proposed noise mitigations in that they will create an entire corridor of residences along Marmion Way which are likely to become blighted in the near future. The value and desirability of the residences will further decrease as a result of the implementation of these proposed mitigation measures. Impacted property owners will be unmotivated to upkeep their properties, causing them to fall into disrepair. Thus, the proposed project has created an unmitigated significant environmental impact, i.e., urban blight.

"In the FEIR prepared and certified by the County of Los Angeles for its proposed LAC-USC Medical Center Replacement Project (April 12, 1994), the County clearly acknowledged that its proposed project would have an adverse socio-economic impact on "strip" residences adjacent to but not included within its project site and the remaining community as a result of the isolation and physical location next to a 3000 car eight-story parking structure.

"We recommend inclusion of analogous language in the Final SEIR with regards to LACMTA acknowledging the significant adverse impact on the remaining Marmion Way Corridor of Highland Park. As a separate but concurrent action with the certification of the Final SEIR and approval of the proposed project, we recommend that the LACMTA authorize a feasibility study be prepared to determine and assess the LACMTA's and the residents' joint options to prevent further adverse socio-economic impact to the Marmion Way Corridor of Highland Park such as blight, including but not limited to the exploration of acquisition and "park-like landscaped" open space re-use buffer zone and/or off-street parking for adjacent residents only.

"At the bare minimum, the Draft SEIR should conduct environmental analysis of the unmitigated blight that will be created by the implementation of the project's proposed noise mitigations. The proposed mitigation of such blight and its resultant socio-economic impact on the adjacent communities abutting the project must be identified."

Response 2.2.2.13-2:

The LACMTA has had several years of experience in creating transportation corridors in surrounding urban areas. In this time, the LACMTA has observed no evidence supporting the belief that its light rail corridors create urban blight. The addition of sound walls, or any type

of public wall or building, does increase the opportunity for graffiti. To date, the LACMTA has been very successful in controlling graffiti, even in areas that experience high crime and vandalism.

If the argument is accepted that sound walls do contribute to the creation of blighted corridors, lower or less extensive walls, as proposed in this SEIR, should produce comparatively less impacts than those walls proposed in the original EIR or the first SEIR.

In addition, houses located near new rail stations should actually appreciate in value due to the proximity to a valuable and convenient public improvement. The LACMTA maintains that neighborhood disinvestment is not a natural result of constructing sound walls, but is rather a consequence of neighborhood decline. In fact, many social observers have concluded that neighborhood decline is not necessarily a foregone consequence of neighborhood recycling, but is indicative of the type of neighborhood being studied. In other words, "stronger" neighborhoods can resist or even benefit by outside perturbations such as the addition of a public transit corridor, while "weaker" neighborhoods (i.e. those more susceptible to negative conditions) might succumb to this and other pressures to decline. The key is the condition of the neighborhood, which is more a function of the resolve, commitment, and attitudes of the local residents rather than on the physical conditions of structures (although outward appearances are often signs of local attitudes about the neighborhood).

For additional information on meeting community needs relative to the size and location of sound walls, please see the responses to comments from the City of South Pasadena (Section 2.2.2.8).

The LACMTA proposes the following measure be added to the mitigation monitoring plan to help prevent the creation of blighted urban corridors:

> "LACMTA will establish a program specifically for graffiti/tagging removal, installing landscaping on or along sound walls, and mural painting to create a more aesthetically pleasing urban environment. The LACMTA/RCC Boards will establish a fund for a two-year pilot project in this regard, and review its progress annually to determine if, or at what level, it will receive future funding. This program will be implemented by the LACMTA's Environmental Department which will prepare an annual report for review by the LACMTA/RCC Boards. The LACMTA will work with the artist colonies in Highland Park and elsewhere to identify the most appropriate locations for community murals to reduce the potential for graffiti or tagging."

***Comment 2.2.2.13-3*:**

"Total Parcel Acquisitions

"The statement within the Draft SEIR that existing regulations render the environmental impacts insignificant is insulting and erroneous. The standard is reasonableness and regulations are generally construed as minimum standards to be applied. Reasonableness is to

be determined as to the direct impact and application on the affected communities/residents/businesses.

"The Draft SEIR fails to provide any analysis of the significant environmental impacts on the City of Los Angeles' Housing Element Component of the City's General Plan. As of 1989, the City of Los Angeles had identified a need of 27,270 lower income dwelling units and had produced only 13,951 such units or 51%. (Local Progress in Meeting the Low Income Housing Challenge, California Coalition for Rural Housing, 1989). Furthermore, as of 1991, the City of Los Angeles was found by the State not to be in compliance with its own Housing Element.

"The Draft SEIR is further void of any analysis of the significant environmental impacts on the County of Los Angeles' Housing Element Component of the County's General Plan. As of 1989 the unincorporated portion of the County of Los Angeles had identified a need of 15,735 lower income dwelling units and had produced only 1,815 such units or a mere 12%. (Local Progress in Meeting the Low Income Housing Challenge, California Coalition for Rural Housing, 1989). The total Los Angeles County need for lower income dwelling units is 67,745 and as of 1989, only 22,425 (33%) such units have been produced throughout the county. (Local Progress in Meeting the Low Income Housing Challenge, California Coalition for Rural Housing, 1989).

"Therefore, the proposed elimination of an unidentified number of units of affordable housing is clearly a significant environmental impact on a worsening city-wide and county-wide affordable housing need, which the Draft SEIR has not only failed to analyze, but also fails to mitigate. In addition, the Draft SEIR fails to analyze the cumulative impact on the loss of housing by the proposed additional acquisitions with its existing proposed taking of residences in conjunction with the French Street Station and such projects as the County's proposed LAC-USC Medical Replacement Project which will result in the loss of 160 units and the displacement of 205 households.

"The proposed Draft SEIR proposes no mitigation and this fails to adequately address the need for replacement housing for the unidentified number of affordable housing units that will be destroyed, and the unidentified number of households that will be displaced.

"When a public entity displaces residents as a result of any displacing activity (demolition, rehabilitation, eminent domain, etc.), the public entity is required to provide those displaced persons with relocation assistance to assure that within a reasonable period of time, the displaced person is able to relocate to a "comparable replacement dwelling." (Gov. Code Section 7261). "Comparable replacement dwelling" is defined as

> ...any dwelling that is all of the following:
> (1) Decent, safe, and sanitary.
> (2) Adequate in size to accommodate the occupants.
> (3) In the case of a displaced person who is a renter, within the financial means of the displaced persons. A comparable replacement dwelling is within the financial means of

a displaced person if the monthly rental cost of the dwelling minus any replacement housing payment available to the person does not exceed 25 percent of the person's average monthly income.
(4) Comparable with respect to the number of rooms, habitable space, and type and quality of construction...
(5) in an area not subject to unreasonable adverse environmental conditions.
(6) in a location generally not less desirable than the location of the displaced persons dwelling with respect to public utilities, facilities, services, and the displaced person's place of employment. (Gov.Code Section 7260).

"However, where no comparable replacement dwelling is available to a displaced person, and the public entity determines that a comparable replacement dwelling cannot otherwise be provided, the public entity is responsible for providing a comparable replacement dwelling through "any action necessary or appropriate to provide the dwellings by use of funds authorized for the project." (Gov. Code Section 7264.5; see also 42 USC Section 4626, "such action as is necessary or appropriate to provide such housing by use of funds authorized for such project").

"The statutory directive in Government Code Section 7264.5 is supplemented by the California Administrative Code in that "no person shall be required to move from his dwelling...unless comparable replacement housing is available," and a public entity "may not proceed with any phase of a project ... or shall terminate or suspend further implementation of the project activities ... unless it provides such housing." (Cal. Admin.Code, tit 25, Section 6054).

"The Draft SEIR is void of any analysis of the volume and/or socio-economic make-up of the impacted households to be displaced by the proposed project. Thus no analysis exists as to whether or not "comparable replacement dwellings" are available. The Draft SEIR further fails to respond to this critical environmental impact with any proposed mitigation.

"Both the Federal and State replacement housing laws require that where the public entity taking housing units cannot locate comparable replacement dwellings for the displaced households, the public entity is required to provide dwellings for those households by any action which is necessary. (Gov.Code Section 7264.5; Cal. Admin. Code, Tit 25, Section 605; USC Section 4626; 49 Code of Federal Regulations, Section 24.404 (1992); McKenon v. Hastings College of Law 230 Cal.Rptr. 176, 186-87, 185 Cal.App.3e 896 (1986); Osburn v. Department of Transportation 270 Cal.Rptr. 761, 765, 221 Cal.App.3d 1347 (1990)).

"The Federal Code of Regulations lists several means by which the public entity can provide comparable replacement housing: 1) rehabilitation of and/or additions to an existing replacement dwelling, 2) construction of a new replacement dwelling, 3) relocation and, if necessary, rehabilitation of a dwelling, and 4) purchase of land and/or replacement dwelling by the displacing entity and subsequent sale or lease to, or exchange with a displaced household. (Code of Fed. Reg., Section 24.404(c)(1)).

"In such instances, precedence exists for the implementation of mitigation measures such as the creation of replacement housing trust funds to assist nonprofit developers to construct the actual replacement housing units of analogous type within the impact communities abutting the proposed project. The Century Freeway Expansion Housing Trust Fund is an example of such mitigation measures.

"Thus the final SEIR must include a plant for how the LACMTA will provide housing units for the number of households for which there is no available comparable replacement dwelling. This replacement housing plan must be done immediately so that the replacement housing is available prior to the dislocation of any household. Without such replacement housing being made available, the LACMTA cannot proceed with any part of the proposed project (Cal.Admin.Code, tit 25, Section 6054).

"In the instances where replacement housing units are identified, the Final SEIR must state such replacement housing meets the criteria set forth in Government Code Section 7260 (i) and 442 USC Section 4623(a)(1)(A) and 4624(2).

"The Final SEIR is deficient of any analysis as to the availability of comparable replacement dwellings for the rental and homeowner households that will be displaced by the project.

"*Draft SEIR is void of information indicating that the replacement dwellings are "decent, safe, and sanitary." (Gov.Code Section 7260(i)(1)).
*Draft SEIR is void of information indicating that the replacement dwellings are comparable "with respect to the habitable space, and the type and quality of construction." (Gov. Code Section 7260(i)(4)). A large majority of the displaced renter households will be displaced from dwellings which were single family residences.
*Draft SEIR is void of information indicating that the replacement dwellings are comparable with respect to location. (Gov.Code Section 7260(i)(6).

"The Final SEIR must include a comprehensive evaluation of available replacement housing. Without more specific information, the facts upon which the LACMTA is relying to document the availability of replacement housing is deficient under the law. (Keith v. Volpe)."

Response 2.2.2.13-3:

Despite the length and detail of the arguments offered by LAFLA, the discussion of property acquisition impacts in this document hinges on the requirements of CEQA versus those found in other parts of the California Government Code regarding relocation of residents displaced by condemnation procedures.

CEQA in fact does not require the depth or complexity of socioeconomic analyses argued by the commentor. However, local agencies are required to prepare relocation plans and programs to assess the economic conditions of those who may be relocated by agency activities. An agency pursuing relocation is required to meet a host of state and federal

housing requirements. The LACMTA has and will continue to comply with applicable regulations as part of its relocation activities.

The commentor has quoted and referred extensively from various state and federal housing relocation regulations. The LACMTA's actions in the past have been consistent with these regulations regarding the relocation of residents displaced by LACMTA projects. The LACMTA commits to meeting these and subsequent regulations in this regard on future projects.

There does not appear to be a present need to establish a separate housing trust fund within LACMTA as suggested by the commentor. The proposed project changes as addressed in this SEIR will only remove six additional units, which does not represent a significant impact on regional housing stock. Given current economic conditions, adequate replacement housing should be available in the immediate or surrounding area at comparable costs. However, the determination of unit availability, unit conditions (e.g. decent, safe, and sanitary), unit type, and location are part of the LACMTA relocation assistance process, and not the purview of this CEQA document.

The commentor is incorrect is asserting that the SEIR is deficient under state law because it does not include a "comprehensive evaluation of available replacement housing." The LACMTA maintains that the SEIR is adequate as it fulfills the requirements of CEQA.

Comment 2.2.2.13-4:

"On behalf of our clients, we strongly propose adoption and inclusion of language regarding the mitigation measures provided in the FEIR prepared and certified by the County of Los Angeles for its proposed LAC-USC Medical Center Replacement Project (April 12, 1994) [See pages 290-211 of FEIR and relevant responses to DEIR comments, State Clearing House No. 92101010]. The issues and concerns raised by the community in conjunction with that project are the same as those raised by our clients in connection with the LACMTA's proposed project. Thus the LACMTA should follow the lead of the County and adopt similarly and appropriately tailored mitigation measures to address community and impacted residents' concerns regarding displacee issues; relocation assistance issues; and one for one replacement housing needs issues as it relates to affordability, type (single family/homeownership) and physical location within the impacted communities.

"In adopting its proposed mitigation measures, the County acted in good faith to reflect the intent of the applicable laws governing relocation of displaced residents, i.e., to implement the legislature's attempt to render the adversely impact displaced residence "whole" again to as great an extent as is feasibly possible. To this end, the Final SEIR should include similar language which acknowledges the cumulative adverse environmental impact on the affordable housing needs of the Northeast communities through its displacement of households in the Highland Park community. The LACMTA should further acknowledge the severe hardship its project will have on these displaced residents, and therefore should include language within the Final SEIR of the intent of the LACMTA to adopt an adequate mitigation measure in the form of a Relocation Assistance Program Plan for the proposed project, which will be customized,

applied and implemented in a sensitive manner to render the residents as "whole as is feasibly possible" according to their individual needs and situations."

Response 2.2.2.13-4:

LACMTA staff have reviewed the analysis and mitigation measures referred to by the commentor in the LAC-USC EIR. The LACMTA maintains its relocation program fulfills the intent and requirements of state and federal housing regulations. A copy of the socioeconomic section from the LAC-USR EIR is included in this document for reference. It should be noted the data used in the LAC-USR EIR is applicable to the proposed project because the two projects are in the same geographic area. The LACMTA will continue to assist residents and businesses, as appropriate, as part of its rail construction projects. Due to current economic conditions and the small number of units to be demolished by this project, there is no need for LACMTA to initiate a program to create new affordable housing at this time.

The number of units proposed for removal is the minimum needed to achieve safe emergency access which will actually benefit the entire neighborhood. As stated previously, the LACMTA already operates a relocation assistance program for its projects, which will be sensitive to the relocation needs of affected residents.

Comment 2.2.2.13-5:

"Partial Parcel Acquisitions

"The Draft SEIR fails to analyze the cumulative impacts of its failure to mitigate the detrimental impact of creating an entire corridor of residences along Marmion Way which are likely to become blighted in the near future. The value and desirability of the residences will decrease further as a result of the implementation of these proposed mitigation measures. Impacted property owners will be unmotivated to upkeep their properties, causing them to fall into disrepair. Thus, the proposed project has created an unmitigated significant environmental impact, i.e., urban blight.

"The Draft SEIR is also deficient of any analysis of long term real estate devaluation of properties on which partial acquisition will occur and on adjacent properties as a result of the existence of the reduction of front or back yard areas, reduced vehicle access, and/or loss of parking. The Draft SEIR proposes compensation of current property owners, which is a bare minimum standard, however no mitigation is proposed or explored with regards to the long term land devaluation to the Highland Park community and the potential to create a blighted corridor along the length of Marmion Way.

"As stated in Section II above, we make reference to the FEIR prepared and certified by the County of Los Angeles for its proposed LAC-USC Medical Center Replacement Project (April 12, 1994), and propose the same recommendation as stated therein above."

Response 2.2.2.13-5:

The commentor assumes that the improvements proposed as part of this project will by themselves create blighted conditions along Marmion Way. In fact, the proposed improvements will likely benefit local residents by providing better emergency access, create a public transit station within the community that local residents can use, and incrementally improve the underutilized conditions that presently exist in the area. For additional information on the potential for the proposed project to create blight, see Responses 2.2.2.13-2 and 2.2.2.13-4.

Comment 2.2.2.13-6:

"Transportation and Circulation

"The draft SEIR fails to address the cumulative impact that the proposed five additional street closures and the partial parcel acquisitions will have on the on-street parking in the area. The impacted Highland Park community consists of older residential structures with limited to no off-street parking, and the loss of existing off-street parking will further exasperate this parking need. Thus, the Draft SEIR is deficient for its failure to provide or otherwise propose any mitigation measures for this negative environmental parking impact."

Response 2.2.2.13-6:

The traffic analysis in the SEIR indicates that traffic circulation conditions in the affected neighborhoods will actually improve as a result of the street closures. It is especially important to note that, with the planned increase in daily rail traffic in these areas, the street improvements planned along with the closures will improve overall safety and circulation.

Contrary to the assertion of the commentor, very little on-street parking will actually be lost as a result of the project. Six informal covered parking spaces will be lost along Marmion Way, but there is adequate on-street parking still available on Avenue 57 and along the south side of Marmion Way. Because the area to be lost is presently unimproved and the six parking structures mentioned above do not have building permits, this impact is not considered significant.

Comment 2.2.2.13-7:

"Human Health

"All of the concerns and comments stated above in Section 1 are incorporated by reference herein. Especially as they relate to the failure to address potential lead exposure during the construction/demolition of buildings phases."

Response 2.2.2.13-7:

For a discussion of hazardous materials related to demolition, see the previous Response 2.2.2.13-1.

Comment 2.2.2.13-8:

"Cumulative Impacts

"Concerns and comments regarding the cumulative impacts of the proposed project are stated above in Sections III and IV are incorporated herein by reference."

Response 2.2.2.13-8:

Section 2.3 in the DSEIR addresses cumulative impacts of the project. In addition, the previous responses to comments have addressed various cumulative impact topics, such as hazardous materials (2.2.2-13-1), neighborhood blight (2.2.2.13-2, -4, and -5), housing (2.2.2.13-3), and traffic (2.2.2.13-6). The previous EIR also examined the cumulative impacts of this and other related projects, as required by CEQA. The changes proposed in and analyzed by this SEIR do not change the previous analysis or conclusions regarding cumulative impacts of this project.

Comment 2.2.2.13-9:

"Conclusion

"For all the reasons stated above, the Draft SEIR is deficient in that it fails to adequately inform the public as to the extent and magnitude of the proposed project's negative environmental impacts and the reasonableness of the Draft SEIR's proposed mitigation measures. The public is thereby denied its mandated opportunity to adequately comment thereon."

Response 2.2.2.13-9:

The LACMTA maintains that this SEIR is adequate and fulfills its function under CEQA. It properly analyzes proposed changes to the original project, and proposes reasonable and feasible mitigation measures applicable to those changes. The LACMTA further maintains that the public has had adequate opportunity to review and comment on this SEIR.

2.2.2.14 Letter From T.A. Nelson, P.E., Consulting Engineer; May 2, 1994

Comment 2.2.2.14-1:

"Page 4-35 -- Sound levels along Marmion Way may not be intrusive to residents. A sound that is expected and occurs regularly, if not overly excessive, is often ignored. This has been my experience, having lived and attended school next to streets carrying electric interurban lines. Walls tend to divide communities; landscaping may be substituted. The lower sound level emitted by the new L.A. Standard LRVs may be acceptable without external mitigating measures."

Response 2.2.2.14-1:

The noise analysis in the SEIR identified 57 residences in the Mount Washington area, and 48 residences or buildings in South Pasadena, that may experience adverse noise impacts from the project. However, measures have been recommended in the SEIR which mitigate these impacts to the greatest extent feasible. Although it is possible that actual impacts may be less than expected, the noise analysis is based on accepted procedures which are used to provide a "worst case" estimate of potential impacts.

Comment 2.2.2.14-2:

"Page 4-58, 4.7.1.3 -- A drawing of the Marmion Way/Figueroa St. below-grade separation should be included with the Final SEIR."

Response 2.2.2.14-2:

See Figure 2-1 in Section 2.3 in this FSEIR.

Comment 2.2.2.14-3:

"Page 4-63, 4.7.3.3 -- Due to the nature of excavations, a below-grade separation at Figueroa/Marmion will have greater construction impacts than an aerial structure. Figueroa will probably be narrowed or detoured during construction."

Response 2.2.2.14-3:

Compared to an aerial structure, a below-grade separation would have greater construction impacts from excavation. However, impacts from constructing either structure would be temporary and are not considered significant. An aerial structure would also create adverse visual impacts in the surrounding community.

Comment 2.2.2.14-4:

"Based on preliminary drawings, it appears that residents southwest of French Ave. will lose direct access to Pasadena Ave. via French and will be required to use Ave. 37. This negative impacts may be considered mitigated by the improved access to an LRT station at French Ave. compared to the previously planned station location at Figueroa St. the realignment of Pasadena Ave. with Marmion Way at Figueroa does improve the street system."

Response 2.2.2.14-4:

As previously stated, construction of the Figueroa Street station will improve overall access in the immediate area. The closure of French Avenue is addressed in Section 2.3.6 of this FSEIR.

Comment 2.2.2.14-5:

"Page 4-82, 4.8.3.3 -- Criminal activity in the below-grade separation at Figueroa may be limited by strategically placed fencing and lighting. Monitoring may be possible from closed-circuit video cameras mounted either side of Avenue 37 and Figueroa, if they can be made theft proof."

Response 2.2.2.14-5:

All new LACMTA facilities, including the below-grade separation and stations, will be designed to limit unauthorized activities. The LACMTA will employ methods, designs and surveillance systems proven effective in previous applications, such as closed circuit TV and fencing.

Comment 2.2.2.14-6:

"In referring to utilities relocation, the most important entity was omitted, the Dept. of Water and Power. The Gas Co., Pac Tel, and TV cable company may be involved, also."

Response 2.2.2.14-6:

Comment noted. The appropriate public or private companies will be contacted regarding utility relocation, as required by state (CPUC) regulations and local (City of Los Angeles, etc.) regulations.

2.2.2.15 Letter from Sally Neubauer, Citizens Committee to Save Elysian Park; May 6, 1994

Comment 2.2.2.15-1:

"(In) the original EIR document, the Midway Yard was listed along with Taylor Yard and the Cornfield-Bullring Yard as a potential site for a maintenance facility, but in a subsequent paragraph was dismissed as being too small. Now MTA has decided to use the yard that is...too small..."

Response 2.2.2.15-1:

In the original EIR, the Midway Yard was proposed to be a full service maintenance facility. The current proposal is to use the Midway Yard only for storage, inspection, and light maintenance. The LACMTA has determined that this site is of sufficient size and shape for these purposes.

Comment 2.2.2.15-2:

"...MTA has decided...the yard...requires a secondary fire road that will cost $millions to build. Add to that that this fire road will both take park land with no compensation offered and permanently scar an Elysian Park hillside--all for a temporary facility...

"It would be a much better solution to realign the road down the natural draw which is what the Department of Water and Power (DWP) pump station road follows. When DWP completes construction of its new chlorination station, it will have no need for the old pump station building, and MTA could continue the road down into the yard through that site. This scenario would both save the hill and trees from destruction, as well as eliminate huge and unsightly retaining walls. Assuredly, it would also cost a fraction of the currently proposed overly engineered road."

Response 2.2.2.15-2:

The LACMTA has determined that the proposed road alignment is the most cost effective that meets both local fire access requirements and existing site constraints. As part of its planning design process, the LACMTA examined a variety of roadway alignments into Midway Yard, including extending the current road through the LADWP pump station as recommended by the Citizens Committee to Save Elysian Park (CCSEP). However, such an alignment is not feasible for several reasons. First, there is not enough room for a fire truck to turn north after reaching the bottom of the hill (called "touching down") due to the location of the railroad tracks. Second, the fire department requires two access points to the site, and a southern alignment would be considered an extension of Buena Vista Drive to the southeast. Third, the road must touch down to the north to directly serve the northern end of the planned yard building. Finally, the pump station contains a large foundation structure that is in the process of being removed but, at present, it would prevent extension of the existing pump station road. Although a southern alignment might cost less than a northern alignment, and would not impact the neighboring hillside, it did not meet engineering or fire access requirements and was therefore eliminated.

The proposed roadway and yard complex will be permanent LACMTA facilities. The roadway, as proposed, impacts a very small, isolated portion of the park (i.e. less than 3 acres of inaccessible slopes) while most of the road, including almost all of the retaining wall(s), is on LACMTA property. The LACMTA will apply to the City Parks Department and other city departments for the appropriate approvals in this regard. Use of this property would therefore not be considered a "taking" of valuable or useful parkland, and is in fact an appropriate use of this area given its location and historical use.

It should be noted that this roadway will primarily impact a small isolated "shoulder" slope that extends east from the higher, more prominent north-south trending ridge that forms the eastern border of the park. This slope is not visible from other park property, and the road would only be visible from isolated portions of State Highway 110 (Pasadena Freeway), and from some taller industrial buildings across the Los Angeles River. For these reasons, the LACMTA maintains that this impact is not significant. The LACMTA will meet with the CCSEP to discuss roadway modifications that reduce the size of retaining walls, or to install retaining structures that can be planted to reduce visual impacts.

Comment 2.2.2.15-3:

"The proposed retaining walls for this road are not 0-36' as indicated on Figure 3.3-6. Current plans call for walls on both the upper and lower banks of the road totaling up to 50' in height for as long as 280 feet."

Response 2.2.2.15-3:

Figure 3.3-6 notes that the "upper" (up slope or western) retaining wall will vary in height from zero feet high at the northern end where the road "touches down", to 36 feet high at the southern end where there is the most grade/elevation difference. It may have been more clear to add a second note that the "lower" (down slope) wall would be zero to approximately 14 feet high. The original note on Figure 3.3-6 applied to each slope. The CCSEP is correct that the cumulative height of the slope may exceed 50 feet, while the LACMTA note is correct in referring to the height of each individual slope.

Comment 2.2.2.15-4:

"...the road as planned would destroy a hilly nob in Elysian Park replete with mature trees. To state that 'No Impacts. . .will be significant. Therefore mitigation measures are not required.' (4.7.5.4) is ludicrous."

Response 2.2.2.15-4:

The proposed roadway will excavate a small portion of east-facing hillside not visible from the park, but it will not remove the hilly knob located further to the west that separates this slope from the developed park property to the west. The LACMTA maintains that this impact is not considered significant, but is willing to meet with representatives of CCSEP and the City Parks Department to consider a road design more sensitive to the natural contours and vegetation (see Response 2.2.2.15-2).

As stated by the CCSEP, construction of the proposed road may cause the removal of several (less than five) oak trees. While this potential impact is not considered significant, the LACMTA proposes to add the following measure to the mitigation monitoring plan:

> "The LACMTA will provide replacement trees of similar species at a 2:1 ratio for trees removed by construction of the access road into Midway Yard. The type and location of replacement trees will be coordinated with the CCSEP and the City Parks Department."

Comment 2.2.2.15-5:

"...taking park land is illegal per City Charter unless the taking agency bequeaths equal or greater acreage in the area as replacement park land...there must be additional landscape

mitigation for such an expanse of retaining wall and the mature trees lost must be replaced with an equal or greater amount of mature trees."

Response 2.2.2.15-5:

For information on the proposed roadway impacts on parkland, see Response 2.2.2.15-2. For information on impacts to trees, see Response 2.2.2.15-4.

Comment 2.2.2.15-6:

"...CCSEP fully expects MTA to commit to constructing a bike path from Taylor Yard into Elysian Park as mitigation. Before recent work involving new tracks and bridges for both the maintenance facility and Metrolink, uninterrupted access in the form of a crude path existed along the Los Angeles River from Barclay Street (where the current approved bike path ends) to Elysian Park via the Midway Yard. Because of rugged topography, the Buena Vista area of the park above Midway Yard is the only logical point to connect Elysian Park to the river bikeway which it is hoped will eventually extend to Long Beach. As a transportation agency, LACMTA has a responsibility to preserve this access."

Response 2.2.2.15-6:

Not related to mitigation for this SEIR, or previous EIRs, LACMTA has been working with Councilwoman Gloria Molina's office and Councilman Mike Hernandez's office regarding bicycle path access in this area. It is the LACMTA's understanding that such a trail would enter the Midway Yard site at the northern end, then proceed up the slope on Elysian Park land. The City's Bureau of Engineering is now estimating the cost of constructing a bicycle bridge west of this proposed trail to make it continuous through the park.

At this point, the LACMTA has agreed to allow construction of a bicycle trail across the northern corner of its Midway Yard property, but does not consider itself responsible for constructing a long segment of trail planned on City park property. The LACMTA will continue to meet with City officials and others on this issue.

2.2.2.16 Letter from Elizabeth J. Harris, Los Angeles Unified School District; May 9, 1994

Comment 2.2.2.16-1:

"The District's January 18, 1994 comments to the Notice of Preparation (NOP) asked that impacts of this project on students' safe pedestrian routes to school be considered in the SEIR. Not only did the SEIR not provide a plan of the proposed below-grade alignment at Marmion Way and Figueroa Street, it did not even mention that this alignment would involve closure of French Avenue to traffic, bicyclists, and pedestrians. We were not aware of this closure until yesterday when, in response to our request, we received the engineer drawings for the below-grade option. We noted that the station had been moved further to the north than was

indicated in the previous EIR, so that it partially blocked the intersection at French Avenue. We were told by Metropolitan Transportation Authority (MTA) staff that they recently determined that French Avenue would be closed.

"The importance of keeping French Avenue open for students is an issue which we addressed in our comments to the previous SEIR. The Final EIR of January 1993, in the Response to Comments section, stated that French Avenue will remain open. this is important because this route is used by a large number of students who attend Loreto School, as well as by students of other schools in the area. Loreto School in particular has perhaps 100 students who live on the east side of Figueroa Street and the tracks; many of these students walk or bicycle to school via French Avenue which is the most convenient and safest route. A crossing at Avenue 37, to the north of French Avenue, is not a good alternative. Nor is the pedestrian bridge over the Pasadena Freeway, just south of Loreto Street School, a good alternative pedestrian route because it is not considered safe by many in the community. It is imperative that the MTA maintain the crossings to vehicular, pedestrian and bicycle traffic at French Avenue.

"Please describe in detail the route that will be available over French Avenue to pedestrians, bicyclists, and vehicles.

"We have also been advised by MTA staff that it is possible that during construction, both French Avenue and Avenue 37 might be closed to vehicular, bicycle, and pedestrian traffic. If this should be the case, we ask that the MTA provide a shuttle bus to take students to and from school."

Response 2.2.2.16-1:

The Notice of Preparation for the SEIR indicated there would be no significant impacts to schools as a result of the proposed project. The LACMTA has reviewed this finding and still concurs that no significant adverse impacts are expected to school services from the project. As stated by the school district, French Avenue is regularly used as an at-grade railroad crossing by vehicles, bicycles, and pedestrians traveling to and from several local schools. The rail line recently experienced little rail traffic, and presently experiences no rail traffic, so access across the tracks at French Avenue is unimpeded by rail traffic. However, if this crossing were to be maintained after the proposed light rail project was implemented, significant safety impacts would occur.

The closing of French Avenue was proposed as part of this project as a result of physical restraints of the below-grade separation, and after in-depth examination of local vehicular and pedestrian circulation patterns, including "safe routes to schools" as maintained by the LADOT and the Los Angeles Unified School District (LAUSD). The French Avenue Station will be designed to preclude crossings of the tracks at this point to maintain safe emergency exit routes from the station, and to prevent potential conflicts between light rail vehicles and pedestrians.

This potential street closure was most recently examined in the "Traffic And Transportation Task 10 Report" prepared for the RCC in May of 1993. That report projected that roadway levels of service would be substantially improved as a result of the station and associated road improvements. The single most important improvement of this project, in terms of vehicular, bicycle, and pedestrian circulation is a grade-separated crossing at Avenue 37, just east of French Avenue. This plan would incrementally increase travel times (less than five minutes) for some pedestrians and bicyclists traveling to and from local schools. However, it would significantly improve local pedestrian and bicycle safety compared to maintaining an at-grade crossing at French Avenue given the increase in local train traffic. According to LAUSD's boundary map provided, only a few students would be impacted by French Avenue closure. The LACMTA therefore disagrees with the district's assertion that "...a crossing at Avenue 37...is not a good alternative" and that "French Avenue is the most convenient and safest route." While French Avenue may be more convenient and safe at the present because there is no train traffic, the LACMTA maintains that the improved safety of the new crossing is worth the trade off of a few minutes of convenience from the old crossing.

The LACMTA also examined a crossing at the Pasadena Freeway and constructing a pedestrian overcrossing at French Avenue. However, these were considered less safe and cost effective than the new proposed crossing at Avenue 37.

The new route for students traveling to and from local LAUSD schools would be to divert approximately 500 feet east of French Avenue to Avenue 37. While the present walking route may be shorter, the LAUSD is aware that the shortest route may not always be the safest route. The LACMTA believes this new route will improve overall safety for students traveling to and from local schools. Local "Safe Route to School" maps should be revised by LADOT the summer prior to implementation of the street closures with a note as to the changed routes.

Closure of both French Avenue and Avenue 37 would create serious access problems during construction for local LAUSD students. Therefore, the LACMTA will include the following measure in the mitigation monitoring plan to assure that simultaneous closure of French Avenue and Avenue 37 does not occur:

> "The LACMTA will plan and implement construction of the French Avenue Station and Marmion Way/Figueroa Street grade separation so that French Avenue and Avenue 37 are not closed at the same time. The Construction Manager of this project will discuss the construction schedule regularly with school and district officials, and notify them at least 48 hours in advance of foreseeable schedule changes regarding these two locations."

Comment 2.2.2.16-2:

"Despite our request in our letter of January 18, 1994, there is nothing in the DEIR to address the impacts that the project will have on students' safe pedestrian routes to school. The concerns of the District's Student Traffic and Safety Education Section are therefore resubmitted, and we ask that you address them in the Response to Comments Section of the Final SEIR."

Response 2.2.2.16-2:

The proposed closure of French Avenue and the planned improvements at Avenue 37 (including a grade-separated crossing) will improve pedestrian safety for LAUSD students walking or riding bicycles to and from school. They will also improve vehicular safety due to the potential conflicts of local traffic at French Avenue and the increased number of trains utilizing these tracks as a result of the project. For additional discussion of this issue, see Response 2.2.2.16-1 and the responses to comments by the LAUSD Student & Traffic Safety Education Section (Section 2.2.2.17).

Comment 2.2.216-3:

"Please provide a mitigation measure to ensure that the very successful 'School Safety Program' will continue to be provided to schools which are impacted by the Marmion Way street closures and light rail construction and operation."

Response 2.2.2.16-3:

The LACMTA has added the following measure to the mitigation monitoring plan to help reduce potential vehicular, bicycle, and pedestrian safety concerns:

> "LACMTA will sponsor the 'School Safety Program' at LAUSD schools affected by the street closures at French Avenue and the Marmion Way area. This program will be offered by the LACMTA's Public Affairs Office during construction and pre-operation phases of the project."

Comment 2.2.2.16-4:

"It is particularly important that a mitigation measure be added to ensure that school principals be provided adequate notice of street closures and of construction that may interfere with the established student pedestrian routes."

Response 2.2.2.16-4:

The LACMTA proposes the following measure be added to the mitigation monitoring plan to help coordinate street closures and construction activities:

"LACMTA's Construction Manager will regularly review construction schedules and planned street closures with school and LAUSD personnel. The Construction Manager will contact officials at least 48 hours prior to any planned activity that could impede local vehicle, bicycle, or pedestrian circulation."

Comment 2.2.2.16-5:

"In regards to our response to the NOP that impacts on Arroyo Seco School be further analyzed, we have been advised by MTA staff that the SEIR did not analyze these impacts because the project description did not include changes made in the area of the Arroyo Seco School; the alignment segments weren't re-analyzed there because there were no street closures, nor was there a need to reduce the height of the soundwall because there were no visual obstructions to train operators, pedestrians, or motorists in these areas.

"Are we therefore correct in understanding that the January 1993 Final EIR, together with the mitigation measures described therein and incorporated into the Mitigation Monitoring Program, is valid as it pertains to the Light Rail project in the vicinity of Arroyo Seco School? In particular, do the noise mitigation measures which were added to the Final EIR in January 1993 remain unchanged?"

Response 2.2.2.16-5:

The commentor is correct; all previously approved mitigation measures will be enforced unless supplanted or modified by measures in this SEIR's Mitigation Monitoring Plan. Please see Section 4.3.8.5 for documentation listing the improvements that are proposed near Arroyo Seco Alternative Magnet School.

Comment 2.2.2.16-6:

"Please provide a plan of the construction staging areas, and the extent of the construction in relation to Loreto School and Hillside School. Please identify the haul routes, and the frequency of the haul trucks. We understand the construction phase may last for seventeen months. If these trucks pass schools, please either quantify the noise and air impacts, or provide a mitigation measure that these trucks will not pass by schools during school hours."

Response 2.2.2.16-6:

A plan of construction staging areas for the project is not available yet, but will be available in the "Worksite Traffic Control Plan" required by City of Los Angeles' Department of Transportation (LADOT). These plans will be made available to affected local schools and LAUSD officials at least 30 days before the start of construction. The excavation/hauling phase of construction is expected to last 8.5 months.

Haul routes will depend on the final locations of work storage and stockpiling areas, which are not available as yet. However, local haul routes have already been designated by the City and are generally oriented away from sensitive land uses such as schools.

2.2.2.17 Attachment from School Traffic and Safety Education Section; November 24, 1993

Comment 2.2.2.17-1:

"Closure of Avenues 51, 53, 55, and 61 (south of Figueroa Street) across the railroad right-of-way appear to impact the integrity of the current Pedestrian Routes Map for students attending the following schools: Aldama School (Avenue 51); Monte Vista School (Avenue 53); Monte Vista School (Avenue 55); and Garvanza School (Avenue 61). A study must be made to identify alternate safe and convenient pedestrian routes. DOT will need to revise current map to reflect any changes."

Response 2.2.2.17-1:

Pedestrian Route Maps for these schools will have to be changed, however, these changes are not necessarily considered significant or even adverse. Various street improvements are planned, and pedestrian access will be maintained within the area which will actually improve overall pedestrian safety. This is especially true considering the planned increase in the number of trains that will utilize this corridor daily. Changing pedestrian routes to schools does not necessarily require a specific study; these maps are subject to periodic revision as a result of new development or street changes not associated with rail projects. With respect to Garvanza School, it is not located near the rail alignment and its access will not be impacted as a result of the proposed street closures.

Comment 2.2.2.17-2:

"It is imperative that METRO provide at no charge to the school district an instructional rail safety program and materials to all affected elementary and middle schools."

Response 2.2.2.17-2:

As outlined in Response 2.2.2.16-3 of the letter from Elizabeth J. Harris (Los Angeles Unified School District) above, the LACMTA sponsors the "School Safety Program" at LAUSD schools. This program will be offered by the LACMTA's Public Affairs Office during construction and pre-operation phases of the project.

Comment 2.2.2.17-3:

"School Transportation must be contacted regarding the potential impact, if any, upon existing school bus routes."

Response 2.2.2.17-3:

The LACMTA has added the following measure to the mitigation monitoring plan to help coordinate its activities with LAUSD bus routes and operation:

> "LACMTA's Construction Manager will regularly review construction schedules and planned street closures with LAUSD School Transportation personnel. The Construction Manager will contact officials at least 48 hours prior to any planned activity that could impede local bus circulation."

Comment 2.2.2.17-4:

"Contractors must guarantee that safe and convenient school pedestrian routes are maintained. Contractors must maintain ongoing communication with administrators at impacted school sites providing sufficient notice to forewarn children and parents when currently existing school pedestrian routes will be impacted."

Response 2.2.2.17-4:

The LACMTA has proposed measures to coordinate its activities with local school, district, and transportation personnel (see Responses 2.2.2.16-3 and -4 of the letter from Elizabeth J. Harris, Los Angeles Unified School District) for details of these additional mitigation measures. [Also see Mitigation Monitoring Plan prepared for this SEIR (May 1994).]

Comment 2.2.2.17-5:

"Appropriate traffic controls (signs and signals) including automatic crossing gates and warning signals, must be installed as needed to ensure pedestrian and vehicular safety."

Response 2.2.2.17-5:

The LACMTA will install such controls according to federal, state, and its own safety guidelines, as appropriate, to ensure vehicular and pedestrian safety. LACMTA's commitment to do so is included throughout the DSEIR, incorporated herein by reference.

Comment 2.2.2.17-6:

"Construction scheduling should be sequenced to minimize conflicts with pedestrians, school buses and cars."

Response 2.2.2.17-6:

In addition to coordinating street closures and other project activity with local schools and LAUSD personnel, the LACMTA will schedule and carry out construction to minimize such

conflicts to the greatest degree practical. The measures outlined above in 2.2.2.16-1, -3, and -4 will help minimize potential conflicts.

Comment 2.2.2.17-7:

"Funding for crossing guards to be provided when safety of children compromised by construction related activities at impacted crossings.

"Funding for a flag person to be provided as needed where construction related activities compromise the safety of pedestrians and/or motorists while traveling to and from school."

Response 2.2.2.17-7:

The LACMTA proposes the following measure be added to the mitigation monitoring plan to help coordinate its activities with LAUSD bus routes and operation:

> "LACMTA's Construction Manager will ensure that safe crossings and/or personnel are provided to help school children cross streets or construction areas where needed. Such arrangements will be coordinated with local school and LAUSD officials."

Comment 2.2.2.17-8:

"Pedestrian right-of-way near rail line must be clearly marked to minimize trespassing, vandalism, and short-out attractions...Barriers must be constructed as needed to minimize trespassing, vandalism, and short-out attractions...Fencing should be installed to secure construction equipment to minimize trespassing, vandalism and short-out attractions."

Response 2.2.2.17-8:

Pedestrian access points along LACMTA rights of way will be clearly marked. LACMTA facilities and equipment are designed to minimize or resist vandalism. Barriers and other structures will be used to limit access to the LACMTA rights-of-way to prevent trespassing and attracting short-outs.

Comment 2.2.2.17-9:

"Security patrols should be funded and provided to minimize trespassing and short-out attractions."

Response 2.2.2.17-9:

The LACMTA maintains its own security force. Along LACMTA rights-of-way and at LACMTA stations, it is the security personnel's primary function to minimize trespassing (including short-out attractions).

2.2.2.18 Memorandum from Janice Sawyer, Los Angeles Unified School District, Environmental Health and Safety Branch; May 2, 1994

Comment 2.2.2.18-1:

"It is staff's recommendations that the criterion from allowable groundborne vibration levels be decreased from 75 (dB) to 70 (dB) at schools, and any mitigation measures be adjusted accordingly."

Response 2.2.2.18-1:

The LACMTA has chosen noise and vibration criteria consistent with large metropolitan areas throughout the country, and which are consistent with state and federal agencies responsible for regulating these environmental impacts. The LACMTA maintains that these lower standards do not produce health or environmental benefits that justify their additional cost.

Comment 2.2.2.18-2:

"The Design Criteria indicate a maximum allowable level of 75 to 85 dBA for sensitive receptors, depending on existing use along the segments of the alignment. These levels are unacceptable and conflict with District noise standards (67 Leq for exterior noise and 52 Leq for interior noise). The criteria should be adjusted to be within levels acceptable to the District."

Response 2.2.2.18-2:

As with the response to comment 2.2.2.18-1, the LACMTA noise and vibration standards are consistent with applicable state and federal guidelines for large urbanized areas. With due respect to the District's position, it is the LACMTA's conclusion that the lower standards are not justified based on cost of implementation versus the potential health and environmental benefits.

Comment 2.2.2.18-3:

"The details regarding the below-grade segment is unclear. The location of the segment, haul routes, construction staging areas were not defined. Without clarification, the impact to adjacent schools cannot be ascertained."

Response 2.2.2.18-3:

The LAUSD memo does not indicate which below grade segment is of concern, but the district was provided with complete copies of the proposed project improvements during the DSEIR review period.

As previously stated, construction staging areas have not yet been finalized, but copies of the "Worksite Traffic Control Plan," as required by LADOT, will be provided to local school and LAUSD personnel prior to the start of construction. City-wide haul routes have been designated by LADOT, but specific routes for this project have not been selected. However, city routes are generally selected so they will not impact sensitive land uses such as schools.

Please also see Response 2.2.2.16-6, above.

2.2.2.19 Letter from Cliff Benedict, Neighborhood Information Network, Pasadena; April 21, 1994

Comment 2.2.2.19-1:

"We do not agree with your conclusion (Table 2.2-1 on page 2-5) that the Transportation and Circulation problems are *"Not significant"*. We believe they are *quite significant!*...Bottom line is that we request you consider further mitigation measures to reduce the LoS impact on the two LoS level E and one level F (after mitigation) intersections. Consideration might be given to the following: the elimination of pedestrian cross traffic at these intersections by providing either overhead or underground pedestrian crossings; provision of overhead or underground auto passes for through traffic utilization of counterflow traffic lanes depending on the time of day and traffic direction; a portion of Foothill Blvd. has an unused median that could be placed in service as well as Rosemead Blvd. south of Colorado."

Response 2.2.2.19-1:

Your suggestions will be considered; however, it is not likely that pedestrian or auto grade separations, and counter-flow would be built due to generally higher costs of these alternatives. Regarding the specific intersections, the two intersections at LoS Level E and the one at LoS F must be considered relative to background traffic projected to the year 2010 ("2010 Cumulative" in DSEIR Table 4.7-3). Please see Response 2.2.1.2-2; according to CEQA guidelines, no significant impacts would occur to these intersections.

Comment 2.2.2.19-2:

"We are concerned that the anticipated level of CO emissions at peak ambient 8-hour average concentrations at the Sierra Madre Station Park and Ride facility are approaching the danger level. The stated figures (page 4-20) of 8.8 ppm is really too close to California Standards 8-hour level of 9.0 ppm. A slight error in calculation of the amount of anticipated traffic could easily create a situation where the 9.0 ppm level would be exceeded. How do you mitigate this potential problem?"

Response 2.2.2.19-2:

The CO emission rate of 8.8 ppm was a conservative calculation based on a worst-case scenario. The actual CO emission rate for the Sierra Madre Villa Park and Ride Facility is expected to be

less than 8.8 ppm, in spite of variability in anticipated traffic. Therefore, it is unlikely that the 9.0 ppm would be exceeded and the facility is not in danger of violating California state standards.

Comment 2.2.2.19-3:

"...Your description of the proposed station on page 4-19 does not agree with a proposed parking site plan (attached) that I obtained this week from the City of Pasadena which was not a part of this SEIR. Further, the parking site plan included property at the corner of Halstead and Foothill that is not a part of the Johnson & Johnson facility...Consideration should be given to reconfiguration of the site to accommodate 1,000 vehicles."

Response 2.2.2.19-3:

Please see Section 2.3 for a revised drawing of the Johnson & Johnson/Merck alternate Park and Ride facility. The drawing indicates that the entire property, except for the Southern California Edison Company substation, would be taken for the Park and Ride facility, which would accommodate 1,000 vehicles. (Also see Sections 2.2.2.3 through 2.2.2.7 for responses from the City of Pasadena's comments on the Park and Ride facility.

2.2.2.20 Letter from Susan Mossman, Pasadena Heritage; May 7, 1994

Comment 2.2.2.20-1:

"Table 2.2-1
The Johnson & Johnson/Merck facility has been determined by the City of Pasadena Cultural Heritage Commission to meet the criteria for an "Historic Treasure," the highest landmark designation in the City of Pasadena. Two landmark nominations (City and National Register of Historic Places) are pending, as stated in the document.

The loss of this building is recognized in the document as a significant negative impact with mitigation required. Documentation of the building is not acceptable mitigation under CEQA.

Section 2.4
The demolition of the Johnson & Johnson/Merck building is a controversial issue and needs to be resolved...

Section 4.10.3
The statement is made that "If the Johnson and Johnson/Merck site is selected...all of the buildings and structures would be subject to demolition. Demolition of any structure at the site nominated for listing in the National Register of Historic Places would result in a significant adverse impact to a cultural resource." The DSEIR recognizes that the building should be treated as eligible for the National Register."

Response 2.2.2.20-1:

For information on the Johnson/Merck facility lease, see various responses to comments from the City of Pasadena in Sections 2.2.2.3 through 2.2.2.7.

Comment 2.2.2.20-2:

"Section 4.10.1
The description of the site and its significance is adequate. Please note that on page 4-90, second line, Pasadena Heritage is the complete name of the organization (a private non-profit organization). The word "commission" should be deleted."

Response 2.2.2.20-2:

Comment noted. The word "commission is not applicable.

Comment 2.2.2.20-3:

"Alternatives to demolition which would mitigate this significant adverse impact should be presented as part of this document. (While recordation may be part of the process, it is not mitigation and does not reduce the negative impact to zero.)

Alternatives should include, but not be limited to:

> Developing a reuse alternative for the historic building which could meet needs of the agency and using the rest of the site as the Park and Ride facility.
>
> Using that portion of the site which is vacant or currently has nonsignificant buildings for the Park and Ride facility and leasing the building.
>
> Entering into a joint development agreement with another agency or private party to reuse the building and construct the parking jointly.
>
> Seeking a subdivision of the property and purchasing the southern portion of the property only."

Response 2.2.2.20-3:

See response 2.2.2.19-1, above.

Comment 2.2.2.20-4:

"What changes in circulation plans would be indicated if the building were preserved or reused? What would the relative costs and savings be for each alternative?"

Response 2.2.2.20-4:

See Response 2.2.2.19-1, above.

Comment 2.2.2.20-5:

"With regard to the 106 process, how is the treatment of historic properties addressed in the Memorandum of Agreement, Programmatic Agreement or Memorandum of Understanding signed by the MTA, ACHP and FHA and the SHPO?"

Response 2.2.2.20-5:

LACMTA will pursue the appropriate agency agreements during the project design phase, including consultation with the City of Pasadena regarding the structures at the Johnson & Johnson/Merck site.

Comment 2.2.2.20-6:

"If there are interested parties concerned with the preservation of the cultural resources, must not consideration be given to the preservation of the significant structure? "

Response 2.2.2.20-6:

Please see various responses to comments from the City of Pasadena, Sections 2.2.2.3 through 2.2.2.7.

2.2.2.21 Transmittal from John W. Caldwell, John Caldwell Design; April 12, 1994

Comment 2.2.2.21-1:

"My concern is parking. The last few years parking availability on El Centro has diminished; now, it is almost non-existent. Therefore, the Park and Ride locations that are being considered i the area are a must...I have suggested to Bill Campbell of the South Pasadena Planning Department and now to your office, that there be no parking between 6:00 A.M. and 9 A.M. Monday through Friday in the area surrounding the Light Rail station."

Response 2.2.2.21-1:

The project modifications addressed in this SEIR did not include LRT parking for South Pasadena. Traffic and parking for South Pasadena was addressed in the Final EIR for the project (LACTC, 1990). The public comment period for the Final EIR was closed in 1990, according to California Environmental Quality Act (CEQA) Guidelines. Nonetheless, your comment has been noted.

2.2.2.22 Letter from George W. Sabin, April 21, 1994

Comment 2.2.2.22-1:

"Please do not consider the new Orchard Hardware Supply property located at 3425 E. Colorado Blvd. in East Pasadena for the proposed light rail trolley stop...Why were they permitted to spend large sums preparing the site for the new store if this was in your plans? Johnson/Merck on E. Foothill has been vacant for a long time and Kodak Datatape is also available."

Response 2.2.2.22-1:

Your comment has been noted. The property presently occupied by Orchard Hardware Supply is being considered as an alternative location for the Sierra Madre Villa Park and Ride facility when the property was occupied by Builders Emporium. Builders Emporium and the City of Pasadena were aware of LACMTA's intentions to include the site in its Park and Ride analysis. Other sites that were suitable for the Park and Ride facility were also analyzed, including the Johnson & Johnson/Merck site, as suggested in your comment.

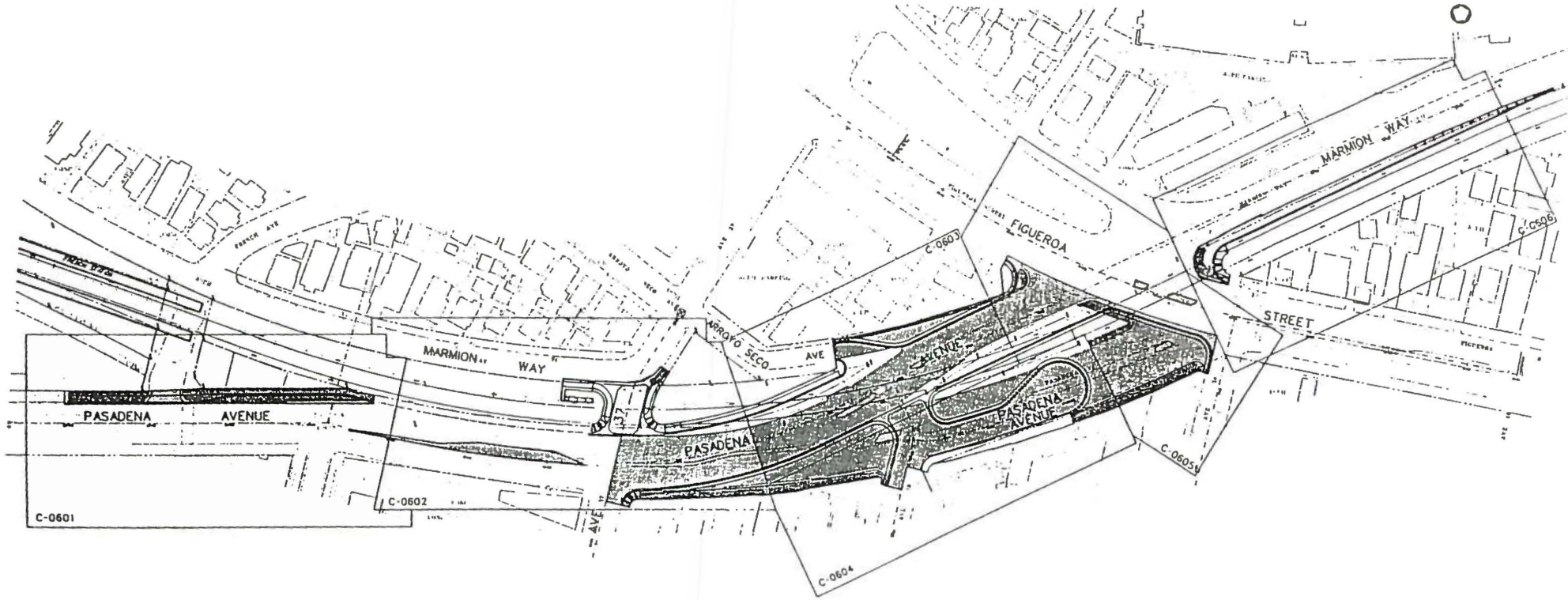

FIGURE 2-1 MARMION WAY/FIGUEROA STREET BELOW-GRADE SEPARATION

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2.3 CORRECTIONS AND ADDITIONS

2.3.1 Air Quality

Figures 4.2-1 and 4.2-2 (pages 4-7 and 4-8) are incorrectly labeled. The figure titles should be reversed to match the correct figures.

2.3.2 Marmion Way/Figueroa Street Below-Grade Separation

The below-grade site plan proposed for construction in the vicinity of Marmion Way and Figueroa Street is presented on Figure 2-1.

2.3.3 Marmion Way Property Acquisitions

The DSEIR identified the need for approximately 50 curb cuts and 6 full parcel takes along the Marmion Way corridor in Highland Park. Ten buildings located on the 6 parcel takes would be demolished. It may become necessary to add or delete structures proposed for demolition as the project progresses toward completion. Proper CEQA documentation and analysis would be completed should candidate buildings be determined to be of historic or other significance. LACMTA will communicate with local officials regarding changes to parcel takes.

2.3.4 Sierra Madre Villa (Pasadena) Park and Ride Facility Alternatives

The revised drawing for the Johnson & Johnson/Merck Park and Ride alternative for the Sierra Madre Villa Station in east Pasadena is presented on Figure 2-2.

2.3.5 Arroyo Seco Bridge Archaeological Inventory

Subsequent to the distribution of the DSEIR for public/agency review, the records search for the Arroyo Seco Bridge was received from the Archaeological Information Center, UCLA Institute of Archaeology. The results of the records search, including a site defined as approximately one-half mile in radius around the bridge, are:

- No historic or prehistoric sites have been identified within the site;
- The National Register of Historic Places and the California State Historic Resources Inventory list no properties within the site; and
- The California Historical Landmarks (1990) of the Office of Historic Preservation, California Department of Parks and Recreation, indicate that there are no California Historical Landmarks within the site.

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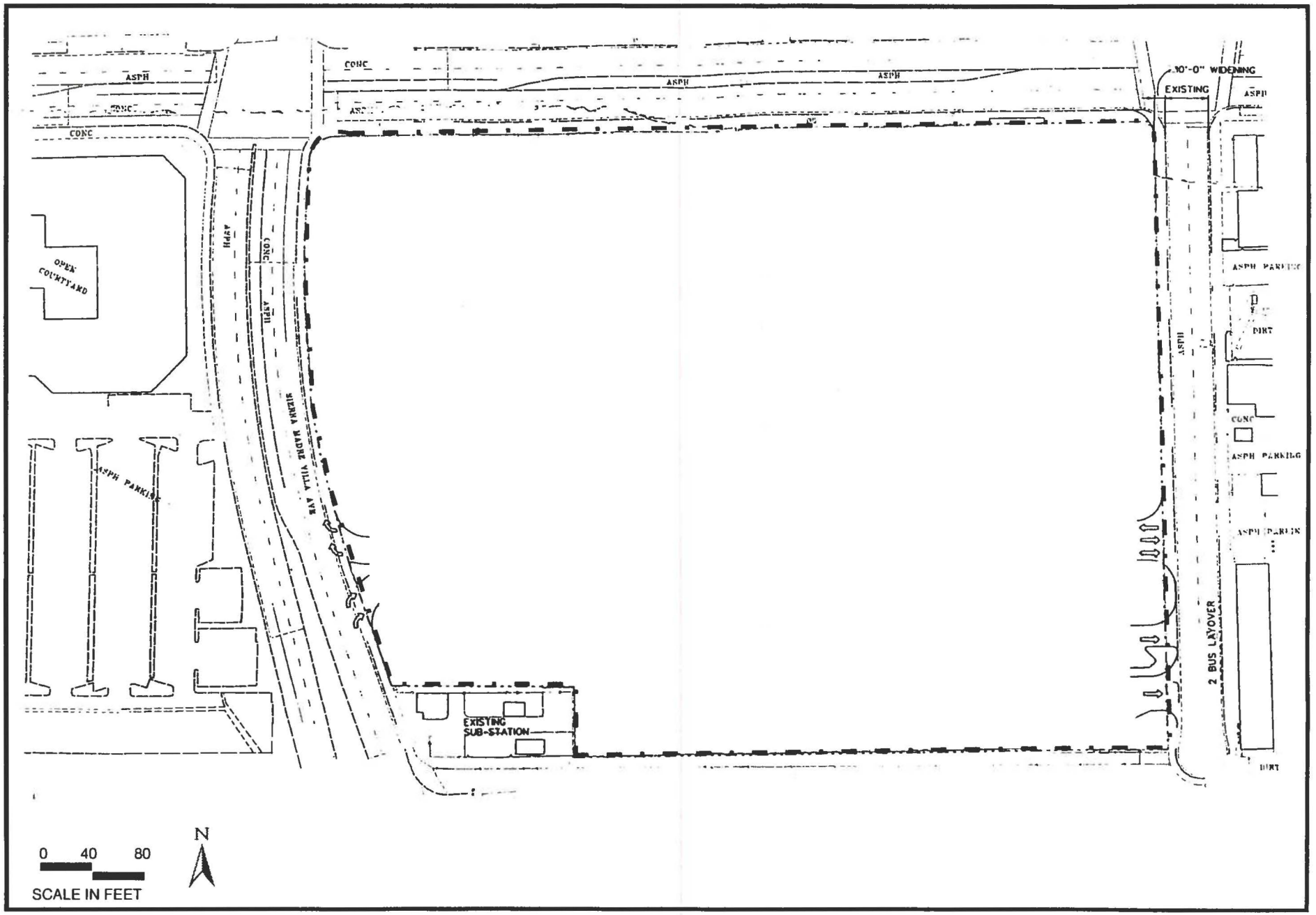


FIGURE 2-2 JOHNSON & JOHNSON/MERCK PARK AND RIDE ALTERNATIVE, EAST PASADENA

2.3.6 French Avenue Crossing

The alternative to construct a below-grade separation at Marmion Way and Figueroa Street has necessitated the closure of French Avenue to pedestrian and vehicular traffic. A pedestrian crossing will be provided for at Avenue 37.

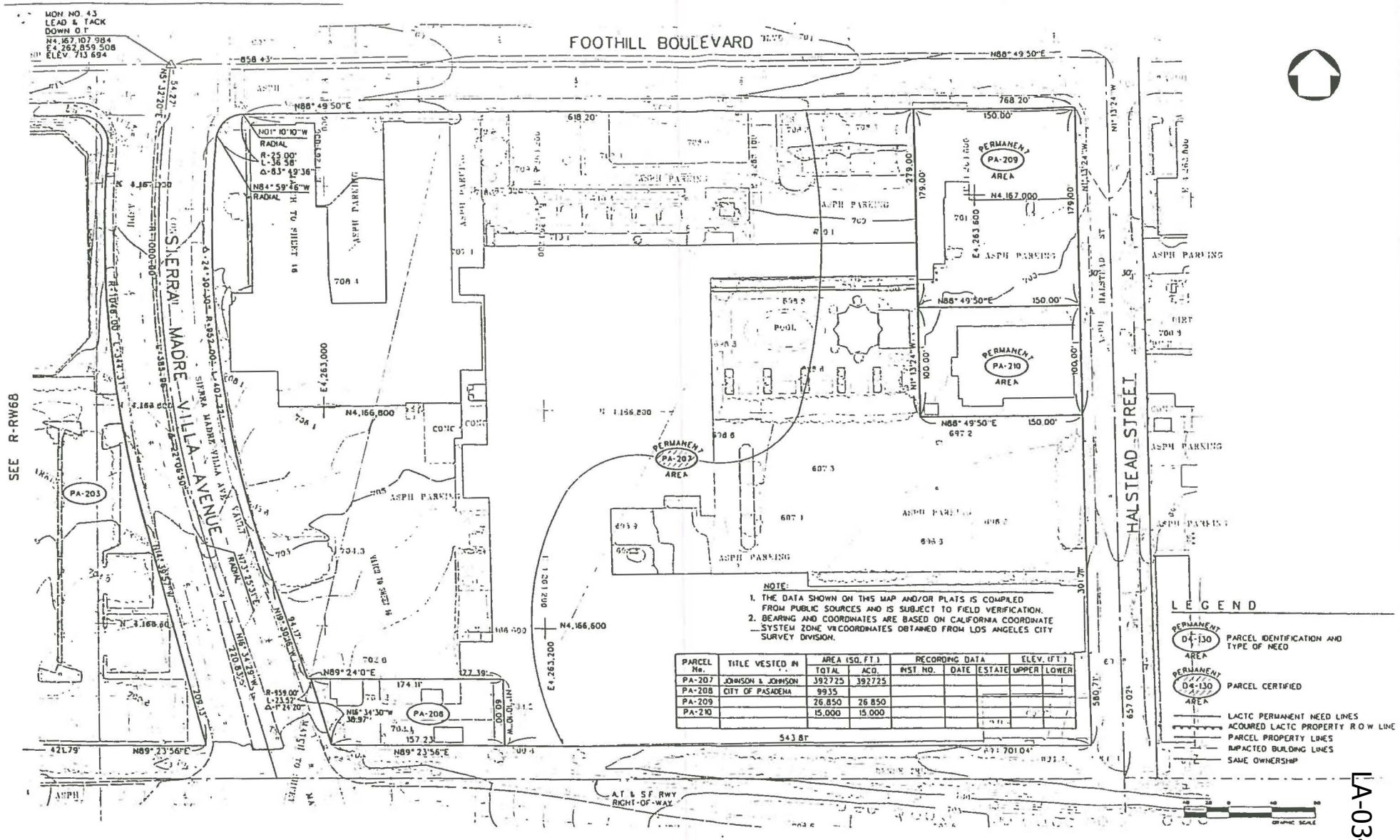
2.3.7 Acquisition of Two Parcels

Two additional parcels, PA-209 and -210, are proposed for acquisition. They are located on the west side of Halstead Street at Foothill Boulevard (Figure 2-3). In order to reduce traffic impacts along Halstead Street, it is proposed that Halstead Street be widened south of Foothill Boulevard. It would be necessary to demolish the buildings on parcels PA-209 and -210 to accommodate the street widening. The properties would also be used as part of the alternative Johnson & Johnson/Merck Park and Ride site. The businesses occupying the buildings on the two parcels would need to be relocated, but the action will not result in significant impacts to the community.

2.3.8 Supporting Documentation

Documentation in support of the DSEIR (LACMTA, 1994b) is presented on the following pages. A list of the documentation is as follows:

- Air Quality Calculations
- MTA Systemwide Criteria, Section 2.8.9, Construction Noise and Vibration Control
- Evaluation of Change in Noise Impacts, Proposed Blue Line Wayside Horn System
- Changes to Transportation/Circulation Section
- LRT Improvements Near Arroyo Seco Alternative Magnet School, LAUSD



PARCEL No.	TITLE VESTED IN	AREA (SQ. FT.) TOTAL	AREA (SQ. FT.) ACQ.	RECORDING DATA INST. NO.	DATE	ESTATE	ELEV. (FT.) UPPER	ELEV. (FT.) LOWER
PA-207	JOHNSON & JOHNSON	392725	392725					
PA-208	CITY OF PASADENA	9935						
PA-209		26,850	26,850					
PA-210		15,000	15,000					

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FIGURE 2-3 PARCELS PA-209 and PA-210

2.3.8.1 Air Quality Calculations

REVISION 0, MARCH 25, 1994
PM_{10} EMISSIONS FROM DEMOLITION OF ALTERNATE PARK AND RIDE SITES

CALCULATION OF EMISSIONS

$$E = \frac{0.00042 \text{lbs } PM_{10}/ft^3 \times V}{Q}$$

Where:

E	=	PM_{10} emissions in lb/day
0.0042	=	emission factor for building demolition
V	=	building volume (ft^3)
Q	=	number of days to demolish building(s)

JOHNSON & JOHNSON/MERCK SITE

Building 1	10,000 ft^2 x 10 ft	=	100,000 ft^3
Building 2	10,000 ft^2 x 20 ft	=	200,000 ft^3
Building 3	13,500 ft^2 x 10 ft	=	135,000 ft^3
Building 5	30,000 ft^2 x 10 ft	=	300,000 ft^3
Building 6	30,000 ft^2 x 10 ft	=	300,000 ft^3
Building 7	25,000 ft^2 x 20 ft	=	500,000 ft^3
Building 8	6,800 ft^2 x 20 ft	=	68,000 ft^3
	TOTAL	=	1,603,000 ft^3

$$\frac{0.00042 \times 1{,}603{,}000 \text{ ft}^3}{10} = 67.32 \text{ lb/day}$$

BUILDERS EMPORIUM SITE

287 ft x 155 ft x 20 ft = 889,700 ft^3

$$\frac{0.00042 \times 889{,}700}{5} = 74.73 \text{ lbs/day}$$

REVISION 1, MAY 9, 1994
PM_{10} EMISSIONS FROM DEMOLITION OF ALTERNATE PARK AND RIDE SITES

CALCULATION OF EMISSIONS

$$E = \frac{0.00042 \text{lbs } PM_{10}/ft^3 \times V}{Q}$$

Where:

E	=	PM_{10} emissions in lb/day
0.0042	=	Emission factor for building demolition
V	=	Building volume (ft^3)
Q	=	Number of days to demolish building(s)

JOHNSON & JOHNSON/MERCK SITE

Building 1	10,000 ft^2 x 10 ft =	100,000 ft^3
Building 2	10,000 ft^2 x 20 ft =	200,000 ft^3
Building 3	13,500 ft^2 x 10 ft =	135,000 ft^3
Building 4	46,350 ft^2 x 20 ft =	871,200 ft^3
Building 5	30,000 ft^2 x 10 ft =	300,000 ft^3
Building 6	30,000 ft^2 x 10 ft =	300,000 ft^3
Building 7	25,000 ft^2 x 20 ft =	500,000 ft^3
Building 8	6,800 ft^2 x 10 ft =	68,000 ft^3
Misc. Office Space	11,000 ft^2 x 10 ft =	110,000 ft^3
Converse Envirolab	11,000 ft^2 x 10 ft =	110,000 ft^3
	total	2,694,200 ft^3

$$E = \frac{0.00042 \text{ lbs } PM10/ft^3 \times V ft^3}{Q}$$

$$E = \frac{0.00042 \text{ lbs} \times 2{,}694{,}200}{13} = 87.04 \text{ lbs. of } PM_{10} \text{ per day}$$

BUILDERS EMPORIUM

No change

PHASE 1
FUGITIVE DUST PM_{10} CALCULATIONS
EARTH MOVING OR BULLDOZING OPERATIONS

$$E = \frac{0.45 \times (G)^{1.5}}{(H)^{1.4}} \times I \times J$$

Where:

E = PM_{10} emissions from earth moving (lb/day)

G = Silt content of aggregate (%) = 7.5

H = Moisture content of surface material (%) = 2.0

I = 2.2046 kg/hr/lb/hr

J = Hours of earth moving operations

$$E = \frac{0.45 \times (7.5)^{1.5}}{(2.0)^{1.4}} \times 2.2046 \times 5 = 38.61 \text{ lb/day}$$

$$\frac{38.61 \text{ lb/day} \times 22 \text{ days/mo} \times 3 \text{ mo/quarter}}{2000 \text{ lb/ton}} = 1.27 \text{ tons/quarter}$$

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CALCULATIONS FOR PHASE 1 AIR EMISSIONS

Equipment	Monthly Usage (hr)	No. of Pieces	Quarterly Usage	HP Rating	Units	Pollutant Emission Factors					Pollutant Emission Rates (lb/quarter)				
						CO	ROC	NOx	SOx	PM10	CO	ROC	NOx	SOx	PM10
Bulldozer	110	2	330	-	lb/hr	0.346	0.148	1.260	0.137	0.112	228.36	97.68	831.60	90.42	73.92
Wheeled Loader	110	2	330	-	lb/hr	0.572	0.291	1.890	0.182	0.172	377.52	192.06	1,247.40	120.12	113.52
Backhoe	110	2	330	-	lb/hr	0.572	0.291	1.890	0.182	0.172	377.52	192.06	1,247.40	120.12	113.52
Grader	110	1	330	-	lb/hr	0.151	0.039	0.713	0.086	0.061	49.83	12.87	235.29	28.38	20.13
Compactor	110	1	330	210	lb/hp-hr	0.007	0.002	0.020	0.002	0.001	485.10	138.60	1,386.00	138.60	69.30
Crane	110	1	330	200	lb/hp-hr	0.009	0.003	0.023	0.002	0.0015	594.00	198..00	1,518.00	132.00	99.00
										SUBTOTAL	**2,112.33**	**831.27**	**6,465.69**	**629.64**	**489.39**

Equipment	Monthly Usage (mi)	No. of Units	Quarterly Usage (mi)	Cold Starts/ Quarter	Pollutant Running Emission Factors (lb/mi)					Cold Start Emission Factors lb/start			Pollutant Emission Rates (lb/quarter)				
					CO	ROC	NOx	SOx	PM10	CO	ROC	NOx	CO	ROC	NOx	SOx	PM10
Dump Truck	660	3	1,980	198	0.022	0.005	0.018	0.001	0.001	0.181	0.010	0.006	166.52	31.68	108.11	5.94	5.94
Water Truck	440	1	1,320	66	0.022	0.005	0.018	0.001	0.001	0.181	0.010	0.006	40.99	7.26	24.16	1.32	1.32
												SUBTOTAL	**207.51**	**38.94**	**132.27**	**7.26**	**7.26**
												Total Direct Emissions from Construction Equipment Exhaust	2,319.84	870.21	6,597.96	636.90	496.65
												Emission Rates, tons/quarter - lb/2000 lb/ton	1.15	0.44	3.30	0.33	0.25
Worker Vehicles	880	30	26,400	1,980	0.008	0.006	0.001	0.0001	0.0002	0.160	0.010	0.006	950.99	67.32	91.08	7.92	15.84
												Emission Rates, tons/quarter - lb/2000 lb/ton	0.48	0.03	0.05	0.00	0.00
Delivery Trucks	880	3	2,640	198	0.022	0.005	0.018	0.001	0.001	0.181	0.010	0.006	210.08	41.58	143.74	7.92	7.92
												Emission Rates, tons/quarter - lbs/2000 lb/ton	0.11	0.02	0.07	0.00	0.00

Notes:

CO - Carbon monoxide.
HP or hp - Horse power.
hp-hr - Horse power - hour.
NOx - Nitrogen oxides.
PM10 - Particulate mater (10 microns in diameter or less).
ROC - Reactive organic carbon.
SOx - Sulfur oxides

PHASE 2
PM_{10} EMISSION FROM AGGREGATE HANDLING

$$E = k(0.0032)\frac{(u/5)^{1.3}}{(m/2)^{1.4}}$$

Where:

E = Emission factor (lb/ton)

k = Particle size multiplier (0.35 for PM_{10})

U = Mean wind speed (mph) = 3 mph

M = Material moisture content (%) = 2

$$E = (0.35)(0.0032)\frac{(3/5)^{1.3}}{(0.02/2)^{1.4}} = 0.36376 \text{ lb/ton}$$

Assume 1,613 ft^3 of aggregate is handled each day (soil density = 115 lb/ft^3):

1,613 ft^3 x 115 lb/ft^3 = 185,495 lb of soil handled each day

$$\frac{185{,}495 \text{ lb}}{2000 \text{ lb/ton}} \times 0.36376 = 33.74 \text{ lb of } PM_{10}\text{/day}$$

33.74 lb/day x 22 days/mo x 3 days/quarter = 2,226.84 lb/quarter

$$\frac{2{,}226.84 \text{ lb}}{2{,}000 \text{ lb/ton}} = 1.11 \text{ tons of } PM_{10} \text{ per quarter}$$

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CALCULATIONS FOR PHASE 2 AIR EMISSIONS

Equipment	Monthly Usage (hr)	No. of Pieces	Quarterly Usage	HP Rating	Units	Pollutant Emission Factors					Pollutant Emission Rates (lb/quarter)				
						CO	ROC	NOx	SOx	PM10	CO	ROC	NOx	SOx	PM10
Bulldozer	100	1	300	-	lb/hr	0.346	0.148	1.260	0.137	0.112	103.80	44.40	378.00	41.10	33.60
Wheeled Loader	100	1	300	-	lb/hr	0.476	0.291	1.890	0.182	0.172	142.80	87.30	567.00	54.60	51.60
Grader	100	1	300	-	lb/hr	0.151	0.039	0.713	0.086	0.061	45.30	11.70	213.90	25.80	18.30
Compactor	100	1	300	210	lb/hp-hr	0.007	0.002	0.020	0.002	0.001	441.00	126.00	1,260.00	126.00	63.00
Crane	100	1	300	210	lb/hp-hr	0.009	0.003	0.023	0.002	0.0016	567.00	189.00	1,449.00	126.00	100.80
Concrete Pump	100	3	300	100	lb/hp-hr	0.020	0.003	0.024	0.002	0.0016	1,800.00	270.00	2,160.00	180.00	144.00
Direct Pollutant Emissions, Construction Equipment											3,099.90	728.40	6,027.90	553.50	411.30
Tons/quarter (lbs/2000)											1.55	0.36	3.02	0.28	0.21

Equipment	Monthly Usage (mi)	No. of Units	Quarterly Usage (mi)	Cold Starts/ Quarter	Pollutant Running Emission Factors lb/mi					Cold Start Emission Factors lb/start			Pollutant Emission Rates (lb/quarter)				
					CO	ROC	NOx	SOx	PM10	CO	ROC	NOx	CO	ROC	NOx	SOx	PM10
Worker Vehicles	880	15	2,640	990	0.008	0.006	0.001	0.0001	0.0002	0.181		0.006	495.99	33.66	45.54	3.96	7.92
Emission Rates, tons/quarter (lb/2000)													0.25	0.02	0.02	0.00	0.00
Delivery Trucks	293.30	10/day	880	220	0.022	0.005	0.018	0.001	0.001	0.181	0.010	0.006	233.42	46.22	159.72	8.80	8.80
Emission Rates, tons/quarter (lbs/2000)													0.12	0.02	0.08	0.00	0.00

Notes:

CO - Carbon monoxide.
HP or hp - Horse power.
hp-hr - Horse power - hour.
NOx - Nitrogen oxides.
PM10 - Particulate mater (10 microns in diameter or less).
ROC - Reactive organic carbon.
SOx - Sulfur oxides

2.3.8.2 MTA Systemwide Criteria, Section 2.8.9, Construction Noise and Vibration Control

2.8.9 Construction Noise and Vibration Control

A. General

Perform construction operations in a manner to minimize noise and vibration. Provide working machinery and equipment with efficient noise suppression devices and employ other noise and vibration abatement measures necessary for protection of both employees and the public. In addition, restrict working hours and schedule operations in a manner that will minimize to the greatest extent feasible the disturbance to the public in areas adjacent to the work and to occupants of buildings in the vicinity of the work. Protect employees and the public against noise exposure in accordance with the requirements of the Occupational Safety and Health Act of 1970 and the current statutory noise limits set by the Occupational Safety and Health Administration (Ref. 7). Compliance with the requirements of this Section will not relieve the Contractor from responsibility for compliance with the state and local ordinances, regulations, and other Sections of this criteria document.

B. Special Requirements

Compliance with the requirements of this Section will require the use of machines with effective mufflers or enclosures and selection of quieter alternative procedures. Compliance may also require the use of completely closed enclosures (tongue and groove plywood or sheathing) around work sites or a combination of closed boarding and effective mufflers or enclosures. It will also be necessary to arrange haul routes to minimize noise and vibration at residential sites and it may be necessary to place operating limitations on machines and trucks. Shop drawings of work sites and haul routes showing provisions for control of construction noise shall be submitted to the Engineer for approval.

C. Monitoring

Monitor noise and vibration levels of work operations to ensure compliance with the noise and vibration limitations contained herein and retain records of noise and vibration measurements for inspection by the Engineer. Promptly inform the Engineer of any complaints received from the public regarding noise and vibration. Describe the action proposed and the schedule for implementation, and subsequently inform the Engineer of the results of the action.

D. Definitions

Daytime/Nighttime. Daytime refers to the period from 7:00 a.m. to 7:00 .

p.m. local time daily except Sundays and legal holidays. Nighttime refers to all other times including all day Sunday and legal holidays.

Construction Limits. The right-of-way lines, construction easement boundary or property lines as indicated on the drawings.

Special Zones or Special Construction Sites. These may be designated outside of the construction site by the agency having jurisdiction where the construction site is located. These specially designated zones shall be treated by the contractor as if they were within the construction limits.

E. Noise Level Restrictions

Noise Level Restrictions in All Areas. In no case expose the public to construction noise levels exceeding 90 dBA (slow) or to impulsive noise levels with a peak sound pressure level exceeding 140 dB as measured on an impulse sound level meter or 125 dBC maximum transient level as measured on a general purpose sound level meter on "fast" meter response.

Noise Level Restrictions at Affected Structures. Conduct construction activities in such a manner that the noise levels 200 feet from the Construction Limits or at the nearest affected building, whichever is closer, do not exceed the levels listed Tables 2-13 and 2-14.

Continuous Noise. Prevent noises from stationary sources, parked mobile sources or any source or combination of sources producing repetitive or long-term noise lasting more than a few hours from exceeding the limits of Table 2-13.

TABLE 2-13
LIMITS FOR TOTAL CONSTRUCTION SITE NOISE

Affected Structure or Land Use	Maximum Allowable Continuous Noise Level, dBA	
Residential	Daytime	Nighttime
Single family residence not along a major arterial.	60	50
Land uses along an arterial or in multi-family residential areas, including hospitals	65	55
In commercial areas,including hotels	70	60
Commercial		At all Times
In noise-sensitive semi-residential/commercial areas, including schools, libraries, churches, etc.		70
In non-noise-sensitive commercial areas with no nighttime residency		75
Industrial		
All locations		80

Intermittent Noise. Prevent noises from non-stationary mobile equipment operated by a driver or from any source of intermittent, non-reoccurring on a long term basis, non-scheduled repetitive, short-term noises not lasting more than a few hours from exceeding the limits of Table 2-14.

TABLE 2-14
LIMITS FOR INTERMITTENT CONSTRUCTION NOISE

Affected Structure or Land Use	Maximum Allowable Intermittent Noise Level, dBA	
Residential	Daytime	Nighttime
Single family residence not along a major arterial	75	60

Land uses along an arterial or in multi-family residential areas, including hospitals	80	65
In commercial areas,including hotels	85	70
Commercial		At all Times
In noise-sensitive semi-residential/commercial areas, including schools, libraries, churches, etc.		85
In non-noise-sensitive commercial areas with no nighttime residency		85
Industrial		
All locations		90

Special Zone or Special Construction Site. In areas outside of Construction Limits which have been determined to be outside of noise sensitive areas, but for which the Contractor has obtained designation as a special zone or special construction site from the agency having jurisdiction, the noise limitations for buildings in industrial areas apply.

In zones designated by the local agency having jurisdiction as a special zone or special premise or special facilities, such as hospital zones or areas with libraries, schools, etc., the noise level and working time restrictions imposed by the agency shall apply. These zones and work hour restrictions shall be obtained by the Contractor from the local agency.

More Than One Limit Applicable. Where more than one noise limit is applicable, use the more restrictive requirement for determining compliance.

F. Noise Emission Restrictions

Use only construction equipment meeting the noise emission limits listed in Table 2-15, as measured at a distance of 50 feet from the equipment in substantial conformity with the provisions of the latest revisions of SAE J366b, SAE J88, and SAE J952b (Refs. 8, 9, 10) or in accordance with the measurement procedures specified herein.

TABLE 2-15
NOISE EMISSION LIMITS ON CONSTRUCTION NOISE

TYPE OF EQUIPMENT	MAXIMUM NOISE LIMIT Date Equipment Acquired: Before 1-1-1986	On or After 1-1-1986
All equipment other than highway trucks; including hand tools and heavy equipment	90 dBA	85 dBA

	Date Equipment Acquired: Before 1-1-1988	On or After 1-1-1988
Highway trucks in any operating mode or location	83 dBA	80 dBA

Peak levels due to impact pile drivers may exceed the above noise emission limits by 10 dBA.

G. Vibration Level Restrictions

Vibration Limits in All Areas. Construction activities shall be conducted so that vibration levels at a distance of 200 feet from the construction limits or at the nearest affected building (whichever is closer) do not exceed the following root-mean-square (rms) unweighted vibration velocity levels in any direction over the frequency range of 1 to 100 Hz:

Vibration Type and Permissible Aggregate Duration	Limit
Sustained (≥1 hr/day)	0.01 in/sec (80 dB re 10^{-6} in/sec)
Transient (<1 hr/day)	0.03 in/sec (90 dB re 10^{-6} in/sec)
Transient (<10 min/day)	0.10 in/sec (100 dB re 10^{-6} in/sec)

Special Zones. In zones designated by the local agency having

jurisdiction as a special zone or special premise or special facilities such as hospital zones, or areas with libraries, schools, etc., the vibration level and working time restrictions imposed by the agency shall apply. These zones and work hour restrictions shall be obtained by the Contractor from the local agency.

H. Noise and Vibration Control Requirements

Notwithstanding the specific noise and vibration level limitations specified herein, utilize the noise and vibration control measures listed below to minimize to the greatest extent feasible the noise and vibration levels in all areas outside the Construction Limits.

- Utilize shields, impervious fences or other physical sound barriers to inhibit transmission of noise.
- Utilize sound-retardant housings or enclosures around noise-producing equipment.
- Utilize effective intake and exhaust mufflers on internal combustion engines and compressors.
- Line or cover hoppers, storage bins and chutes with sound deadening material.
- Minimize the use of air- or gasoline-driven saws.
- Conduct truck loading, unloading and hauling operations so that noise and vibration is kept to a minimum.
- Route construction equipment and vehicles carrying spoil, concrete or other materials over streets and routes that will cause the least disturbance to residents in the vicinity of the work. Advise the Engineer in writing of the proposed haul routes prior to securing a permit from the local government.
- Site stationary equipment to minimize noise and vibration impact on the community, subject to approval of the Engineer.
- Use vibratory pile drivers or augering for setting piles in lieu of impact pile drivers. If impact pile drivers must be used, their use is restricted to the hours from 8:00 a.m. to 5:00 p.m. weekdays in residential and in semi-residential/commercial areas.

2.3.8.3 Evaluation of Change in Noise Impacts, Proposed Blue Line Wayside Horn System

LA-03498 A

Evaluation of Change in Noise Impacts, Proposed Blue Line Wayside Horn System

HMMH Report Number 292940-1

April 6, 1994

HARRIS MILLER MILLER & HANSON INC.

Consultants in Noise and Vibration Control

LA-03498 A

TECHNICAL MEMORANDUM

TO: Linda Meadow, Rail Construction Corporation
Jim Curry, Engineering Management Consultant

FROM: Hugh Saurenman
Harris Miller Miller & Hanson Inc.

DATE: April 6, 1994

SUBJECT: Evaluation of Change in Noise Impacts, Blue Line Wayside Horn System

HMMH Job No. 292940.01

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1. INTRODUCTION/SUMMARY

This memorandum summarizes our review and analysis of using wayside horns at grade crossings to replace the normal train mounted horns for warning pedestrians and motorists of approaching trains. The goal of the wayside horn system is to reduce noise impacts for communities near grade crossings without compromising motorist or pedestrian safety. Section 2 summarizes some of the literature that we reviewed and Section 3 is a preliminary noise impact analysis for wayside horns compared to normal train mounted horns. Section 4 lists some of our preliminary recommendations for the wayside horn system and gives a list of the issues and unresolved questions that will be considered in testing of the prototype wayside horn system.

Following is a summary of general conclusions and observations from the work we have done to date:

1. Noise Impact: Switching to stationary horns could dramatically reduce noise impact near the grade crossings. The amount of reduction would depend on the loudness and directivity of the wayside horns. To some degree, the reduction would also depend on how many and where the wayside horns are installed.

2. Grade Crossing Safety: There is the real possibility that safety at the grade crossings will be improved with the wayside horns. Present plans are that the wayside horns will be sounded for the full approach time of 8 to 10 seconds. Even though the maximum sound levels of the wayside horns may be slightly lower than the maximum sound levels of the existing train horns, because the wayside horns would be located right at the intersection, the warning signal at crossing danger zones would be louder except for the last one to two seconds before the train reaches the intersection, at which point it would probably be too late for a car to get out of a danger zone.

3. Train Direction: The stationary horns will not provide information about which direction the trains are coming from. It is unclear how important this is since it is difficult to identify the direction of a sound source from inside a car, particularly with the windows closed and the radio on. From spending a short time at 130th Street listening to trains approaching the grade crossing, it seemed like I could sometimes tell which direction the train was coming from. I suspect this is most important when two trains approach the grade crossing at almost the same time or when a driver is in the danger zone as the train approaches.

4. Literature Review: A review of the literature reveals considerable research into grade crossing safety, although most is oriented toward active devices such as warning lights, bells and automatic

gates. It is clear that installation of automatic gates at grade crossings has significantly reduced the national accident rate at railroad grade crossings. It is also clear that sounding train horns before crossings with active warning devices represents a redundant warning and is not the primary method of alerting people that a train is approaching. There is no indication in the available studies that the ability to determine from the horn noise the direction that a train is coming from is a relevant factor for grade crossing safety.

5. Emergency Vehicle Sirens: Studies of effectiveness of emergency vehicle sirens have shown that the siren noise must be quite high right outside a car to be sure that the driver will hear the siren. Although train horns serve a similar purpose as emergency vehicle sirens, since the horn is not the primary warning that a train is approaching, studies on effectiveness of emergency vehicle sirens may not be relevant to grade crossing safety. Drivers are not normally expecting emergency vehicles, which means that the siren must cut through the background noise and get the attention of a driver who is not thinking about an emergency vehicle. In contrast, at a gated crossing with the gates down, lights flashing and bells ringing, most people are expecting that a train is approaching the crossing. When drivers get impatient and go around the gates, they will probably hear a train horn and initiate evasive action even though the horn sound level is well below what is required for most people to hear an emergency vehicle siren.

5. Florida Whistle Ban: A study of the accident rate following banning of nighttime train whistles at most public grade crossings on the Florida East Coast Railroad clearly demonstrated that the accident rate increased as a result of the whistle ban. The study concluded that the grade crossing accident rate approximately tripled as a result of the nighttime whistle ban. This was a surprising result, but does seem to show that, at least for this one freight line, the train horns contribute to grade-crossing safety. A more limited ban on train whistles in Eugene, Oregon showed a similar result.

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2. SUMMARY OF LITERATURE REVIEW

As part of our assessment, we did a literature search of available research and design information on railroad grade crossings. We particularly looked for information on effectiveness of audible warning signals and approaches to improve safety. Some of the most interesting reports are summarized below.

Study of Acoustic Characteristics of Railroad Horn Systems (1993)[1]*

This study reports on sound level characteristics of train warning horns including several freight locomotives, commuter rail locomotives, and a prototype automated wayside horn system. The report provides useful information on acoustic characteristics of train horns. A general observation was that a horn with a broadband signal is more likely to overcome background noise and attract motorists' attention. The implication is that a five-chime horn system is more effective than a three-chime horn system. The same group has apparently completed a draft report on train horn audibility inside motor vehicles, but that report is not available at this point. In fact, the person that I talked to at the Volpe National Transportation Systems Center was pointed in not revealing any of the conclusions of that study. In a subsequent conversation with another person involved in the study, I got the impression that the results may seem to contradict the results of the study on the Florida Train Whistle Ban (discussed below).

Method for Estimating the Audibility and Effective Loudness of Sirens and Speech in Automobiles (1976)[2]

Effectiveness of Audible Warning Devices on Emergency Vehicles (1978)[3]

The overall conclusion was that emergency vehicle warning signals often are not noticed by motorists. Ensuring that all motorists will hear warning signals requires a relatively high noise level outside the vehicle because of potential masking noise from normal road noise and radios and the high level of outside-inside sound insulation when windows are closed. We did not find any specific studies of audibility or effectiveness of train horns, just these two studies from the late 70's on emergency vehicle sirens.

Driver Behavior at Rail-Highway Crossings (1990)[4]

This is a fairly recent comprehensive review of literature pertaining to driver behavior at grade crossings. There is a wealth of general information in here related to grade crossing safety, although only a brief discussion of train horns with the general conclusion that the horns are useful to supplement the visual clues, but not as the primary means of alerting the motorist. They note that: "Perhaps consistent with this

*References listed at end of report.

view, there is relatively little research, or even discussion in the literature, about the effectiveness of auditory signals." Following is a summary of some of the discussion about the horns:

- In contrast to visual stimuli, auditory signals have the advantage of not requiring the listener to be oriented toward the signal. However, auditory signals for grade crossings suffer from serious drawbacks and are not generally considered sufficient as a primary means of alerting the motorist. The author states that auditory signals are best viewed as a supplementary form of warning.

- No actual research on the perception of train signals was uncovered. Neither the change in loudness nor the Doppler effect were considered to be important for detecting trains.

- The conflict with community noise is an inherent limitation on use of train horns at grade crossings. An optimal warning signal must alert most motorists when the train is still sufficiently far from the crossing that the motorist can take appropriate action. Annoyance and interference with home or workplace activities can take place at sound levels much lower than those required to meet the driver warning criteria.

- The intensity of an acoustic signal is limited by three important constraints in addition to the realistic limits on the sound level at the source: (1) geometric spreading attenuation (6 dB attenuation with every doubling of the source/receiver distance); (2) physical barriers that reflect or absorb sound including the car structure and window, foliage, and buildings; and (3) climatic conditions, particularly wind, which can reduce the sound level 5 to 10 dB at distances of 1000 ft.

- Based in part on a study by Aurelius and Korobow[5] in 1975, a 1985 NTSB Safety Study concluded that current FRA standards for horn performance levels were inadequate, and recommended that they at least be raised to the levels of Amtrak horns. The current FRA standard is a minimum sound level of 96 dBA 100 feet in front of the train and Amtrak horns are 10 to 15 dB louder than this. Because of the difficulty in hearing trains from inside a motor vehicle, there have been suggestions that all drivers be required to roll down their windows and reduce speed when approaching grade crossings.

- The results of the Aurelius and Korobow study was also referenced as indicating that a warning signal of 109 dB was required to be heard inside a motor vehicle traveling between 51 and 65 mph. With the Blue Line train horns, you have to be within 25 feet of the front of the train before the sound level is 109 dB. Clearly if motorists do not hear the train horn until it is 25 feet away, it is already too late.

- Given the limitations of visual warnings, it would be desirable to provide redundant information through other channels such as rumble strips in the pavement. These suffer the limitation of being passive devices, unrelated to train presence. The author suggested that consideration be given to other active devices to provide auditory/tactile cues such as raising or lowering some otherwise flush elements in the road or highly focused acoustic signals that are less environmentally intrusive. The second suggestion sounds very similar to the proposed wayside horn system for the Blue Line.

Some interesting observations and conclusions in this report that are not specifically related to the train horns are:

- Trains are not very visible at night. Use of xenon strobe lights can markedly improve visibility and the ability of people to judge train speed. There have been some studies with xenon strobes, however the "evidence supporting the effectiveness of roof mounted xenon strobes consists of primarily subjective judgements of conspicuity, made by observers who were expecting to see a strobe-equipped train."

- White xenon strobe lights were found to be much more conspicuous than standard 8 3/8" incandescent flashers. They were recommended as a supplement to standard flashers on the crossing buck or the gate. Some possible drawbacks to this approach were pointed out.

- Warnings lose their effectiveness if they are not credible. False alarms are the most serious case, although the credibility of active signals will also be weakened if the delay before a train is so long that waiting is unnecessary.

- Violations at crossings with active warning devices are less common when they have a constant time warning feature. Four quadrant gates were found in one study to have violation rates near zero. I understand that the Southern Pacific tracks sharing the right-of-way with the Blue Line have constant time warning signals.

- People often have difficulty judging the speed, distance, and closing rate of trains at grade crossings.

- Directional arrows were suggested as a means of indicating direction of the oncoming train. These apparently are used in some countries.

- There are a small percent of people who believe it is okay to go around gates.

- People are often insensitive to multiple track crossings and do not comprehend sight restrictions at grade crossings.

- Motorists who go around gates and get hit are not aware of how close the train is to the grade crossing, misjudge the train speed, have impaired judgement because of alcohol/drug use, or do not realize a second train is coming. It seems apparent that anybody driving around a grade crossing gate must be aware that a train could be coming because of the bells, lights, and automatic gates. This seems to indicate that there is no need to provide the redundant warning of the horn for motorists who are still some distance from the grade crossing. Also, anything that makes the trains more visible and makes it easier to perceive train speed would improve safety.

Florida's Train Whistle Ban (1992)[6]

In 1984, the Florida State Legislature enacted legislation that allowed local jurisdictions to ban nighttime train whistles at all eligible grade crossings. To be eligible, the crossings had to be equipped with automatic gates, flashing lights, bells, and special advance warning signs. This legislation primarily applied to the Florida East Coast Railway Company (FEC). By the end of 1989, the ban was effective at all but 89 of FEC's 600 public grade crossings. This FRA study was in response to a request by a Florida Representative to see if there was "any correlation between those areas that have regulations about whistle blowing after dark and the number of freight [train] crossing accidents?" The study, which seems to have been a very careful statistical analysis, shows a dramatic increase in the accident rate. The study authors responded to a number of suggestions that other factors that might be responsible for the increase in accident rate and appear to have carefully evaluated the potential for these factors to have any influence on the results. I have not attempted to check the statistical analysis, however, there does not seem to be any question but that the accident rate increased after whistles were banned at night.

The conclusion of this report seems to be a direct contradiction of all the information that warning signals are not very audible inside motor vehicles. Since all of the grade crossings had automatic gates, flashing lights, and warning bells, it seems unlikely that motorists involved in accidents did not realize a train was probably approaching the crossing. Assuming that motorists know that a train could be coming, accidents must be due to errors in judgement about how far away the train is or by not seeing the train. Sounding the whistle might provide an extra degree of warning or a verification that a train is really coming. This may be what it takes to stop a driver who is prone to go around a down gate. Correspondingly, if the driver is already around the gate and on the tracks, they would be very sensitive to train horn noise and likely to react quickly to accelerate out of the danger zone when they heard a train whistle.

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As a result of this study, the Federal Railway Administration issued FRA Emergency Order No. 15 requiring the Florida East Coast Railway Company to use train-borne audible warning devices.

3. NOISE IMPACT ASSESSMENT

3.1 Noise Models

We have developed mathematical models to calculate noise exposure at grade crossings with both train mounted and wayside horn systems. These have been used to develop noise exposure contours for the El Segundo Blvd. and 130th Street areas. The grade crossings at El Segundo Blvd. and 130th Street have been selected for demonstration of the wayside horn system. The crossings are located in the Willowbrook area, approximately 0.1 miles apart. There are two Blue Line tracks and one Southern Pacific track at both crossings. The crossings are presently protected by automatic flashing lights, gates, bells, and traffic signals.

The input for the train horn model is based on sound level measurements of the horn on a Blue Line vehicle. For the wayside horn, we have used the information provided by Clever Devices and the sound level recommendations summarized in Section 4. The input parameters are summarized in Table 1.

3.1.1 Train Horn

Following is a brief summary of the primary features of the train horn model:

Loudness: We did some measurements in the storage yard of the sound level of the horn on a Blue Line vehicle. The horn system is a single air horn located at the lower right-hand side of the vehicle. It is mounted on the truck slightly under the front of the car. The measurements showed the sound level to be 95 to 97 dBA 100 feet directly in front of the vehicle. We understand that the specification is for a sound level of 97 dBA. The level would drop slightly below this just before the air compressor would kick in to recharge the air pressure.

The specification for the Blue Line horns requiring 97 dBA at a distance of 100 feet is equivalent to the Federal Railroad Administration (FRA) requirement for freight train horns, although the horns used on Amtrak trains and most freight trains are considerably louder than the FRA requirement. The California Public Utilities Commission (CPUC) requirement is that horns on light rail vehicles have a sound level of at least 85 dBA at a distance of 100 feet.

Directivity: The horn noise is loudest directly in front of the train. The measurements in the Blue Line storage yard indicate that the sound level drops about 7 dB perpendicular to the train and 14 dB directly behind the train. We modeled the directivity as a smooth function by fitting the known values to a cardioid function.

Duration: The model allows specifying the distance from the intersection that the train horn sequence is initiated. For the modeling, we assumed that the horn is sounded continuously from this point until the train reaches the intersection. We did not try to model the long-short-long-long sequence. Since the break between each part of the sequence is quite short, this simplifying assumption has an insignificant effect (less than 1 dB) on the projections of community noise.

Shielding: The buildings and other structures around the grade crossing will act as acoustical shielding reducing the levels of train noise for receivers behind the structures. At this point, we have not accounted for shielding when calculating the noise exposure contours. As discussed later, we did approximate shielding when estimating the time history of train horn noise at the intersection. The shielding will limit the impact zones to one or two rows of buildings from the tracks.

The model starts the train horn at the specified distance from the crossing and assumes that it is sounded continuously until the train reaches the crossing. Train speed, which is an input variable, is used to determine how long the horn is sounded. Sound levels are calculated over a grid around the grade crossing. At each point in the grid, SEL* is calculated by numerical integration of sound level for specified time steps. In a similar manner, the maximum sound level (L_{max}) is determined using the same time steps. By using a numerical approach, it is not necessary to force the directivity function into any simple mathematical model. We used the cardioid functions simply because they seemed to give a reasonable representation of the directivity. Other functions could be used without changing the model formulation. It is possible to get a closed form solution for this model when a uniform (monopole) directivity is used. We did not use this approach since the train horns cannot be accurately modeled as monopole noise sources.

The model was implemented using MathCAD to calculate SEL and L_{max} over a grid of points around the grade crossing. Two models were run, one for a grade crossing where the horn blowing starts 800 feet before the crossing and one where it starts 580 feet before the crossing.** The results were combined

*SEL (Sound Exposure Level) is a measure of the sound energy of a single train/horn event.

**The 800 foot distance applies to trains approaching El Segundo southbound and 130th Street northbound. The 580 foot distance applies to the other directions where the trains are between El Segundo and 130th.

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into a single spreadsheet of noise exposure at grid points covering the entire El Segundo/130th Street area. This grid was then used to generate noise exposure contours. A similar grid of L_{max} values was used to generate L_{max} contours.

3.1.2 Wayside Horn

Loudness: The loudness of the horns is a variable in the model. As discussed below, we tried to pick a horn sound level that would provide warning equivalent to the train horns. In addition, contours were developed for 5 dBA louder and quieter wayside horns.

Directivity: The horn attenuation at 0 degrees (looking straight down the tracks) is assumed to be 0 dB. The horn attenuations at 90 and 180 degrees are input variables for the model. Cardioid functions are used to create a smooth directivity function connecting these three points.

Duration: The wayside horns were assumed to be sounded exactly the same as the train mounted horns. Duration is one of the parameters put into the model.

Location: Two loudspeakers were assumed for each grade crossing, one at the approximate location of each crossing gate. The speakers were assumed to be cantilevered over the center of the oncoming traffic lanes, pointed perpendicular to the tracks. It does not appear that the noise impact would change much if the loudspeaker locations were shifted 10 to 20 feet either direction.

The model for the wayside horn is considerably simpler than the model for the train horn since the horns are stationary. The model was implemented in a spreadsheet with sound energies calculated for a grid of points around the grade crossing. The grid values were used to generate contours for Lmax and Ldn.

3.2 Comparison of Noise Impacts

With the wayside horn system, the overall noise impact will depend on how loud the horns are, the direction they are pointed in, how long they are sounded for each train passby, and where they are mounted. For this initial assessment, we have assumed that two horns will be used and that they will be located above the center of the right lane at the approximate location of the grade crossing gate. The specific parameters used for the noise impact comparison are summarized in Table 1.

To define an appropriate level for the wayside horn, we looked at the train horn sound level time history at three typical motorist positions:

- Location 1: A car waiting at the light to make a left turn from the southbound direction of Willowbrook West onto El Segundo eastbound.

- Location 2: A car on El Segundo eastbound waiting at the intersection of El Segundo and Willowbrook West.

- Location 3: A car waiting to make a right turn from northbound Willowbrook West onto El Segundo eastbound.

Figure 1 illustrates the sound level of the train horn as it approaches the intersection. For this calculation, we have incorporated a reasonable estimate of excess attenuation of the train horn sound levels to make the comparison of the wayside and train horn levels more realistic. This accounts for effects such as shielding by buildings and other obstacles, and excess ground attenuation from propagation along soft ground. We have assumed 8 dB excess attenuation when the train is 800 feet away, and 1 dB when the train is 200 feet away. At distances less than 150 feet, no excess attenuation is assumed. Linear interpolation was used to generate a smooth function.

The wayside horn comparisons shown in Figure 1 assume a sound level of 90 dBA at 100 ft for the wayside horns. A particularly notable feature of this figure is that although the maximum train horn noise levels are between 90 and 94 dBA, the horn noise does not exceed 85 dBA until the train is about 2 seconds from the intersection. An 85 dBA sound would be difficult to hear inside many cars if the windows are closed. With respect to the appropriate loudness for the wayside horn system, Figure 1 indicates that:

1. Wayside horns generating 90 dBA at 100 ft will have maximum sound levels 1 to 4 dBA lower than the existing train horns.

2. It appears that the warning that would be provided by 85 dBA wayside horns would be approximately equivalent to the warning provided by the existing train horns. The maximum sound level of the train horn is higher, but only for one or two seconds before the train enters the intersection. There should be a tradeoff between the lower maximum levels and the longer time that the signal is audible.

3. Wayside horns generating sound levels of 95 dBA at 100 feet would be considerably louder than the existing train horns. At locations where pedestrians wait for the trains to pass, the sound levels could be as high as 100 dBA, which would probably sound inappropriately loud.

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Figure 2 illustrates Lmax* contours for train and wayside horn systems assuming a wayside horn sound level of 90 dBA at 100 feet. This illustrates that the maximum sound levels are approximately the same for both systems in the immediate vicinity of the grade crossings. However, the train horn spreads the noise out over a much larger area than the wayside horn.

A better indication of the community noise impact is given by the Ldn** contours in Figures 3 through 5. Ldn provides a better comparison of total noise impact since it is a measure of cumulative community exposure to noise over a 24-hour period. Each figure shows the Ldn 65 and 70 dBA contours. Although we do not have noise measurements in the vicinity of the El Segundo and 130th Street crossings, ignoring all train noise, the existing Ldn is likely to be around 65 dB. Since the model we used to estimate Ldn does not include any factor for acoustic shielding, these contours tend to overestimate the impact except in areas with a clear view of the tracks and the grade crossing. Following are some points of note about the three Ldn figures:

1. If an 85 dBA wayside horn can provide sufficient warning of approaching trains, noise impact can be reduced to the immediate vicinity of the grade crossings.

2. For a 90 dBA wayside horn, the noise impact within a couple of hundred feet of the grade crossings will be approximately the same as now exists. However, the impact at greater distances from the crossings will be substantially less.

3. If 95 dBA wayside horns must be used to provide adequate warning, there are likely to be some areas where noise impact increases within 300 to 600 feet of the grade crossing. The total impact area would not be significantly smaller than what exists now as can be seen in Figure 5. If it is necessary to use a horn that is this loud, the wayside horn system will not significantly reduce community noise impact.

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*Lmax: The maximum sound level during an event. This is the maximum number that would be read off of a sound level meter as a train approaches the grade crossing with the horn blowing.

**Ldn: Ldn is the abbreviation for the Day-Night Equivalent Level. The abbreviation DNL is also used. Ldn is a measure of community noise exposure over a 24-hour period. It is basically a gauge of how much noise energy there is in a community over a 24-hour period accounting for the number and duration of all noise events. In calculating Ldn, a 10 decibel weighting is added to nighttime noises to account for people being more sensitive to noise at night than during the daytime hours. The effect of this weighting is that, in calculating Ldn, one train at night is equivalent to 10 trains during the daytime. Nighttime is defined as 10 pm to 7 am.

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Table 1. Parameters Used for Noise Impact Comparison

Train Horn			
	Sound Level:*	96 dBA	@ 100 ft
	Directivity:*	0 degrees	0 dB
		90 degrees	-7 dB
		180 degrees	-14 dB
	Train Speed:	55 mph	
	Horn Start:		
	SB	800 ft before El Segundo Blvd.	
		580 ft before 130th Street	
	NB	800 ft before 130th Street	
		580 ft before El Segundo Blvd.	
Stationary Horn			
	Sound Levels:	85 dBA	@ 100 ft
		90 dBA	@ 100 ft
		95 dBA	@ 100 ft
	Directivity:	0 degrees	0 dB
		90 degrees	-7 dB
		180 degrees	-12 dB
	Locations:	Two horns located above center of right traffic lanes at approximate location of crossing gate. Horns facing perpendicular to tracks.	
	Duration:	Same as for train mounted horn (approximately 10 sec when started 800 feet before crossing and 7 to 8 seconds when started 580 feet before crossing). Both wayside horns sounded for every NB and SB train.	
Equivalent number of trains per day:**		248 in each direction	

Notes:

* Sound level and directivity based on measurements of a Blue Line vehicle horn.

** Equivalent number of trains per day for Ldn calculation. This is equal to the total number of daytime trains plus ten time the number of nighttime trains.

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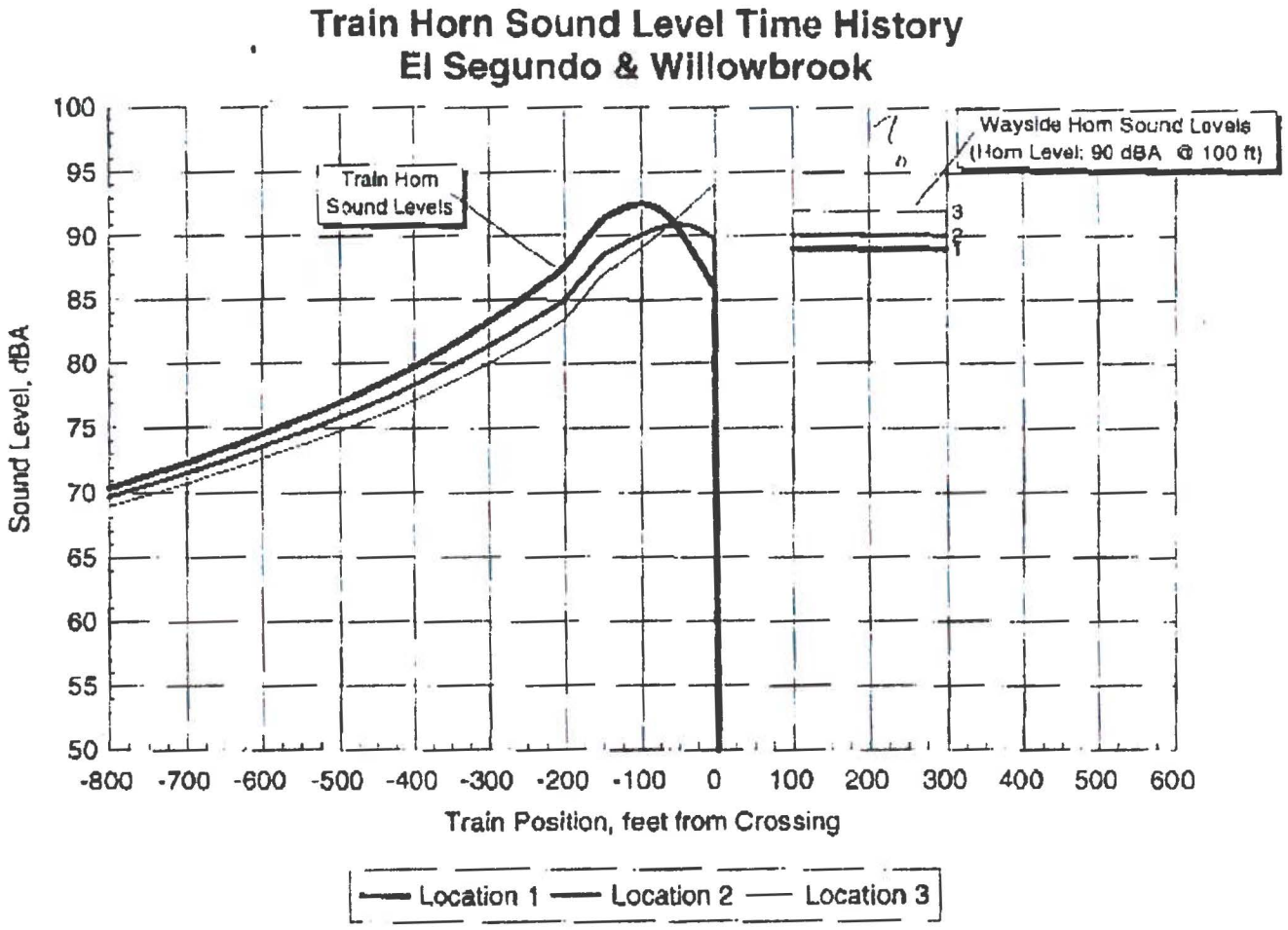
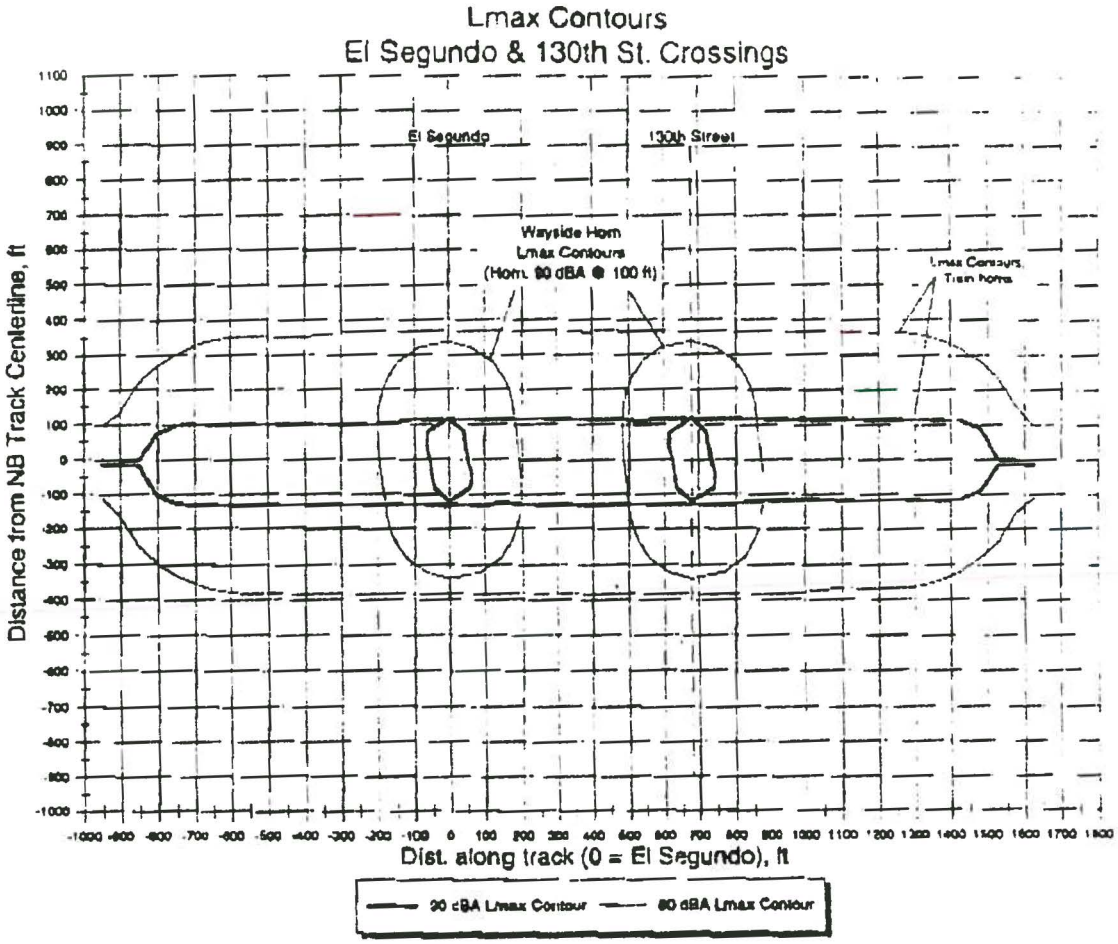


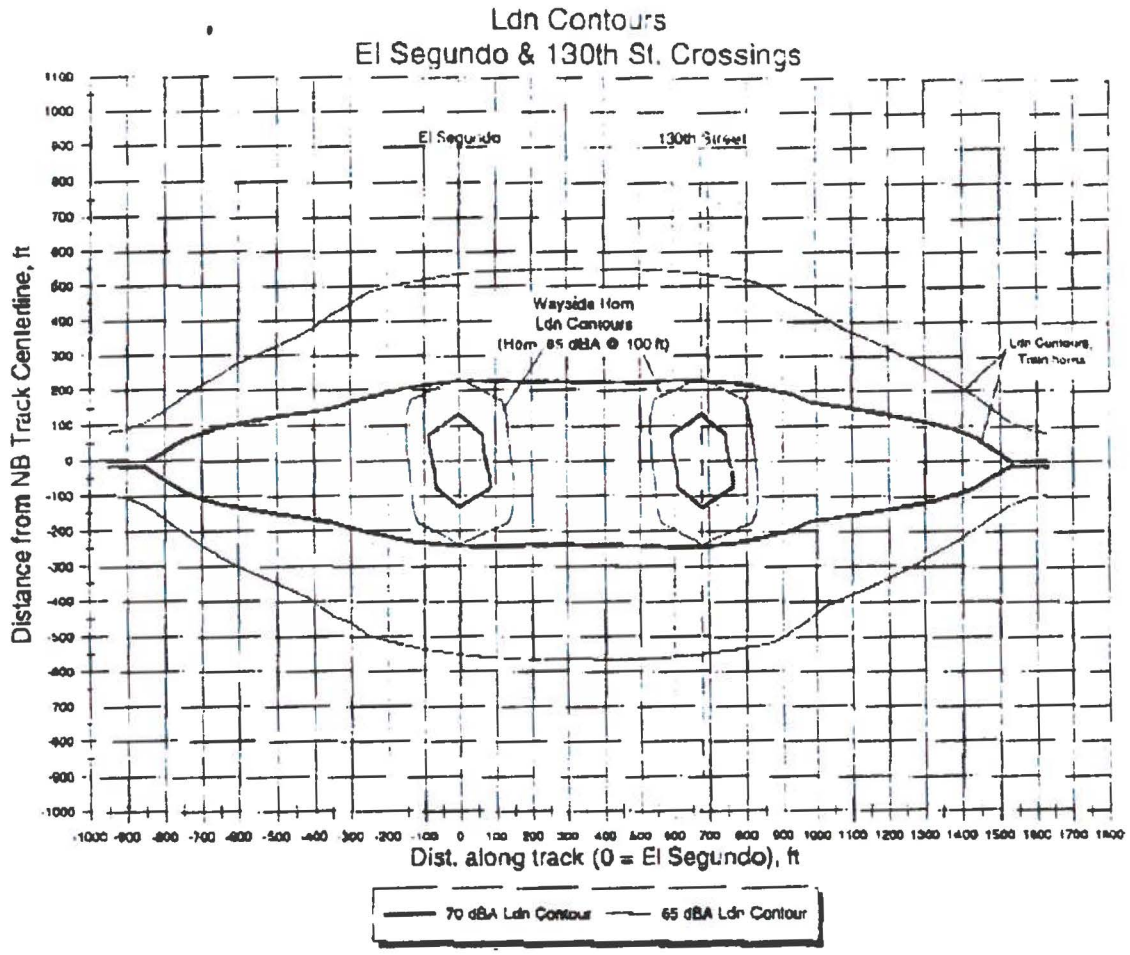
Location 1:	Southbound Willowbrook (west barrel)
Location 2:	Eastbound El Segundo
Location 3:	Northbound Willowbrook (west barrel)

Figure 1. Horn Sound Levels at Motorist Positions



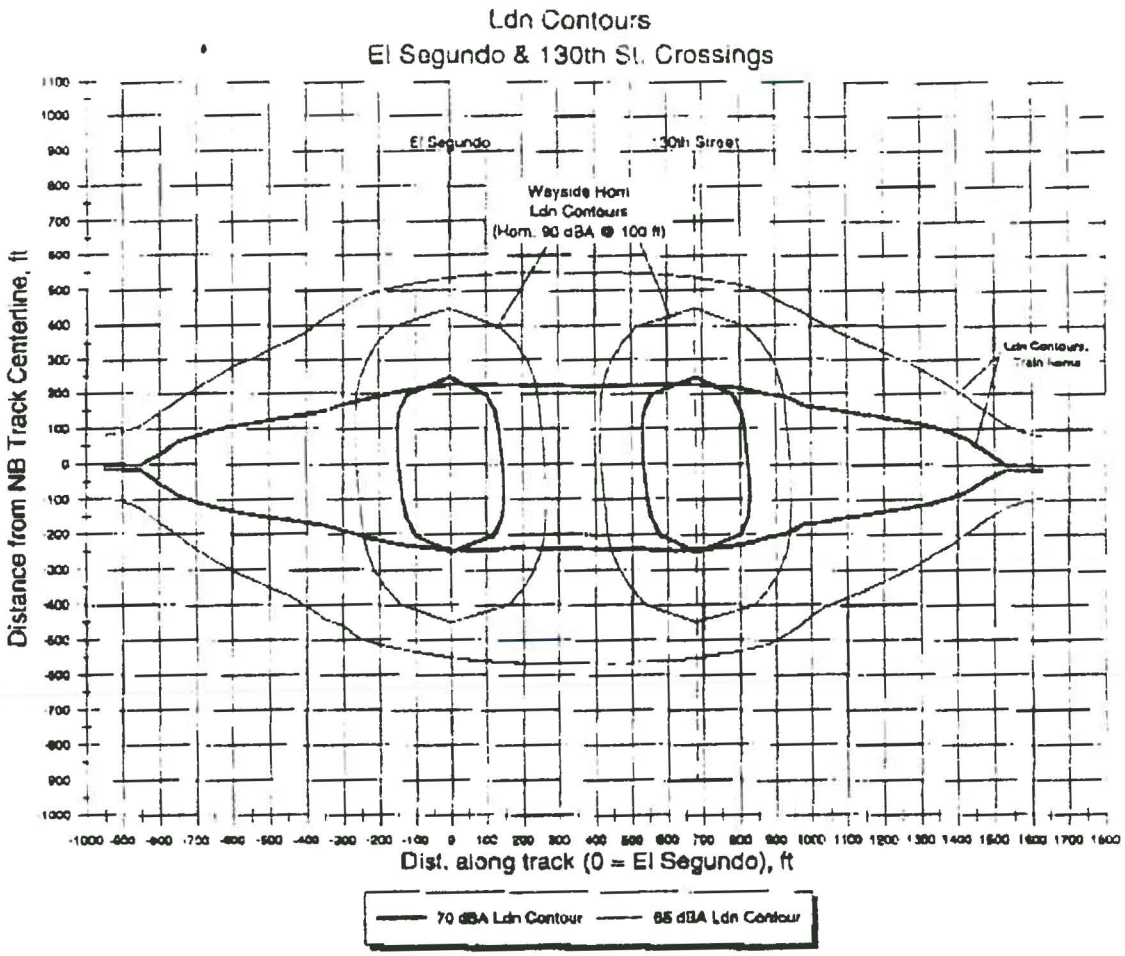
Lmax: Maximum sound level from train horn or wayside horn.

Figure 2. Lmax Contours, 90 dBA Wayside Horn



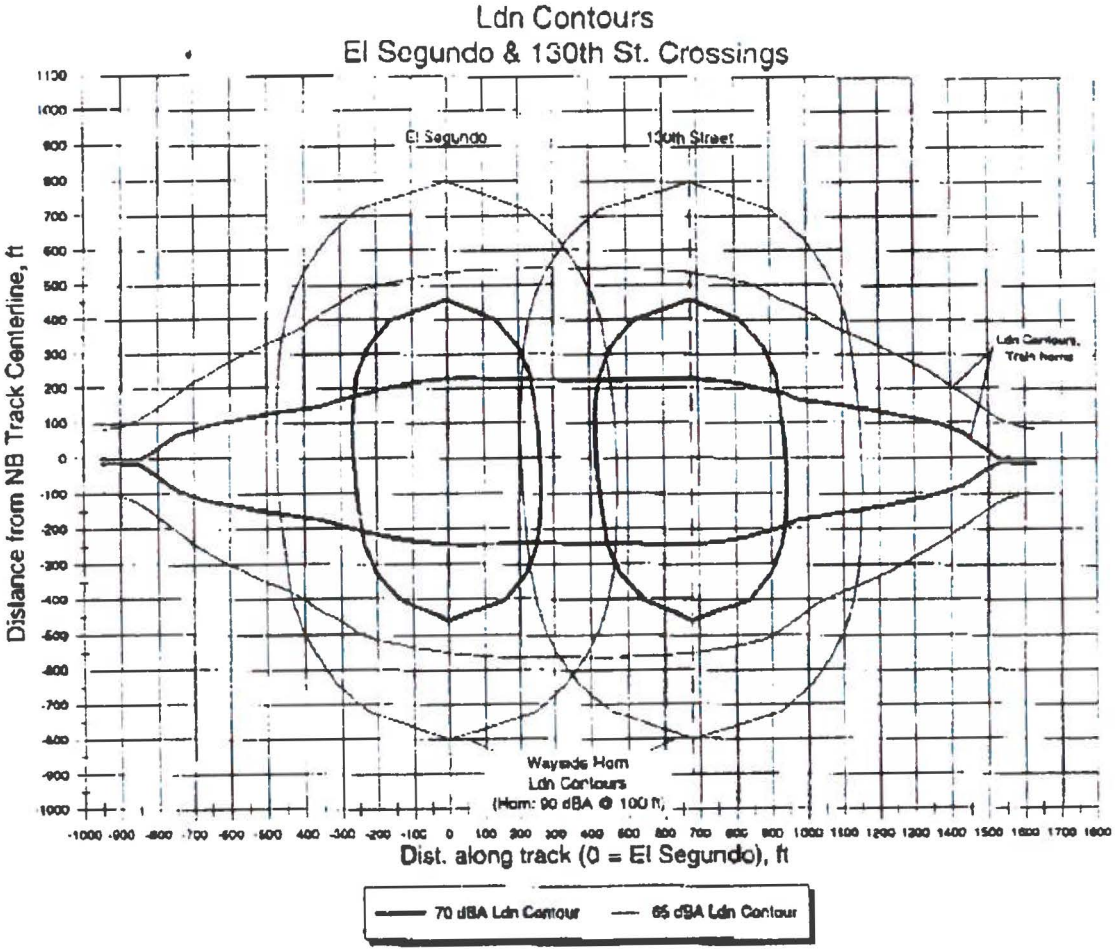
Ldn: Day-Night Equivalent Level with present train schedule on Blue Line. Ldn is a measure of 24-hour community noise exposure with a weighting factor to account for people being more sensitive to night during nighttime hours.

Figure 3. Ldn Contours, Train Horns and 85 dBA Wayside Horns



Ldn: Day-Night Equivalent Level with present train schedule on Blue Line. Ldn is a measure of 24-hour community noise exposure with a weighting factor to account for people being more sensitive to night during nighttime hours.

Figure 4. Ldn Contours, Train Horns and 90 dBA Wayside Horns



Ldn: Day-Night Equivalent Level with present train schedule on Blue Line. Ldn is a measure of 24-hour community noise exposure with a weighting factor to account for people being more sensitive to night during nighttime hours.

Figure 5. Ldn Contours, Train Horns and 95 dBA Wayside Horns

4. PRELIMINARY RECOMMENDATIONS AND ISSUES TO BE RESOLVED

Base on the analysis to this point, we have developed the following recommendations for the wayside horns demonstration project:

1. Area of Influence: Since most motorists are already alerted that a train may be approaching by the lowered gates, flashing lights, and ringing bells, it seems safe to assume that most vehicles will stop at the grade crossings. The horns would then serve to make sure that these people realize that a train is really coming. The horn will not be a primary means of alerting motorists driving on Willowbrook or other streets who are approaching the grade crossing. This means that the horns only need to be heard by motorists and pedestrians in the immediate vicinity of the grade crossing.

2. Number and Location of Horns: For our noise impact analysis, we have assumed two wayside horns at each grade crossing will provide sufficient coverage. The data sheet from Clever Devices indicates a directivity with relatively uniform coverage from about 0 to 45 degrees with the sound levels dropping off to about -7 dB at 90 degrees. We have assumed -12 dB at 180 degrees (directly behind the horn). The optimum location for the horns appears to be mounted fairly high over the center of the oncoming traffic lanes. Pointing the horns slightly downwards will tend to focus the noise towards areas where audible warning is most likely to make a difference. This will also minimize radiation of the horn noise into the surrounding community.

3. Loudness: In order for the wayside horns to provide a warning that is as effective as the train horns, the sound level should be at least 85 to 90 dBA at 100 ft. It would be best if the volume can be adjusted after the wayside horn system is in place to allow for subjective evaluation of the appropriate sound level.

4. Pedestrians: The literature we reviewed did not include any discussion of whether train horns are important for pedestrian safety. It seems that the crossing gate bells would be a sufficient warning of an approaching train, however, it is possible that the redundant warning from train horns reduces the pedestrian accident rate.

5. Evaluation of Effectiveness: There seems to be at least two basic approaches to evaluating the effectiveness of the warning system: interviews of motorists and pedestrians after they have waited at the grade crossing intersection or video tapes of behavior at the grade crossing. In both cases it is desirable to do similar tests before and after the wayside horns are operational. Both approaches can be labor intensive for a thorough, statistically valid evaluation.

LA-03498 A

Some of the unresolved questions and issues to be resolved by testing include:

1. Placement of loudspeakers: For our modeling we assumed the horns would be cantilevered over the center of the oncoming traffic lane. The field tests should confirm whether this is an appropriate location and whether one loudspeaker on each side of the grade crossing provides sufficient coverage.

2. Directing loudspeakers: With the loudspeakers located relatively high above the intersections, it may be possible by pointing the speakers downward to focus the sound at the intersection and reduce the sound radiated into the community. This would be most effective with the speakers located relatively high over the intersection.

3. Loudspeaker volume: With the loudspeakers located close to the danger areas, it may be feasible to reduce the loudspeaker volume even further than assumed for our modeling. An important aspect of the field tests will be to define the optimum sound level for a wayside horn system.

4. Variable volume: One possibility for making the warning more noticeable is to have the loudness of the horn sound increase depending on how close the train is to the intersection. This would probably be difficult with the planned system of activating the wayside horns using the train horn button.

5. Automatic volume control: It may be possible to use a circuit to control loudspeaker volume based on the background noise. This type of circuit will reduce the loudspeaker volume when background noise is low, particularly during nighttime hours. The type of system is sometimes used for public address systems to make sure that announcements are always audible over the background noise but are not excessively high.

6. Two trains at same time: In the short time that I observed at the 130th Street grade crossing, there were several times where northbound and southbound trains approached the crossing simultaneously. A question to be considered is whether wayside loudspeakers can be as effective as the train horns in alerting motorists and pedestrians that a second train is approaching the grade crossing. A concern is that the horn sound for the second train will be interpreted as a continuation of the warning for the first train. With train mounted horns, there is the possibility that being able to detect which direction the train is coming from reduces the danger of nearly simultaneous trains.

REFERENCES

1. AS Keller, EJ Rickley, "The Safety of Highway-Railroad Grade Crossings: Study of Acoustic Characteristics of Railroad Horn Systems," US Department of Transportation Research and Special Programs Administration, Volpe National Transportation Systems Center (Report # DOT-VNTSC-FRA-93-1), Sponsored by Federal Railroad Administration Office of Research and Development. Equipment and Operating Practices Research Division (Report # DOT/FRA/ORD-93/25). July 1993.

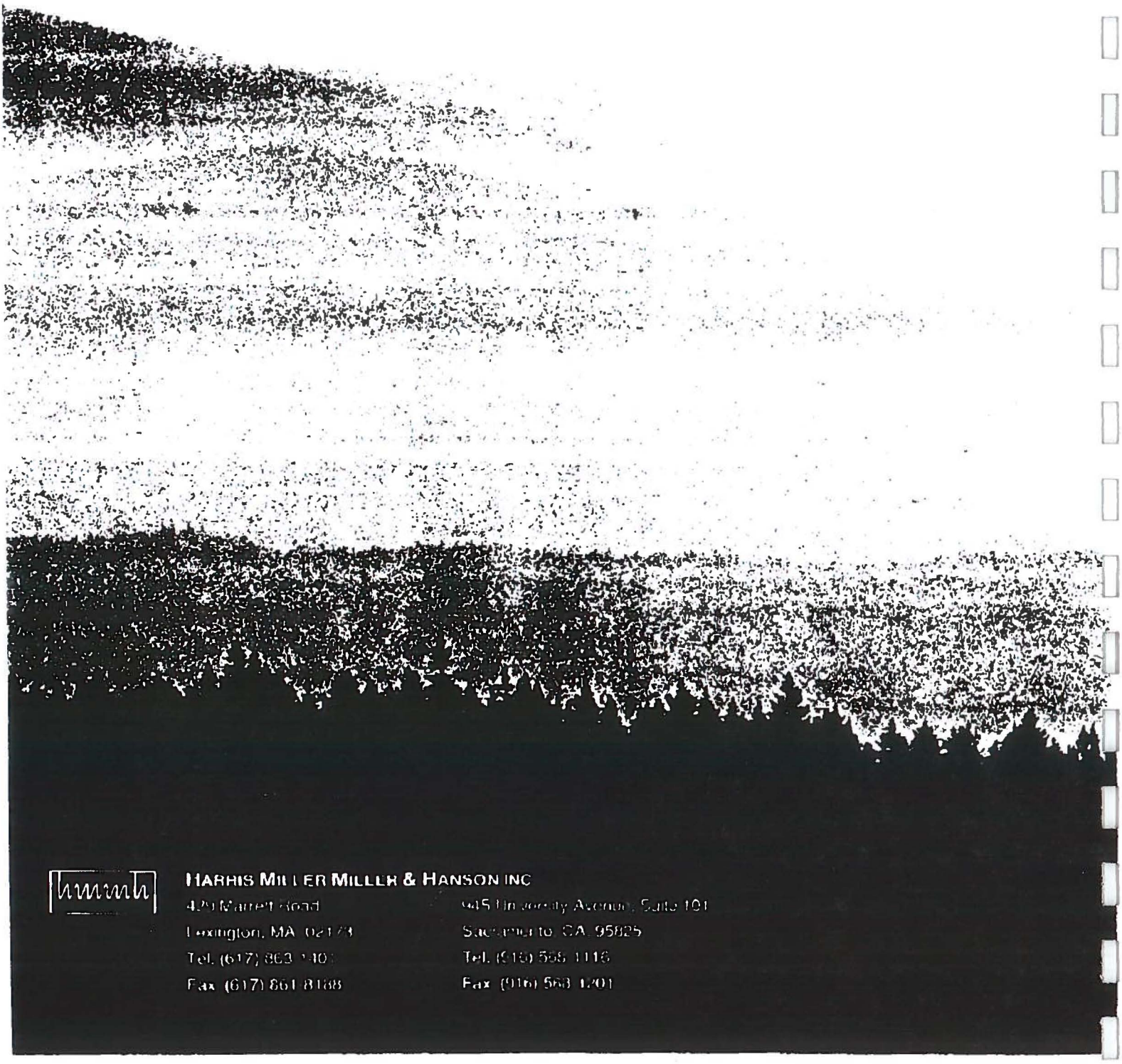
2. ELR Corliss, FE Jones, "Method for Estimating the Audibility and Effective Loudness of Sirens and Speech in Automobiles," J. Acoust. Society of America, 60(5), pp 1126-1131, Nov. 1976.

3. SC Skeiber, RL Mason, RC Potter, "Effectiveness of Audible Warning Devices on Emergency Vehicles," Sound & Vibration, Feb. 1978.

4. N Lerner, D Ratte, J Walker, "Driver Behavior at Rail-Highway Crossings," study performed by Comsis Corporation under contract to Federal Highway Administration, Office of Highway Safety, Program Development Division, Report # FHWA-SA-90-008, June 1990.

5. J.P. Aurelius, N. Korobow, "The Visibility and Audibility of Trains Approaching Rail-Highway Grade Crossings," US Department of Transportation, Federal Railroad Administration (Report No. FRA-RP-71-2), 1978.

6. BF George, "Florida's Train Whistle Ban, Second Edition," Federal Railroad Administration, Office of Safety, September 1992.



HARRIS MILLER MILLER & HANSON INC

Lexington, MA 02173
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Fax: (617) 861-9168

Sacramento, CA 95825
Tel: (916) 568-1116
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2.3.8.4 Changes to Transportation/Circulation Section

LA-03498

ECHELON INDUSTRIES, INC.
19811 E. COLIMA RD., SUITE 620, WALNUT, CA 91789
PHONE: (909) 594-1891 FAX: (909) 598-3810

May 3, 1994

Mr. Harley Martin
Environmental Planner
Los Angeles County Metropolitan Transportation Authority
818 West Seventh Street, 5th Floor
Los Angeles, California 90017

RE: Pasadena-Los Angeles Light Rail Draft SEIR **Addendum**

Dear Mr. Martin:

Listed below are changes to Table 2.2-1 and Section 4.7, the traffic analysis portion of the above referenced project. Please note that the changes are to be made in the draft SEIR by Tetra Tech.

Location	Page 2-5 Table 2.2-1 Environmental Issue: Transportation and Circulation Mitigation Measures
Original Text	1. Exclusive "left turn," "right turn," and "contra-flow" lanes, restriping, signing, signal timing, on-street parking restrictions, and Park and Ride management.
Revised Text	1. Exclusive "left turn" and "right turn" lanes, restriping, signing, signal timing, and on-street parking restrictions.
Location	Page 4-54 Section 4.7.1 Paragraph 1, Sentence 1
Original Text	The revisions to the LRT project include Park and Ride facility alternatives (approximately 1,000 spaces) in the vicinity of Sierra Madre Villa Avenue in Pasadena, closure of Avenues 51, 53, 55, 58, and 61 proposed along the Marmion Way corridor in Highland Park, and a below-grade separation at Marmion Way and Figueroa Street.
Revised Text	The revisions to the LRT project include Park and Ride facility alternatives (approximately 1,000 spaces) in the vicinity of Sierra Madre Villa Avenue in

Pasadena, closure to through traffic of Avenues 51, 53, 55, 58, and 61 (south of Figueroa), where the streets cross the LRT right-of-way, proposed along the Marmion Way corridor in Highland Park, and a below-grade separation at Marmion Way and Figueroa Street.

Location
Page 5-54
Section 4.7.1.1
Paragraph 1, Sentence 1

Original Text
Semi-exclusive operation of the LRT in the Marmion Way corridor and the closure of Avenues 51, 53, 55, 58 (south side) have been proposed.

Revised Text
Semi-exclusive operation of the LRT in the Marmion Way corridor and the closure to through traffic of Avenues 51, 53, 55, 58, and 61 (south of Figueroa), where the streets cross the LRT right-of-way, have been proposed.

Location
Page 4-54
Section 4.7.1.1
Paragraph 5

Original Text
An analysis of existing conditions was conducted using the ICU approach, as described above and as requested by LADOT.

Revised Text
An analysis of existing conditions was conducted using the Intersection Capacity Utilization (ICU) approach. This is the methodology prescribed by the Los Angeles Department of Transportation (LADOT). The operating conditions at intersections are measured on a scale from A to F, inclusive. These values are referred to as Levels of Service (LoS). LoS A represents excellent operation conditions with minimal or no delays, while LoS F represents significant congestion and measurable delays. At LoS F, the traffic demands typically exceed the capacity of the roadway. Appendix D contains a more detailed description of LoS standards (Table D-1).

Location
Page 4-58
Section 4.7.1.2
Heading: East-West Roads
Paragraph 3

Original Text
An analysis of existing conditions was conducted using the Intersection Capacity Utilization (ICU) approach. This is the methodology prescribed by the City of Pasadena [and the Los Angeles Department of Transportation (LADOT)]. The operating conditions at intersections are measured on a scale

from A to F, inclusive. These values are referred to as Levels of Service (LoS). LoS A represents excellent operation conditions with minimal or no delays, while LoS F represents significant congestion and measurable delays. At LoS F, the traffic demands typically exceed the capacity of the roadway. Appendix D contains a more detailed description of LoS standards (Table D-1). The Johnson and Johnson/Merck site and the Builders Emporium site are referred to as the Northern and Southern Sites, respectively, in Appendix D

Revised Text: An analysis of existing conditions was conducted using the ICU approach, as described above and prescribed by the City of Pasadena.

Location: Page 4-76
Section 4.7.5.2
Subheading: Sierra Madre Villa Avenue and Foothill Boulevard
Paragraph 1, Sentence 3

Original Text: Changes to signal timing and detector placement would also be required.

Revised Text: Changes to signal timing and detector placement would also be required. On-street parking on the north side of the westbound approach within 200 feet of the intersection will also have to be prohibited.

Location: Page 4-76
Section 4.7.5.2
Subheading: I-210 West-bound Ramps and Sierra Madre Villa Avenue
Paragraph 1

Original Text: **I-210 West-bound Ramps and Sierra Madre Villa Avenue** - If the Johnson and Johnson/Merck site is chosen, the impacts at this intersection will need to be mitigated. This can be accomplished through parking management or two left turn lanes onto I-210. A 6 to 7 percent reduction in the peak periods should be adequate.

Revised Text: **I-210 Westbound Ramps and Sierra Madre Villa Avenue** - If the Johnson and Johnson/Merck site is chosen, then the impacts at this intersection will need to be mitigated. This can be accomplished *either* through parking management *or* by providing two northbound to westbound left-turn lanes onto I-210.

Location: Page 4-77
Section 4.7.5.2

LA-03498

Paragraph 2

Original Text	In summary, the impacts of the SMV Park and Ride operation can be mitigated with a combination of restriping, signal timing, on-street parking restrictions, appropriate management of the Park and Ride operation and continuation of the Regulation XV program. The choice of northern or Builders Emporium site need not be determined by traffic impact issues.
Revised Text	In summary, the impacts of the SMV Park and Ride operation can be mitigated with a combination of restriping, signal timing, on-street parking restrictions, appropriate management of the Park and Ride operation and continuation of the Regulation XV program. It should be noted that parking management of the park and ride site is desirable but not required; the mitigation measures proposed will effectively mitigate the project's impacts. In addition, the choice of northern or Builders Emporium site need not be determined by traffic impact issues.

If you have any additional questions or concerns, please do not hesitate to give us a call.

Sincerely,
Echelon Industries, Inc.

Sandra S. Miller

Sandra S. Miller, P.E.
Principal Associate

SSM/kj/ LAPAS L03

LA-03498

ECHELON INDUSTRIES, INC.
19811 E. COLIMA RD., SUITE 620, WALNUT, CA 91789
PHONE: (909) 594-1891 FAX: (909) 598-3810

May 3, 1994

Mr. Harley Martin
Environmental Planner
Los Angeles County Metropolitan Transportation Authority
818 West Seventh Street, 5th Floor
Los Angeles, California 90017

RE: Pasadena-Los Angeles Light Rail Draft SEIR
Traffic Impact Analysis

Dear Mr. Martin:

We received your FAX containing the Notice of Preparation (NOP) for the Pasadena City College Community Skills Center Project Friday, April 30, 1994. We have not previously been provided any information about this proposed project and therefore it has not been included in our analysis.

If you have any additional questions or concerns, please do not hesitate to give us a call.

Sincerely,
Echelon Industries, Inc.

Sandra S. Miller

Sandra S. Miller, P.E.
Principal Associate

SSM/kj/LAPAS.L02

2.3.8.5 LRT Improvements Near Arroyo Seco Alternative Magnet School, LAUSD

LA-03498

Los Angeles County
Metropolitan
Transportation
Authority

818 West Seventh Street
Suite 300
Los Angeles, CA 90017

213.623.1194

April 21, 1994

Ms. Elizabeth Harris
Business Services Division
Los Angeles Unified School District
P.O. Box 2298
Los Angeles, California 90051

Dear Ms. Harris:

ARROYO SECO ALTERNATIVE MAGNET SCHOOL

This letter addresses our recent discussions and field trip to the Arroyo Seco Alternative Magnet School located along the Pasadena Blue Line in Highland Park.

We have enclosed two sets of full-size design drawings C-0311, C0312, C-0361, C0362, S-1401, S-1414 and S-1415 which depict the LRT improvements along the existing railroad alignment between Woodside Drive and North Avenue 49. The improvements are summarized below:

- Construction of two LRT tracks with alignment and profile as indicated on the enclosed drawings.

- Installation of drainage piping consisting of continuous underdrains to collect surface runoff within the right of way.

- Construction of retaining walls on the east side of the right of way extending from approximately 400' south of the extension of North Avenue 49 to the north end of the school playground. These retaining walls are necessary to widen the track bed for two LRT tracks and, with the proposed drainage improvements, should alleviate your concerns on slope stability. We have enclosed a letter received from our geotechnical consultant, Law/Crandall Inc., which addresses the stability of the slope.

- MTA will install a sound wall within the limits of the retaining walls discussed above either by raising the height of the wall or some other suitable treatment. The sound wall will mitigate LRV wheel noise but will not "hide" the entire vehicle.

- Right of way fencing has not yet been determined, however, this particular area would certainly warrant fencing preferably placed at the right of way line. The fencing height would be approximately 6' to 8'. MTA cannot justify your request for a 30' high fence along the playground. As you indicated, LAUSD is already considering the installation of a high fence in this area to be built on school property.

If you have any additional questions, please contact me at (213) 244-7130.

Sincerely,

ROBERT BALL, P.E.
Acting Deputy Project Manager, Engineering
Pasadena Blue Line

RB [RO5-EX250]

cc: Laurence Weldon
Erik Collett
Kathryn Lim
Clark Adams

LAW/CRANDALL, INC.
ENGINEERING AND ENVIRONMENTAL SERVICES

LA-03498
94-09694
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April 18, 1994

Mr. Erik Collett
Engineering Management Consultant
707 Wilshire Boulevard, Suite 2900
Los Angeles, California 90017

Subject: **Supplemental Recommendations for Retaining Wall RB7**
Avenue 45 to Avenue 50
Proposed Metro Pasadena Line Project
for the Los Angeles County Metropolitan Transportation Authority
Law/Crandall Project 2661.20672.0010

Dear Mr. Collett:

This letter presents foundation recommendations for the design of Retaining Wall RB7 located along the Metro Pasadena Line alignment from Avenue 45 to Avenue 50. A portion of this wall is located at the top of the slope that extends from the Arroyo Seco Alternative School to the east of the Metro Pasadena project in Highland Park. We performed a geotechnical investigation for the entire Metro Pasadena Line Project and submitted the results in a report dated June 9, 1993 (L92045.AE4).

Slope and Retaining Wall

The slope is on the eastern side of the proposed Metro Pasadena Line alignment, and currently has dense tree growth over portions adjacent to the Arroyo Seco Alternative School, especially at the base of the slope. Portions of the upper slope are less vegetated, being currently sporadically covered with seasonal weeds. There appears to be minimal control of sheet flow of water over the top of the slope. The slope generally appears to be grossly stable.

We have received plans for the proposed retaining wall from Mr. Eric A. Johnson of Willdan Associates, the Section Designer. The proposed retaining wall will be located at the top of the existing slope. The slope has an inclination that varies from about 1:1 to about 1.5:1 (horizontal to vertical). The wall will have a length of approximately 758 feet and will retain 2 to 9 feet of earth above current grade.

Recommendations

Geologic mapping during the geotechnical investigation and our closest borings to the wall area show that the existing railroad right-of-way is a filled embankment over either topsoil, older alluvium, or Puente Formation siltstone and sandstone. Because of the steepness of the existing slope, we recommend that the footings for the retaining wall be established below a plane having an inclination of 2:1 (horizontal to vertical) drawn upward from the base of the slope. This deepening of the retaining wall footings will reduce the influence of the walls and new fill on the existing slope and should not cause a reduction in the inherent stability of the slope.

There is a possibility that the soils at the elevation of the planned footing bottoms could be fill soils. We recommend that all fill soils be excavated and replaced as properly compacted fill. The proposed retaining wall may be supported on either properly compacted fill or the undisturbed natural soils. The bearing value of the soils may be assumed to be 2,500 pounds per square foot. Footings should extend at least 2 feet below the lowest adjacent grade. A coefficient of friction of 0.5 may be used between the wall footing and the supporting soils. Because of the steep slope away from the wall, we do not recommend that the passive resistance of the soils be used for lateral resistance.

The retaining wall should be designed for the lateral earth pressure as given in the geotechnical report. In addition to the recommended lateral earth pressure, the wall should also be designed for the appropriate surcharge due to the traffic or rail vehicles.

All backfill should be properly compacted. Drainage of the wall backfill should be provided to prevent the buildup of hydrostatic pressures behind the wall. Either a backdrain or weep holes should be provided. To limit the amount of water flowing on the slope, we recommend that a lined drainage ditch be constructed at the base of the wall to collect water coming from the weep holes and to convey the water to an appropriate drainage device.

If designed and constructed in accordance with these recommendations, it is our opinion that the stability of the existing slope above the school will not be significantly affected by the proposed retaining wall.

The professional opinions presented in this letter have been developed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable geotechnical consultants practicing in this or similar localities. No other warranty, expressed or implied, is made as to the professional advise included in this letter.

Please call if there are any questions regarding this letter.

Sincerely,

LAW/CRANDALL, INC.

M. Shahabi

Mike Shahabi
Project Engineer

Marshall Lew

REGISTERED PROFESSIONAL ENGINEER
MARSHALL LEW
No. 522
Exp. 3-31-95
GEOTECHNICAL
STATE OF CALIFORNIA

Marshall Lew, Ph.D.
Principal Engineer
Vice President

661/20672-10.L11/ymc

(2 copies submitted)

cc: Engineering Management Consultant
Attn: Mr. Bomi Ghadiali

SECTION 3.0
PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES COMMENTING ON THE DRAFT SEIR

3.1 COMMENT LETTERS

Copies of all the letters received by the LACMTA commenting on the DSEIR are presented on the following pages. They consist of the following:

Public Agencies

City of Los Angeles, Department of Public Works, Bureau of Engineering (two letters)
City of Pasadena (six letters and memoranda)
City of South Pasadena
California Department of Transportation
California Public Utilities Commission

Businesses

John Caldwell Design, South Pasadena
Kevin Michael Studio, Pasadena
Lacy Street Production Center, Los Angeles
Legal Aid Foundation of Los Angeles
T.A. Nelson, P.E., Consulting Engineer

Private Organizations

Citizens Committee to Save Elysian Park, Los Angeles
Los Angeles Unified School District
Neighborhood Information Network, Pasadena
Pasadena Heritage

Individuals

George W. Sabin

LA-03498

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RICHARD J. RIORDAN
MAYOR

DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING
ROBERT S. HORII
CITY ENGINEER

650 SOUTH SPRING ST., SUITE 200
LOS ANGELES, CA 90014-1911

MAY 09 1994

Mr. James Sowell, Manager
Environmental Compliance
Los Angeles Metropolitan Transportation Authority
818 West 7th Street, Suite 500
Los Angeles, CA 90017

Dear Mr. Sowell,

METRO PASADENA PROJECT - DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT - W.O. E1900042

We have completed our review of the Draft Supplemental Environmental Impact Report (SEIR) for this project. Please address the following comments in the Final SEIR:

1. The relocation of sanitary sewer at Marmion Way and Figueroa Street will have significant impacts on neighborhood traffic circulation, parking and private driveway access along the proposed route. This relocation route will include portions of Pasadena Avenue, French Avenue, Marmion Way, Loreto Street and Figueroa Street (see attached plan). Due to the magnitude of these impacts, the Mitigation Measures of the original EIR are inadequate and need to be augmented in the SEIR.

2. The SEIR mitigation of impacts to Marmion Way between Avenues 50-58 are inadequate. Mitigation Measures should include all improvements shown on the 85% Submittal Drawings for the Arroyo Seco to Los Angeles River - C6420 Contract.

Please refer any questions to Mike Stafford at (213) 847-5040 or Mark Chmielowiec at (213) 847-5042.

Sincerely,

Robert S. Horii
City Engineer

by Gene D. McPherson DWA

Gene D. McPherson
District Engineer
Central Engineering District

MHS/MG-GG1-97
Enclosure
cc: Joe Kennedy, LADOT - STOP 599
Project Management Division, Attn: Karen Johnson - STOP 939
Dave Simpson, Utility Coordinator
Los Angeles Metropolitan Transportation Authority
P.O. Box 194, Los Angeles, CA 90053

ADDRESS ALL COMMUNICATIONS TO THE CITY ENGINEER

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MAYOR

LA-03498

DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING
ROBERT S. HORII
CITY ENGINEER
650 SOUTH SPRING ST., SUITE 800
LOS ANGELES, CA 90014-1911

Date: MAY 09 1994

Mr. James L. Sowell
Los Angeles County Metropolitan
Transportation Authority - Rail Construction
818 West 7th Street, Suite 300
Los Angeles, CA 90017

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 7
To James Sowell	From Karin Johnson
Co.	Co.
Dept.	Phone # 847-8699
Fax # 244-6000	Fax #

Dear Mr. Sowell:

COMMENTS ON THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (DSEIR) FOR THE PASADENA-LOS ANGELES RAIL TRANSIT PROJECT

Thank you for the opportunity to comment on the above referenced document. The following comments have been prepared by staff of the Bureau of Engineering:

The DSEIR did not include a discussion of the impacts associated with the relocation of 14-, 18-, and 24-inch city trunk sewers in conjunction with the Figueroa Street at Marmion Way grade separation.

The DSEIR should include an analysis of additional impacts on traffic and the surrounding areas that would be associated with street vacations and utility relocations.

Please see the attached document entitled "Stormwater Considerations for CEQA Analyses" for information regarding stormwater permit requirements. Construction sites five or more acres in size require a stormwater permit if construction activities disturb soils.

As you are probably already aware, the City of Los Angeles Community Redevelopment Agency (CRA) is proposing to rehabilitate the Ziegler House (4601 North Figueroa Street), a City of Los Angeles Historic-Cultural Monument. The building will be used as a child care center. The CRA's proposal includes a small parking lot adjacent to the proposed Southwest Museum station. Plans for the Southwest Museum station and child care center should be coordinated.

If you have any questions, please contact Karin Johnson at (213) 847-8699.

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LA-03498

Sincerely,

ROBERT S. HORII
City Engineer

By Neil Drucker for

STEPHEN B. HOUCK
Acting Division Engineer
Project Management Division

RSH/SBH/kj
A:let/blue

Attachment: Stormwater Considerations for CEQA Analyses

cc: Ray Saidi, LD&M
Stop 901

Mike Stafford, Central District
Stop 494

STORMWATER CONSIDERATIONS FOR CEQA ANALYSES

Introduction

Several items in the California Environmental Quality Act (CEQA) Initial Studies Checklist address potential impacts to stormwater[1]. These items include: Section I, Earth, items (e) and (f); Section III, Water, items (a)(b)(c)(e)(g) and (i); and Section XVI, Utilities and Service Systems, item (e)[2].

Historically, analysis of stormwater impacts in CEQA documents has typically been limited to impacts to natural watercourses where riparian systems may experience adverse effects from the project, or to flood hazard effects of a project. Recent heightened public awareness of stormwater issues, including the heavy pollutant loads present in most urban runoff, indicates a need for more comprehensive and detailed consideration in CEQA analyses of impacts to stormwater, and for more attention to appropriate mitigation measures.

In addition to increased public awareness of stormwater issues, amendments to the Federal Water Pollution Control Act of 1972, commonly referred to as the Clean Water Act (CWA), established permit requirements for stormwater discharges from a variety of sources. This narrative has been prepared by the City of Los Angeles Bureau of Engineering to offer some guidance for CEQA analyses of stormwater impacts, and to summarize some of the stormwater permit requirements. Sources of additional information are included at the end of this document.

National Pollution Discharge Elimination System (NPDES)

Discharge of pollutants into waters of the United States via stormwater is prohibited by the CWA. Section 402 of the CWA sets forth the requirements for NPDES permits (required for most discharges into water bodies). Congressional reauthorization of the act in 1987 established the NPDES provisions governing stormwater discharges from municipal, industrial and commercial sites. NPDES permits for "non-point" discharges from these types of sites (such as sheet-flow off of a parking lot) are commonly referred to as "stormwater permits". In California the State Water Resources Control Board (SWRCB) has the authority to administer the NPDES program on behalf of the U.S. Environmental Protection Agency.

The SWRCB has issued "general" NPDES permits for construction activities and for certain types of industrial and commercial operations. Although it is possible to apply for an individual permit, the general permits reduce the amount of time and expense required to comply with the NPDES provisions of the Clean Water Act. In addition, an application for an individual permit may be denied, whereas coverage under the general permits is automatically assured if the permits' provisions are followed.

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[1] Impacts to "stormwater" include the storm drainage infrastructure, flows carried within it, and the receiving water bodies (surface or subterranean).

[2] A revised Initial Study Checklist is included in the "Supplementary Information" section of the 1992 revision of the CEQA Guidelines that expands the old item XVI to include service systems as well as utilities, and to list six specific sub-categories, including sub-category (a), "Storm water drainage".

General Construction Activity Stormwater Permit (GCASP)

A NPDES permit is required for construction activities that disturb soils, including clearing, grading, or excavation, if the total construction site is five or more acres in size. In general, the GCASP permits the stormwater discharges from a construction site, and prohibits non-stormwater discharges[3] and any discharges containing reportable quantities of hazardous substances[4]. Permitted stormwater discharges are not restricted by numerical effluent limitations. Instead, dischargers are required to implement "appropriate pollution prevention control practices and/or Best Management Practices (BMPs)". Compliance with the GCASP consists of three basic steps.

First, a Notice of Intent (NOI) must be filed with the SWRCB in Sacramento, along with a $250.00 filing fee[5]. The NOI notifies the state that the applicant intends to begin construction, and that they will comply with the provisions of the GCASP. The NOI must be filed before construction commences[6]. Filing of the NOI completes this step -- the SWRCB will not "approve" or "deny" the NOI. The GCASP must remain in force until construction is completed. Failure to comply with NPDES requirements can result in fines of $25,000 per day of violation and imprisonment.

Secondly, a Stormwater Pollution Prevention Plan (SWPPP) must be prepared. This report must describe the construction site, identify potential sources of pollution and potential receptors, and describe the BMPs which will be used to control pollutants, both during construction, and post-construction. Within the context of CEQA, BMPs are roughly equivalent to mitigation measures. The SWPPP must be completed before construction commences. It is not necessary to file or seek approval of the SWPPP, however, the SWPPP must be available at the construction site at all times, and construction activities must follow the plan.

Lastly, at the completion of construction, a Notice of Termination must be filed with the SWRCB in Sacramento.

General Industrial Stormwater Permit (GISP)

A NPDES permit is required for certain types of industrial and commercial sites. In general, the types of activities which require permits are listed in 40 Code of Federal Regulations (CFR) Section 122.26(b)(14) (Federal Register, Volume 55, pages 48065-66). However, the Regional Water Quality Control Boards (RWQCBs) have the authority in California to require NPDES permits for any appropriate facility, regardless of the federal requirements.

Whereas the GCASP is oriented mostly towards short-term construction related impacts, the GISP addresses long-term operation of certain types of facilities. Compliance requirements are similar for both of the General Permits. The NOI for the GISP must be filed at least 30-days prior to operating new facilities. A SWPPP is also required. As with the GCASP, the primary focus

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[3] Although non-stormwater discharges are prohibited by the GCASP, exceptions are provided for certain discharges that are infeasible to eliminate, including: irrigation for erosion control, pipe flushing, street washing, and dewatering. Although these discharges are not prohibited, there are restrictions: BMPs must be utilized, water quality standards may not be violated, and other applicable permitting requirements must be observed (i.e. RWQCB permits for dewatering).

[4] "Reportable quantities" of hazardous substances is specified in 40 CFR §117.3 and §302.4.

[5] The annual fee is $250 in most of Los Angeles County, including all of the City of Los Angeles. In other parts of the state, which are not covered by a Municipal NPDES Permit, the annual fee is $600.

[6] There is no specified time limit for filing, other than "before" construction commences. The SWRCB will send a letter containing a discharger identification number to confirm their receipt of the NOI. To assure compliance, this letter should be received before construction commences.

is on identifying and implementing BMPs to reduce/eliminate potential pollution of receiving waters. One major difference is a requirement in the GISP to monitor the effectiveness of the BMPs by collecting and analyzing stormwater runoff from the site.

CEQA Analyses, BMPs, and Mitigation Measures

As with most potential impacts, stormwater impacts fall into two general categories: short-term construction related impacts, and long-term operational impacts. In most cases it should be possible to use BMPs to mitigate any potential short-term construction impacts so that they are not significant. There are also BMPs to address many long term impacts. In general, BMPs can be also be divided into two categories: structural, and non-structural. Whereas structural BMPs involve construction of a facility or device of some kind, non-structural BMPs focus on procedures and practices.

Short-term Construction Impacts and BMPs

For projects subject to the GCASP, proper compliance will mitigate most potential short-term impacts to acceptable levels. Any construction site contains a variety of materials which are potential sources of stormwater pollution. The other major source of stormwater pollution common to many construction sites is earth moving activities.

Categories of construction materials containing pollutants include: adhesives; cleaning agents; landscaping, plumbing, painting, heating/cooling, and masonry materials; floor and wall coverings; demolition debris; and construction equipment, vehicles, and maintenance supplies. Routine safety precautions for handling and storing toxic and hazardous materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common-sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

The second major pollutant is sediment, typically produced by wind or water erosion. Grading and brush clearing activities can greatly increase erosional processes. Two general strategies should be used to mitigate erosion. First, BMPs should be designed and implemented to limit the amount of exposed soil and to control those areas which must be exposed. Trenching or grading activities should be phased so that trenches are backfilled, and graded areas are landscaped or otherwise covered, as quickly as practical. Appropriate dust suppression techniques, such as watering or tarping, should be used in areas which must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. Many of the common mitigation measures for controlling fugitive dust emissions are also effective stormwater BMPs. Construction entrances should be designed to facilitate removal of debris from vehicles exiting the site, by passive means such as paved/gravelled roadbeds, and/or by active means such as truck washing facilities. Loads should be tarped. If necessary, roadways should be swept or washed down to prevent generation of fugitive dust by local vehicular traffic. Simple sediment filters should be constructed at or near the entrances to the storm drain system wherever feasible.

For construction sites of five or more acres, the required SWPPP will effectively address these types of impacts, and the appropriate BMPs. Although it is not required, a draft of the SWPPP can be included as an appendix to the CEQA document. This procedure can simplify the regulatory burden combining the development of CEQA-mandated mitigation measures with NPDES requirements to develop BMPs. Circulation will provide interested regulatory agencies with an opportunity to contribute constructive comments or indicate potential conflicts. At the very least, BMPs should be included in the Mitigation Monitoring/Reporting Plan within the final

CEQA document. For large projects, inclusion of BMPs in the projects plans or specifications will ensure that the contractor has been notified about required compliance procedures and avoid potentially costly change orders, delays, or penalties.

Long-term Operational Impacts and BMPs

Two basic areas of concern are stormwater quality, and quantity. BMPs that implement good housekeeping procedures, such as regular sweeping of paved areas, can be used to address quality concerns. BMPs that address design considerations, such as channeling runoff from paved areas into landscaped areas, can effectively address both quality and quantity considerations. In general it is desirable to: minimize the amount of paved area, use permeable types of paving materials whenever possible, design on-site drainage to move water into landscaped areas, and grade landscaped areas to maximize the retention of runoff.

The SWPPP for the GISP should also address issues relevant to the CEQA document, and identify BMPs that mitigate potential effects. However, since the main focus of the GISP is on stormwater quality, rather than quantity, it may be necessary to provide additional discussion of quantity issues in the CEQA document, beyond that contained in the SWPPP. Alternatively, BMPs oriented towards quantity control could be included in the SWPPP. As mentioned above, BMPs which limit the runoff generation from a project site often provide mitigation with respect to quality concerns as well.

Any increase in the ratio of impermeable to permeable surfaces at the site is likely to result in increased runoff. Much of the Los Angeles River, and other parts of the flood control system, are subject to flooding during design storms[7]. Therefore, an increase in runoff in one part of the drainage basin may contribute to flooding somewhere in the basin. As previously stated, thresholds of significance regarding stormwater impacts are poorly defined. However, regardless of the level of significance, the CEQA document should identify feasible mitigation measures (BMPs) available to maximize on-site retention/detention of stormwater. These BMPs can reduce the flooding potential by decreasing or shifting the timing of peak flows, and enhance runoff quality by allowing sediments to settle-out.

Summary

Federal NPDES stormwater permits are required for certain construction activities and industrial and commercial facilities. Compliance requires the development and implementation of BMPs to the maximum practical extent. Stormwater BMPs are functionally equivalent to CEQA mitigation measures. At this time there is very little clear guidance available to determine whether a project's impacts on stormwater are "significant". However, BMPs as required by the GISP and GCASP, and mitigation measures as required by CEQA have the same common objective of eliminating adverse impacts to the extent feasible. In most cases, a SWPPP which fulfills the NPDES permit requirements will provide an analysis of potential stormwater impacts and mitigation measures (BMPs), that are sufficient for CEQA purposes. BMPs that satisfactorily address NPDES permit standards regarding runoff will in most cases mitigate potential stormwater impacts to levels that are not significant. The time and expense required for regulatory compliance may be reduced by including a draft SWPPP in the CEQA document.

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[7] System deficiencies are identified in the Army Corps of Engineers Los Angeles County Drainage Area Review (December, 1991). For the Los Angeles River the Corps uses a "100-year" design storm. This is the theoretical storm event which has a statistical probability of occurring once in a 100 year period.

References and Sources of Information

California Storm Water Best Management Practice Handbook(s)
This is a series of three handbooks which address the three types of General NPDES permits available in California (Municipal, Construction, and Industrial). Each handbook includes detailed descriptions of BMPs. Prices range from $12 to $13, plus shipping and handling. To purchase one or more handbooks, contact:

Blue Print Service
1700 Jefferson Street
Oakland CA 94612

Phone (510) 444-6771
Fax (510) 444-1262

State Water Resources Control Board (SWRCB)
The SWRCB should be contacted if you have any questions about the GCASP or the GISP. Also, NOI's must be filed with the SWRCB.

State Water Resources Control Board
Division of Water Quality
Attention: Storm Water Permit Unit
P.O. Box 1977
Sacramento CA 95812-1977

Phone (916) 657-0919 Industrial Activities Stormwater Permits
Phone (916) 657-1146 Construction Activity Stormwater Permits

Regional Water Quality Control Board (RWQCB)
The RWQCB for the Los Angeles Region should be contacted regarding any specific water quality considerations.

California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park CA 91754

Phone (213) 266-7500

City of Los Angeles Bureau of Engineering
For questions regarding CEQA documents and/or comments on this document:

Environmental Management Section
Attention: Stormwater Unit
650 South Spring Street, Ste 600
L.A. CA 90014-1915

Phone (213) 847-8619

For questions regarding the City's stormwater drainage infrastructure:

Central District	(213) 847-8516	Carl Mills
Harbor District	(310) 548-7454	Patrick Gibbons
Valley District	(818) 989-8431	George Groves
West L.A. District	(310) 575-8528	Henry Galle

For questions regarding the City's Municipal NPDES Permit:

Stormwater Management Division (213) 847-6350

LA-03498

City of Pasadena

100 NORTH GARFIELD AVENUE
P.O. BOX 7115. PASADENA. CA 91109-7215

ZONING AND SUBDIVISION
ADMINISTRATION
ROOM 102

May 9, 1994

Mr. James L. Sowell,
Manager, Environmental Compliance
Los Angeles County Metropolitan Transportation Authority
818 W. 7th Street, Suite 500
Los Angeles, CA 90017

Dear Mr. Sowell:

Thank you for the opportunity to review and comment on the 2nd Draft SEIR for the Pasadena-Los Angeles Rail Transit Project. Comments on this document are directed primarily towards the impacts of the proposed 1,000 car park and ride facility in East Pasadena at either the Johnson and Johnson site or the former Builder's Emporium.

Since the project's impact on historic/cultural resources is a primary environmental impact affecting the City of Pasadena, as a preliminary to my comments portions of AB 2881 which became effective January 1, 1993 are quoted. AB 2881 addresses historical resources and the California Environmental Quality Act (CEQA). The 2nd Draft SEIR is inadequate because it does not consider alternatives at the Johnson and Johnson site to demolishing the structure.

Section 5021.1 of the Public Resources Code

> (j) "Historical resource" includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

Section 21084.1 of the Public Resources Code with emphasis added.

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

ister of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant criteria set forth in (g) of Section 5024.1, are presumed to be historically or culturally significant for the purposes of this section, unless the preponderance of evidence demonstrates that the resource is not historically or culturally significant. The fact that the resource is not listed in or determined to be eligible for listing in, the California Register of Historic Resources, not included in the local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5042.1 shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of this section.

Project Description

The project Description is inadequate as it does not describe the existing landscaping of the current site nor the layout, ingress, egress, and landscaping of the proposed park and ride facility at the Johnson and Johnson site. Further there is no discussion of a parking structure at the Builder's Emporium site. This site is much smaller than the Johnson and Johnson site and probably could not accommodate 1,000 surface parking spaces. The project description does mention that the park and ride facility will be lighted at night but mentions no shielding of light to prevent spillover on adjacent properties. There is also no discussion of how commuters would get from their cars to the station.

Impacts

Impacts from using the Johnson and Johnson site for a park and ride facility include but may not be limited to air, water, plant life, light and glare, land use, transportation/circulation and cultural resources. Impacts from using the Builder's Emporium site would probably involve possible impacts from building a parking structure which could have shade/shadow impacts. Due to the inadequate project description it is not possible to fully analyze all project impacts on the environment.

Air could be an impact if the existing structures and landscaping at the Johnson and Johnson site are removed and replaced with asphalt for 1,000 surface parking spaces. The absence of landscaping, the increased impermeable surface absorbing and reflecting sunlight and heat will increase the temperature on the site.

Water is an impact at the Johnson and Johnson site, due to the increase in impermeable surface and subsequent increase in water runoff. The quality of water run off would also be degraded by containing high amounts of oil derived residues from cars.

Plant life is an impact since it appears the landscaping will be removed at the Johnson and Johnson site. This landscaping is also part of the significance of the structure. It was designed by a well known landscape architect in cooperation with the architect of the building(s). As part of the park and ride

facility, there was no mention of any landscaping which could provide shade, help filter the car emissions and moderate the heat island effect of a large surface parking lot.

Light and glare can be an impact both from the absence of shade, if there is no structure, and absence of landscaping planned on the Johnson and Johnson site. There will be glare reflected off the parked cars. The night lighting may spillover onto adjacent uses. There was no discussion of shielding the night lighting or of lessening daytime glare from both the cars and the presumed open surface parking lot.

Land use is an impact since it does not appear that the proposed park and ride facility conforms with the intent of the newly adopted Land Use and Mobility Elements. The Johnson and Johnson site is in the E. Pasadena Specific Plan Area which encourages institutional (particularly child care), commercial and industrial uses. There is no mixed development proposed on the site using the existing structure and constructing a parking structure as an alternative to demolishing the existing building and landscaping. Various policies and objectives in the newly adopted elements encourage both transit and pedestrian oriented development. There appears to be no provision of any pedestrian amenities at either proposed park and ride site. Motorists would be pedestrians between their cars and their walk to the light rail station. Would commuters walking from home or bus stops be accessing the light rail station through the park and ride facility?

Transportation/circulation is a possible impact since transfers between different modes of transportation are not adequately discussed.

Cultural resources is an impact if the Johnson and Johnson structure and landscaping is demolished and if the Craftsmen houses in Highland Park are demolished. No alternatives to clearing the Johnson and Johnson site and still using the site for a park and ride facility were discussed.

I have attached staff comments from both the Traffic Engineer and the Light Rail Project Coordinator of the City's Transportation Division of the Public Works and Transportation Department.

If you have any questions regarding my comments, I may be reached at the Current Planning Section of the Planning and Permitting Department, (818) 405-4152. If you have questions regarding the comments of the Traffic Engineer, please contact Keil Maberry, Associate Traffic Engineer at (818) 405-4191. If you have any questions regarding the comments of the Light Rail Project Manager, please contact John Jontig at (818) 577-6134.

Sincerely,

Nancy B. Key

Nancy B. Key, AICP
Sr. Planner

CC: Denver Miller, Environmental Administrator-Current Planning
Jeff Cronin, Principal Planner-Design
& Historic Preservation
John Jontig, Light Rail Manager-
Works & Transportation Dept.
Minder Day, Principal Traffic Engineer-Public Works & Transportation Dept.
Laura Dahl, Sr. Planner-Advance Planning
Keil Maberry, Assoc. Traffic Engineer -
Public Works & Transportation Dept.

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LA-03498

DRAFT

MEMORANDUM - CITY OF PASADENA
Public Works and Transportation Department

DATE: May 9, 1994

TO: Nancy Key
Senior Planner, Environmental
Current Planning

FROM: John Jontig

RE: SEIR – PASADENA-LOS ANGELES LIGHT RAIL TRANSIT PROJECT

Pasadena Light Rail Project staff has reviewed the SEIR for the Pasadena-Los Angeles Light Rail Transit Project.

1. The City of Pasadena prefers and recommends the J & J-Merck site for station access and park and ride garage for the station at Sierra Madre Villa. The former Builders Emporium site is now occupied by a new business, Orchard Hardware Supply, and is believed to have an unwilling seller. Condemnation costs plus relocation of a major business would prove to be prohibitive.

2. The Los Angeles to east Pasadena Light Rail Transit Project is the first phase of what is expected to be light rail service east to Irwindale or Azusa within or adjacent to the 210 Foothill Freeway corridor. The requirement of a 1000 car park and ride garage is so sized as the Sierra Madre Villa location will be the interim terminal station.

   The City requests that the SEIR consider any environmental impacts to the Sierra Madre Villa site that would occur if the 1000 car park and ride garage were reduced in size due to the relocation of the light rail terminal to the east.

   There is information (MTA preliminary surface parking drawing) that indicates the MTA may intend to take two parcels (A and B) in addition to the J & J-Merck property at the Sierra Madre Villa site.

   Parcel A at the corner of Foothill Boulevard and Halstead Street contains a business that has recently spent a great deal of money in upgrading the property and business. It would be environmentally detrimental to replace an upgraded building and business with surface parking.

It is the City's understanding that the property owner is unwilling to sell thus a take by condemnation would be required. That action would be very costly to the MTA to cover property, business and relocation costs. A garage structure appears to be environmentally and financially sound.

3. The City is concerned about the possible problems cased by horn and operational noise of light rail transit in residential neighborhoods along the alignment including some within Pasadena. There is particular interest in horn sounds reverberating in parts of the City. The frequency and sound quality of the horns is also of concern. The City would like to continue to work with the MTA on mitigation efforts to reduce noise problems. We request that the SEIR address these environmental concerns.

4. Pasadena Traffic Engineering staff has reviewed the Transportation and Circulation portion of the SEIR for the Pasadena-Los Angeles Light Rail Transit Project. Staff will only comment on the Sierra Madre Villa Park and Ride Facility. The following are staff's comments:

   While the mitigation provided in the SEIR appears to meet the requirements of the City of Pasadena it is recommended that the mitigations be revised as follows to ensure they appropriately address the traffic mitigations to the Foothill Boulevard traffic. Traffic control signals will have to be modified at the impacted intersections in order to make the mitigations work.

SECTION 4.7.5.2: SIERRA MADRE VILLA PARK AND RIDE: Staff agrees with the analysis for determining which intersections will be significantly impacted by this project. Several mitigation measures will have to be revised as follows:

1. **Halstead Street and Foothill Boulevard:** The mitigation recommended is not applicable to the needs of the Light Rail Park and Ride Facility. Beginning with the second sentence, the paragraph should be revised to read "*This can be accomplished by widening Halstead Street four feet from Foothill Boulevard south to the cul-de-sac to provide dual northbound left-turn lanes including protected left-turn signal phases for all directions and restriping the southbound approach to provide an exclusive right-turn lane. The eastbound approach should be restriped to provide for a minimum 100 foot long exclusive right-turn lane. The eastbound approach should be restriped to provide for a minimum 100 foot long exclusive right-turn lane. This will require removing some parking along the south side of Foothill Boulevard. Signal timing changes and detector placements should be considered at the time of restriping.*" The ICU calculations should be revised to show this mitigation (use 2880 vehicles/hour capacity for the dual left-turn).

2. I-210 West-Bound Ramps and Sierra Madre Villa Avenue: Parking management may create a reduction during the peak periods, but for the purpose of providing quantitative mitigation, the mitigation should be to provide dual northbound left-turn lanes onto the I-210 Freeway.

GENERAL COMMENT: The intersection of Rosemead Boulevard and Colorado Boulevard is not in the City of Pasadena and should be reviewed the County of Los Angeles. As a comment regarding the recommended mitigation, providing an additional through lane is only valid when the new lane can be carried for a considerable distance in order to truly provide additional link capacity.

JOHN JONTIG
Light Rail Project Manager

JJ:SP
KEY.SHK

LA-03498

City of Pasadena

100 NORTH GARFIELD AVENUE
P.O. BOX 7115, PASADENA, CA 91109-7215

ZONING AND SUBDIVISION
ADMINISTRATION
ROOM 102

May 9, 1994

Mr. James L. Sowell,
Manager, Environmental Compliance
Los Angeles County Metropolitan Transportation Authority
818 W. 7th Street, Suite 500
Los Angeles, CA 90017

Dear Mr. Sowell:

I have attached comments from the City's Cultural Heritage Commission, Design Commission and Transportation Advisory Commission.

If you have any questions regarding the comments of the Design or Cultural Heritage Commissions please contact Jeffrey Cronin, Principal Planner of the Design and Historic Preservation Section of the Planning and Permitting Department, (818) 405-4228. If you have any questions regarding the comments of the Transportation Advisory Commission, please contact Terri Slimmer, Transportation Coordinator at (818) 405-4191.

Sincerely,

Nancy B. Key

Nancy B. Key, AICP
Sr. Planner

CC: Denver Miller, Environmental Administrator-Current Planning
Jeff Cronin, Principal Planner-Design & Historic Preservation
Mary Jo Winder, Sr. Planner-Design & Historic Preservation
Brad Smith, Sr. Planner-Design & Historic Preservation
Terri Slimmer, Transportation Coordinator Public Works & Transportation Dept.

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LA-03498

City of Pasadena

100 NORTH GARFIELD AVENUE
P.O. BOX 7115, PASADENA, CA 91109-7215

URBAN CONSERVATION
ROOM 111
(818) 405-4228

Memorandum

TO: Los Angeles County Metropolitan Transit Authority Environmental Compliance Office
From: City of Pasadena Cultural Heritage Commission
Subject: Draft Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Project
Date: April 19, 1994

At a public meeting held on April 18, the Cultural Heritage Commission reviewed the draft supplemental environmental impact report for the Pasadena-Los Angeles Light Rail Project and voted unanimously to forward the following statement and list of concerns to the Los Angeles County Metropolitan Transit Authority.

We have read and reviewed with great concern the Draft Supplemental Environmental Impact Report (DSEIR) for the Los Angeles-Pasadena Light Rail Project, especially those sections pertaining to the creation and location of the East Pasadena Park-and-Ride Facility. The major area of concern is the proposed demolition of the Johnson & Johnson/Merck Building, historically known as the Stuart Pharmaceutical Building.

The Cultural Heritage Commission unanimously supports the retention and preservation of the Stuart Pharmaceutical Building. Furthermore, this recommendation is based on the historical and cultural significance to the City of Pasadena, and the strong belief that the historically significant portions of the building can be adaptively used to the betterment of the design and function of the proposed light rail station and retain this site as a cultural resource in the East Pasadena community.

Nationally, when we look at interstate travel - and intrastate travel within California - railroad and light rail stations have become transportation centers, creating an active area and synergy that extend beyond the movement of the trains. While not initially used as a train station, the Stuart Building offers the opportunity to establish a similar setting for the East Pasadena site. With an internationally acclaimed building, the MTA has the possibility, if not the mandate, to provide the community with something more than a vast "sea of asphalt and automobiles."

The adaptive reuse of the building will provide additional business uses, extend the hours of the building, create interest in light rail, provide a more celebratory travel experience, and maintain an asset to the city of national significance.

The DSEIR identifies the Johnson and Johnson/Merck Building as a cultural resource; however, it errors greatly in proposing mitigation measures for the loss of such an important building. And, the DSEIR offers no alternative to demolition, despite existing real estate studies offering many options.

In closing we urge that MTA not only consider the reuse of the building, but review existing adaptive re-use studies. With the use of the Santa Fe Depot and the Stuart Building, the City of Pasadena would have two great transportation centers. These two centers will reflect the growth of the city from an early resort center to a high-tech industrial center for the space age. The East Pasadena area would retain a landmark and community asset and the light rail would have wonderful entrance to the city.

Specifically, our concerns with the DSEIR are:

1. [Pg. 2-5, 4-96] Demolition of the Johnson & Johnson/Merck building (historic name: Stuart Pharmaceutical Company) at 3360 East Foothill Boulevard, Pasadena, would be a significant unavoidable environmental effect that could not be mitigated to a level of insignificance by photography, measured drawings, and oral histories. The demolition should be listed on pg. 5-1 under the category of significant unavoidable environmental effects.

2. [Pg. 4-89] The paragraph describing the work of Edward Durell Stone has inaccuracies (e.g., "rare example of the New Formalism style of architecture," "industrial architecture," Waldorf-Astoria Hotel).

3. [Pg. 4-90] Pasadena Heritage, a private community organization, *not* the Cultural Heritage Commission, has nominated the Johnson & Johnson & Johnson/Merck building for listing in the National Register of Historic Places.

4. [Pg. 4-16, 4-92] Under air quality, the environmental analysis identifies the demolition of a "maximum of seven buildings at the proposed Johnson & Johnson/Merck site" and describes demolition of seven buildings as a "worst case scenario." Subsequently, under cultural resources, the report notes - unequivocally - "all of the buildings would be subject to demolition." Which statement is correct?

5. A decision about the National Register nomination is not the only measurement of the significance (or "status") of the Johnson & Johnson/Merck building (and findings of "exceptional significance," well beyond the thresholds for the California Environmental Quality Act, are required to list a cultural resource under fifty years old in the National Register). In 1992, the City of Pasadena's Cultural Heritage Commission determined that the building met the criteria for designation as a City "treasure" (a higher category of local landmark). Moreover, two extensively researched reports and numerous letters from scholars across the country attest to the importance of the building.

   Given this evidence, the Commission disagrees with the conclusion that a "conservative approach" to mitigation is necessary only while the National Register nomination is pending.

   The mitigation plan cannot be linked to the possibility of actual "listing" in the Register. The building will *not* be listed in the Register because the property owners have formally objected to the nomination. At this point, the State Historical Resources Commission may only forward a recommendation to the National Park Service, the agency which ultimately determines eligibility for listing.

6. The report does not consider alternatives to the proposed demolition of the building at 3360 E. Foothill Blvd. According to the Public Resources Code of the State of California (California Environmental Quality Act, Sec. 15126), an EIR should discuss "a range of reasonable alternatives to the project....[including] alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The report apparently considers the site formerly occupied by Builder's Emporium as the alternative project. Yet, it omits any discussion of adaptive reuse of the Johnson & Johnson/Merck building or of constructing a multi-level parking structure as an alternative to surface parking.

7. Until release of the supplemental EIR, the understanding of the Commission was that the Metropolitan Transit Authority would explore adaptive reuse of the historic building. A March 1993 adaptive reuse study of the site (by Halcyon Real Estate Advisors/Ernst & Young) considered eight options. Two of these options proposed integrating the historic building into new development accompanying the Sierra Madre Villa light rail station. This study recognizes that adaptive reuse of the building in connection with a light rail station would be difficult because of "surface traffic issues," but no analysis of adaptive reuse or the obstacles posed by traffic circulation are included in the EIR.

8. [Pg. 4-82] The locations of sound barrier walls within Pasadena are not identified in the report. At heights of four or eight feet, these walls could have an adverse visual impact on historic resources (especially if proposed for locations within the Old Pasadena National Register District).

Respectfully,

Robert P. Kneisel

Robert Kneisel, Chair

LA-03498

City of Pasadena

100 NORTH GARFIELD AVENUE
PASADENA, CA 91109-7215

PLANNING DIVISION
URBAN CONSERVATION SECTION
CITY HALL, ROOM 111
(818) 405-4828

(818) 405-3958 FAX
(818) 405-4371 (TDD)

MEMORANDUM

TO: Metropolitan Transportation Authority Environmental Compliance Office
FROM: Design Commission, City of Pasadena
RE: Comments on Draft Supplemental Environmental Impact Report, Pasadena-Los Angeles Light Rail Project
DATE: April 27, 1994

On April 25, 1994, the Design Commission reviewed portions of the draft supplemental EIR (dated march 25, 1994) relating to the City of Pasadena. The Commission subsequently voted to forward the following comments and recommendations to the City Council and to the Metropolitan Transportation Authority:

1. [Pg. 1-7] The supplemental EIR contends that the light rail project would have no significant effects on plant life, light and glare, and aesthetics. The introduction of a surface parking lot for 1,000 cars at the Sierra Madre Villa station, however, would have potentially significant effects on plant life, light and glare, and aesthetics. The parking facility, for example, would affect plant life by removing mature landscaping on the grounds of the Johnson & Johnson/Merck building. Among the notable plant life on these grounds are Mediterranean fan palms and cypress trees, orange trees, and olive trees. The illumination of 10 acres of surface parking might cause substantial light and glare, and nine acres of surface parking would visually degrade the area.

2. [Pg. 2-5, 4-96] Demolition of the Johnson & Johnson/Merck building (historic name: Stuart Pharmaceutical Company) at 3360 E. Foothill Boulevard, Pasadena, would be a significant unavoidable environmental effect that could not be mitigated to a level of insignificance by photography, measured drawings, and oral histories. The demolition should be listed on pg. 5-1 under the category of significant unavoidable environmental effects. The building and its grounds are a noted work of the internationally renowned architect, Edward Durell Stone (1902-1978), and the distinguished landscape architect, Thomas D. Church (1902-1978).

3. [Pg. 3-10] The report indicates that the Sierra Madre Villa park-and-ride facility requires 1,000 spaces. It does not, however, describe the facility in any further detail. Previous studies from the Metropolitan Transportation Authority proposed (for the Johnson & Johnson/Merck site) a three-story or five-story parking structure adjacent to the Foothill Freeway. An alternative study proposes a nine-acre, surface parking lot. Without a physical description of the park-and-ride facility, no assessment of environmental effects (notably the three concerns previously cited) is possible.

4. [Pg. 4-16, 4-92] Under air quality, the environmental analysis identifies the demolition of a "maximum of seven buildings at the proposed Johnson & Johnson/Merck site" and describes demolition of seven buildings as a "worst case scenario." Subsequently, under cultural resources, the report notes - unequivocally - "all of the buildings would be subject to demolition." Which statement is correct?

5. The report does *not* consider alternatives to the proposed demolition of the building at 3360 E. Foothill Blvd. According to the Public Resources Code of the State of California (California Environmental Quality Act, Sec. 15126), an EIR should discuss "a range of reasonable alternatives to the project....[including] alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The report apparently considers the site formerly occupied by Builder's Emporium as the alternative project. Yet, it omits any discussion of adaptive reuse of the Johnson & Johnson/Merck building or of constructing a multi-level parking structure as an alternative to surface parking.

6. [Pg. 4-82] The locations (if any) of sound barrier walls within Pasadena are not identified in the report. At heights of four or eight feet, these walls could have an adverse visual impact on the visual character of the light rail corridor.

Approved:

Mark Nay, Vice Chair

City of Pasadena

DRAFT

LA-03498

100 NORTH GARFIELD AVENUE
P.O. BOX 7115, PASADENA, CA 91109-7215
Transportation Advisory Commission

PUBLIC WORKS AND TRANSPORTATION DEPARTMENT
(818) 405-4191

May 9, 1994

Mr. James L. Sowell
Manager
Environmental Compliance
Los Angeles County
Metropolitan Transportation Authority
P. O. Box 194
Los Angeles, CA 90053

RE: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT PASADENA-LOS ANGELES LIGHT RAIL TRANSIT PROJECT

Dear Mr. Sowell:

The City of Pasadena Transportation Advisory Commission has reviewed the Supplemental Environmental Impact Report for the Los Angeles-Pasadena Light Rail Project.

At the Commission's public meeting held on April 14, 1984 the following comments were adapted as part of the record of proceedings:

1. **Park and Ride Facility at Foothill Boulevard and Sierra Madre Villa:** The report was general in nature and did not disclose what type of facility was to be located at the site. The Commission had information that indicated a 1000 car surface lot was to be built at this site. The Commission feels this is not appropriate for the site and would be environmentally detrimental to the area. The expected garage on the southern section of the site, next to the freeway, would be reasonable and appropriate to the site.

2. **Builders Emporium Site:**
The former Builders Emporium site is no longer available as the site and building have been modified for a new tenant, Orchard Hardware Supply.

Sincerely,

ROBERT HUDDY
Chairman
Transportation Advisory Commission

LA-03498

CITY OF SOUTH PASADENA

1414 Mission Street • South Pasadena • California 91030
TEL (818) 799-9101 • FAX (818) 799-1109

262071 MAY-6 AM

KENNETH C. FARFSING
CITY MANAGER

James L. Sowell, Manager
Environmental Compliance
Los Angeles County
Metropolitan Transportation Authority
818 West Seventh Street, Suite 800
Los Angeles, California 90017

RE: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT - PASADENA - LOS ANGELES LIGHT RAIL TRANSIT PROJECT

Dear Mr. Sowell:

The City of South Pasadena has completed its review of the Draft SEIR for the Pasadena Blue Line. Our comments are based on review of the document and our letter of December 22, 1993, commenting on the Notice of Preparation. We are disappointed that the draft SEIR has ignored the concerns of the City of South Pasadena.

RCC and MTA staff met with the City of South Pasadena on March 12, 1994. We walked the entire alignment and discovered several project related impacts which are not discussed in this document or any of the previous environmental documents. The draft appears only to discuss changes in Pasadena, Highland Park and the Midway Yard.

NOISE WALLS - There were several noise walls which did not make any apparent sense. Sections of walls were adjacent to commercial and industrial property, where they are clearly not necessary. There were several houses immediately adjacent to the alignment with no sound walls. Arroyo Vista School requires focussed sound studies.

I am transmitting with this letter exhibits which indicate the correct locations of noise walls. Please include these exhibits in the SEIR as the required mitigation measure for the areas within the City of South Pasadena.

HORN NOISE - RCC and MTA staff met with the City of South Pasadena on April 25, 1994 to discuss the horn noise situation and wayside horn system. We were given a copy of an April 6, 1994 study of a wayside horn system. The draft SEIR should include this study. The SEIR should also state the current progress of the design of the electronic car horn.

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05. 07. 94 01:57PM *MAIL BOXES ETC. USA P02

The SEIR should include the following mitigation measures for horn noise:

1. The MTA/RCC will continue to develop the wayside horn system. Cities along the corridor will continue to be consulted on the development and implementation of the wayside horn system.

2. The RCC/MTA will use good faith efforts to seek approval of the wayside horn system from the Public Utilities Commission. RCC/MTA staff shall continue to work with PUC staff in the development and testing of the wayside horn system.

3. MTA/RCC will continue to develop and implement the electronic car horn. Cities along the corridor will be consulted on the car horn noise issue. MTA/RCC will work with the cities on the duration, pitch and other horn variables prior to the implementation of the car horns.

<u>TRACTION POWER STATIONS</u> - Neither this Draft SEIR nor previous documents discuss the potential historic resource losses due to the traction power station at 1111 Magnolia Street. The property has one of the original Rancho Santa Fe homes, which is currently proposed for demolition by the RCC.

The following mitigation measures should be incorporated into the draft SEIR:

1. RCC staff shall notify the City of South Pasadena six months prior to the proposed demolition of the residence located at 1111 Magnolia Street.

2. RCC staff shall permit the City of South Pasadena to relocate the home within the six-month period. RCC shall sell the residence at a nominal value to the City.

3. All heritage trees and significant trees shall be retained on the traction power station sites. These trees shall be integrated into the final landscape development plans for the site.

05. 07. 94 01:57PM *MAIL BOXES ETC. USA P03

Please include these comments and mitigation measures in the Draft SEIR. The City respectfully requests a copy of the Notice of Completion in order that we may exercise our rights under CEQA in a timely manner.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Kenneth C. Farfsing
City Manager

KCF:smh
att: Noise Wall Exhibits

cc: City Council
Blue Line Committee
Laurence Weldon
Jim Van Winkle
Horn Noise Working Group

Disk#A-Sowell.ltr

State of California

Business, Transportation and Housing Agency

LA-03498

Memorandum

L.A.C.M.T.A.

1994 MAY -2 AM 11:48

To : Mr. Mark Goss
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

Date: April 29, 1994

File No.:

IGR/CEQA/SEIR
LA County MTA
Pasadena-LA
Light Rail
Transit Project
Vic LA-110-VAR
LA-210-VAR

From : DEPARTMENT OF TRANSPORTATION
Wilford Melton - District 7

Subject: Project Review Comments

SCH No. 93121099

Caltrans has reviewed the above referenced document. It analyzes project modifications proposed since the adoption of the final project. Based on the information received, we have the following comments:

On Page 2-5, Table 2.2-1, Transportation and Circulation - the contra-flow lane proposed as a mitigation measure for access to the E/B I-210 from the Johnson & Johnson parking site will have significant traffic impacts on state facilities. Early coordination with Caltrans is recommended.

On Page 3-10, Section 3.3.7, the description should include the proposed contra-flow lane arrangement as a mitigation measure for traffic circulation impacts for access to the E/B I-210 from the Johnson & Johnson parking site.

On page 4-59, Section 4.7.2, for projected traffic volumes for the on and off-ramps at the Sierra Madre Villa intersection, Caltrans criteria needs to be considered if it gives larger volumes.

Thank you for this opportunity to comment. If you have any questions regarding this response, please call me at (213) 897-1338.

Original signed by

WILFORD MELTON
Senior Transportation Planner
IGR/CEQA Coordinator
Advance Planning Branch

✓ cc: Harley S. Martin
LACMTA
818 W. 7th. Street
Los angeles, CA 90017

ADDRESS ALL COMMUNICATIONS
TO THE COMMISSION
107 SOUTH BROADWAY, ROOM 5109
LOS ANGELES, CA 90012
TELEPHONE: (213) 897-

LA-03498

L.A.C.M.T.A.

1994 MAR 29 AM 10:37

Public Utilities Commission

STATE OF CALIFORNIA

FILE NO.

April 28, 1994

Mr. James L. Sowell
LACMTA
818 W. 7th Street, Suite 300
Los Angeles, CA 90017

Subject: CPUC Staff Comments on the Draft Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project

Dear Mr. Sowell:

The subject document has been reviewed by the Commission staff and we have no outstanding safety concerns at this time. We do note however on page 3-4, section 3.3.4.3 that reference is made to a switchyard operated by AT&SF. The Midway Yard is actually operated by SPTC.

Please feel free to directly contact Susan Feyl at 213-897-3546 if you have any questions concerning this matter.

Very truly yours,

Susan Feyl for

DONALD R. JOHNSON
Supervising Engineer
Rail Transit Safety Branch
Safety Division

JOHN CALDWELL DESIGN
Product and Graphic Design

COPY IN RMC

260551 LA-03498

L.A.C.M.T.A.

1994 APR 13 AM 10:44

TRANSMITTAL

Please deliver the following page(s) to:

Name: Mr. James S. Sowell, Manager

Company: Los Angeles County Metropolitan Transit Authority

From: John W. Caldwell

Date: April 12, 1994

Subject: The South Pasadena Light Rail parking

JCD

Message: Dear Mr. Sowell:

I'm the owner of the property and the business located at the address below, for the past 15 years.

My concern is parking. The last few years parking availability on El Centro has diminished; now, it is almost non-existent. Therefore, the Park and Ride locations that are being considered in the area are a must.

Limiting parking hours, to discourage Park and Ride from using up on-street parking, is being considered by the South Pasadena Planning Committee and Light Rail, thereby protecting retail, commercial and residential parking. This is imperative. I have suggested to Bill Campbell of the South Pasadena Planning Department and now to your office, that there be no parking between 6:00 A.M. and 9 A.M. Monday thru Friday in the area surrounding the Light Rail station. This would discourage Park and Ride all day parking. This would cause fewer inconveniences for businesses and residents than the proposed two hour parking limit in the area which is being considered.

In any event, I am a supporter of Light Rail and thank you for your consideration on this issue. If I can be of any service on any of your committees, I would be happy to do so.

Best Regards,

John W. Caldwell

901 El Centro Street
South Pasadena
California 91030-3115
Phone (213) 682-2809
Fax (818) 799-9615

LA-03498

KEVIN MICHAEL
STUDIO

L.A.C.M.T.A.
1994 APR 28 AM 10:53

April 26, 1994

Mr. Harley Martin
Metropolitan Transportation Authority
818 West 7th Street
Los Angeles, California 90017

Dear Harley:

Our business has just relocated to 3400 East Foothill in Pasadena, immediately next door to the Johnson & Johnson building proposed as a potential location for the final stop of the Pasadena Blue Line trolley.

Because I am extremely concerned as to the impact this will have on our business, I would appreciate any and all information pertinent to this destination, such as:

1. What will the site look like? A large parking lot and/or train station?

2. Where will passengers be going or coming from?

3. The asking price of that property is high. Why would the MTA need such a large and expensive piece of property anyway?

I would certainly appreciate your comments and concern. Please also advise us as to further information you may have as it develops.

Respectfully,

Kevin Sweeten

/kms

3400 East Foothill Boulevard
Pasadena, California 91107
818-585-8000

LA-03498

2630 Lacy Street
Los Angeles, CA 90031
(213) 222-8872
FAX (213) 222-1258

94 MAY 6 P4:05

LACY STREET PRODUCTION CENTER

DATE: May 4, 1994

TO: Harley Martin, Los Angeles County Metropolitan Transit Authority (MTA/RCC), Environmental Compliance

FROM: King Patrick Leonard, AICP ASLA
Lacy Street Production Studios

SUBJECT: Response to Draft Supplemental Environmental Impact Report, Pasadena - Los Angeles Light Rail Transit Project (Pasadena Blue Line), SCH # 93121099

In a continuing spirit of cooperation, and on behalf of the Lacy Street Production Center (studios) I offer the following comments regarding SCH #93121099 (SEIR).

The Lacy Street Production Center studios are located at 2630 Lacy Street in the Lincoln Heights neighborhood of Los Angeles. The studios are located directly across from the Los Angeles City Animal Shelter and parking facilities. Approximately 463 feet of the southerly portion of the facilities are adjacent to the proposed Pasadena Blue Line Project. The distance of buildings to the nearest rail line varies from 15-33 feet. Figure 1 shows the general location and layout of the studios with respect to the existing rail line and the proposed 26th Street Station.

As we have indicated in the past to your project staff, the studios are an important part of the Lincoln Heights community as well as the film industry in general. There are approximately 98,000 people employed in the film industry within the Los Angeles area. Over 10% of these people work at some time during the year within the Lacy Street Production Center. Several thousand additional people provide catering services, construction services and related services. In 1993 alone the studios were utilized by 130 production companies. Films, MTV productions, commercial films, and media presentations are prepared at the studios. The studio is the largest employment center in the East Los Angeles/Lincoln Heights area. The studio complex is unique in that there are only 17 film studios remaining in the Los Angeles metropolitan area, none of which have the unique architectural characteristics of the Lacy Street studios. Additionally, other studios in the region have been impacted severely by recent earthquake activity, however the Lacy Street Production Center has continued to operate 24 hours a day, 7 days a week to offset some of the demand that has been

placed upon the facilities as the result of the loss of other facilities for filming in the area. Consequently, our concerns are both unique and significant to the Pasadena Blue Line development process.

In the Initial Study for this SEIR, the Lacy Street facilities are generally described as being in the vicinity of Marmion Way. Previous environmental impact reports have incorrectly identified the studios as "Orion Pictures". Section 4 of this Draft SEIR identifies "Orion Pictures" and the facilities generally as "Railroad Industrial". We wish to point out that Orion Pictures was simply a lessee of the facilities at the time the Cagney & Lacey television series was being filmed, but the ownership was at that time, and continues to be, the present owners. Similar to The Alien Nation series filmed here by Fox Studios, the facilities were leased in large part by a single company. This was unusual for us to do this but both of these productions required most of the studio facilities in order to continually prepare features on a weekly basis. Figure 2 provides a general idea of how the facilities were being utilized at the end of 1993. Like most studios we continually change the stage areas and improve them each time they are used for different film productions. Because the California Environmental Quality Act (CEQA) review process for the Pasadena Blue Line has been going on since 1988, it is difficult for MTA/RCC staff and their consultants to keep up with the numerous changes that occur throughout the studios as well as the neighborhood.

Our comments are structured so as to:

1. Identify potential project impacts upon the studios and filming activities.

2. Describe the need for mitigation for specific and unique impacts that the Pasadena Blue Line Project will have upon the studios both during construction and in the operational stages.

3. Suggest mitigation measures to assure that uninterrupted filming can continue.

4. Suggest ways to incorporate mitigation measures into the required Mitigation Monitoring Plan.

5. Provide a summary of previous actions and comments by Lacy Street Production Center that have been provided to MTA/RCC staff regarding the Pasadena Blue Line Project. We noted that much of the significant work we have completed in acoustical analysis was not mentioned in this Draft SEIR, and this type of new information should be a part of the CEQA process.

MEMO - May 4, 1994

Our evaluation of this Draft SEIR was hampered by missing information, missing references and inconsistency between various CEQA documents prepared over an extended period of time. Unfortunately this kind of CEQA process, extended over such a long period of time, causes some confusion for the public, including ourselves, in evaluating the documents and precise impacts upon the studios. However, we have tried to focus on those areas that are most pertinent to the studios as opposed to some of our earlier comments which focused upon neighborhood concerns. We continue to believe that at the project level this kind of SEIR should be focusing upon the numerous public improvements required to support such a massive project as the Pasadena Blue Line. The SEIR appears to suffer from the implication that only the project is important and not the land uses and other public improvements needed to support the project. For these reasons we believe the scope of this document is inadequate to address many of the concerns we have previously indicated to you as well as the project level kinds of decisions that must be made in the near future if this project is to be developed in the time frame anticipated. We understand from the staff that the time frame has been moved forward for one year. We hope to be able to provide you with additional comments and suggestions in this extended time frame to deal with the more complex issues of the drainage, street right of way issues, pedestrian safety, visibility from vehicles, and architectural treatment around the 26th Street Station area.

We noted certain information missing from this document, such as the proposed electrical booster station which is now proposed to the east of our facilities. Originally we thought this facility would be to the south of our facilities and was sufficient distance from the studios so as not to be a significant impact. We believe that this general problem of the electrical booster stations and the noise levels emitted from such facilities has not been focused on in this SEIR at a time when property purchases are eminent. We note that the State Supreme Court has held that the notice requirements of CEQA, while sufficient to encourage general public participation in the environmental decision making process, are inadequate to meet due process standards for notice on the underlying project(s) where fundamental interests are substantially affected.

In some instances booster stations may require different zoning or a conditional use permit, depending upon the jurisdiction. We noted no analysis of jurisdictional requirements for these types of discretionary decisions and wondered if MTA/RCC were required to meet any such standards. At a minimum, the SEIR should address the design standards and noise/acoustical improvements that could be

provided to mitigate impact of these booster stations. We believe that putting a booster station adjacent to a film studio creates very significant impacts that should be mitigated and that should be reflected in a Mitigation Monitoring Plan.

In the general section on noise and vibration we noted that Section 4.4.2, again needs clarification as to "Orion Pictures" and "Railroad Industrial". At a minimum the studios should be called out as a designated film studio and the acoustical standards that we provided you through the Charles M. Salter report (and again noted in the Wilson Ihrig report prepared by your office) should be properly cited in the SEIR and included as appendices.

We noted comments by the City Administrator of Pasadena regarding horn noise and the SEIR tends to focus on some kind of decision hopefully to be rendered by the California Public Utilities Commission (CPUC). We would suggest that these kind of deliberations at the California Public Utilities Commission (CPUC) level are not a solution to the set of problems that require mitigation at the project level. It may be necessary for you to establish standards at the state level but mitigation of the problems should occur in the SEIR and be reflected in the Mitigation Monitoring Plan.

As for mitigation for the vibration impacts from the proposed transit system, we continue to believe that BMC or BMS construction should be included to the rear of the Lacy Street Production Center and shown in Table 4.4-10. We believe that the elimination of sound walls generally may not be good where trains are approaching the 26th Street Station on a curve. Additionally, a low wall along and adjacent to the tracks would eliminate much of the wheel noise that will probably occur in the future. We have raised this issue in some of our discussions with the staff in the past and have yet to receive an adequate response as to what alternative, if any, is proposed to the rear of the studios. Additionally, the track area has some drainage problems associated with it and since our buildings are directly abutting the railroad right of way we believe the drainage problem should be resolved prior to construction of the Pasadena Blue Line. There is a considerable amount of engineering work required in doing this. The construction drawings that we have examined to date do not propose any solutions to these problems to the rear of the studios. We would propose that mitigation of vibration and noise impacts be accomplished before construction is undertaken in 1995 so that filming can continue uninterrupted.

MEMO - May 4, 1994

Our preferred alternative, as recommended in the Salter report, is a barn/tunnel type enclosure of the transit line behind the studios, approximately 600 feet in length. However, we have suggested to your staff that a logical method of handling any on-site mitigation is a third party agreement similar to that used by the Bay Area Rapid Transit District. Through a third party agreement the studio can control any required design and retrofit work, if needed, in addition to the tunnel, and in conjunction with the complex scheduling problems of three or more film companies operating on the site at one time. Additionally, the studio can control the character of the work which is important to maintain the New York industrial look of the studios. It is because of the architectural character of the studios that they have been so successful in attracting so many film companies. PUC Section 180106(b) permits transmit authorities broad latitude in hiring and contracting. PUC Section 180154 governs bidding procedures and provides MTA/RCC with more than adequate legal protection for undertaking third party type agreements.

The SEIR provides some indication of site specific mitigation measures but these have not been offered to Lacy Production Studios in our discussions with staff. An example would be the replacement of windows and special treatment of older buildings. The SEIR does speak to the issue of "historic buildings" but does not recognize the studio as having historic character. We would suggest that the historic buildings are no different than many of the older buildings in China Town, along Lacy Street, or in the Pasadena area. When a transit system is developed in older areas of a city then special architectural treatment and acoustical treatments are required. This kind of work cannot be generically treated in a transit authorities Line Construction Standards Manual.

In Table 4.4-2 the footnote references to vibration measurement locations should be clarified. We're not certain that the public knows what the "WIA, 1993" report is about. Does this include the Wilson Ihrig Report completed for the studios? The text below refers to more restrictive criteria, however there is no mention of motion picture studios and the NC35 criterion in the Wilson Ihrig Report.

Under "off-site mitigation", page 4-41, no mention is made of older buildings such as the studios where sealing entire buildings to mitigate noise and vibration will result in need for additional air conditioning units.

MEMO - May 4, 1994

As a general comment we noted that there is no mention of the timing of mitigation measures or construction. A schedule should be part of the Mitigation Monitoring Plan.

Station construction and operation will require different considerations with respect to the studios. A portion of the "chop shop", indicated on Figure 2 as the garage set, abuts the 26th Street Station area. The need to mitigate noise levels on this side of the complex is critical and there needs to be considerable thought given to the architectural treatment along 26th Street as it relates to the station architecture (textures, colors, materials). The increased levels of noise from doors, horns, gongs, and parking lot activity should be considered in the SEIR and mitigated for an important facility such as a motion picture studio.

We have previously provided your staff with information regarding the Department of Water & Power (DWP) facilities being constructed to the south of our facilities. There appears to be no information in the SEIR regarding permits in the pipeline, types of permits, construction under way on other properties and the cumulative implications of transit to these land uses.

Other impacts to the Lacy Street Production Center will include reverberation of noise from the new DWP high rise building south of the studios, loss of outdoor filming areas, loss of light and ventilation, and the psychological impact on location managers due to passing trains. We are continuing to work with your staff on finding solutions to these problems as directed by your Board in August of 1993.

SUMMARY AND CONCLUSIONS:

A. Very significant, unavoidable, and cumulative impacts, particularly to the Lacy Street Production Center and the number of people employed in the center each year, should be recognized in this SEIR.

B. Project objectives should be expanded in the Initial Study to include recognition of the importance of land use changes and impacts upon specialized facilities such as motion picture studios and older structures.

C. There are two essential tests that an SEIR must pass. It must focus upon substantial new information of importance to a project and it must include information necessary to make the previous EIR adequate for the project as revised

(CEQA guidelines, Section 15163(b). This SEIR does not appear to meet either of these tests as we understand the CEQA process and based upon the information we have previously provided to your office and in this letter.

D. Some references and footnotes are unclear and misleading. These need to be cleaned up and additional information provided in this SEIR if the document is to meet the test of adequacy and completeness.

E. The need for recirculation of this SEIR appears to be necessary after revisions are made. We would like to have a copy of the recirculated document when it is available for public review.

F. We have continually asked for Public notices. In December we did not receive notice that an SEIR was being prepared. Through other sources we found that the document had been prepared but it was late in arriving, and consequently our time to prepare comments was reduced. We went to the public meeting held in Highland Park in which the documents were to be presented but they were not available.

The type of analysis required when an SEIR is prepared at the project level is necessarily more detailed and, in this case, requires higher levels of analysis. This can only be accomplished with adequate architectural and engineering studies running concurrently with work being undertaken by MTA/RCC.

In the spirit of cooperation we will continue to work with you to resolve the problems that we have identified in previous correspondence and in this letter.

MEMO - May 4, 1994

ATTACHMENTS:

1) Figure 1 - Lacy Street Production Center Map

2) Figure 2 - Lacy Street Production Center Facilities Layout

cc: James S. Knight, CEO, Lacy Street Production Center
Jack Freytag, PE, Charles M. Salter Associates
Paul Drag, AIA, Architect
Office of Councilman Hernandez
Alliance of Motion Pictures Producers and Directors
LACMTA/RCC Board and Staff
Rob Ball, Project Manager, LACMTA/RCC
Mayor Reardon's Office, Attn: Cody Cleff

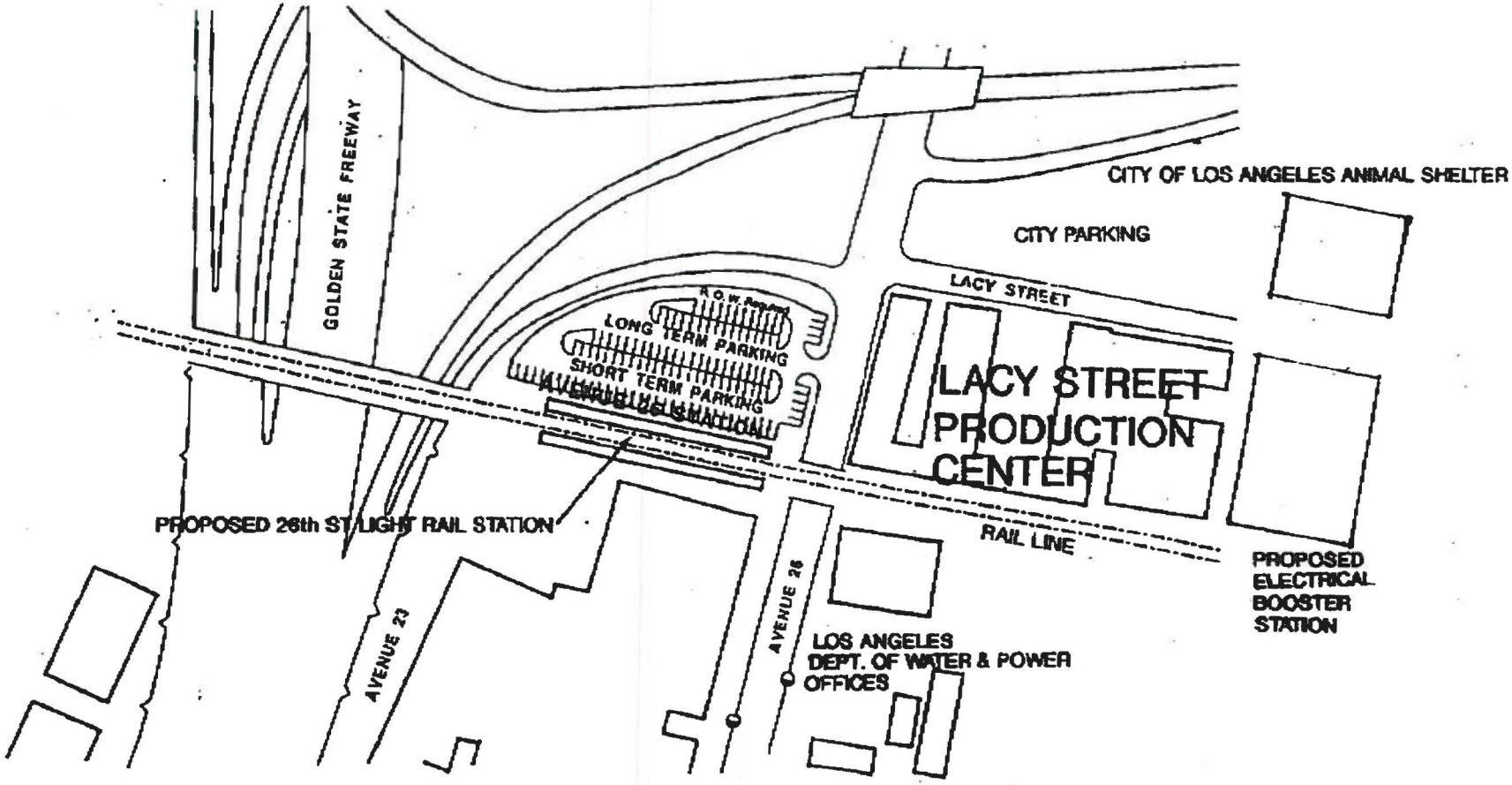
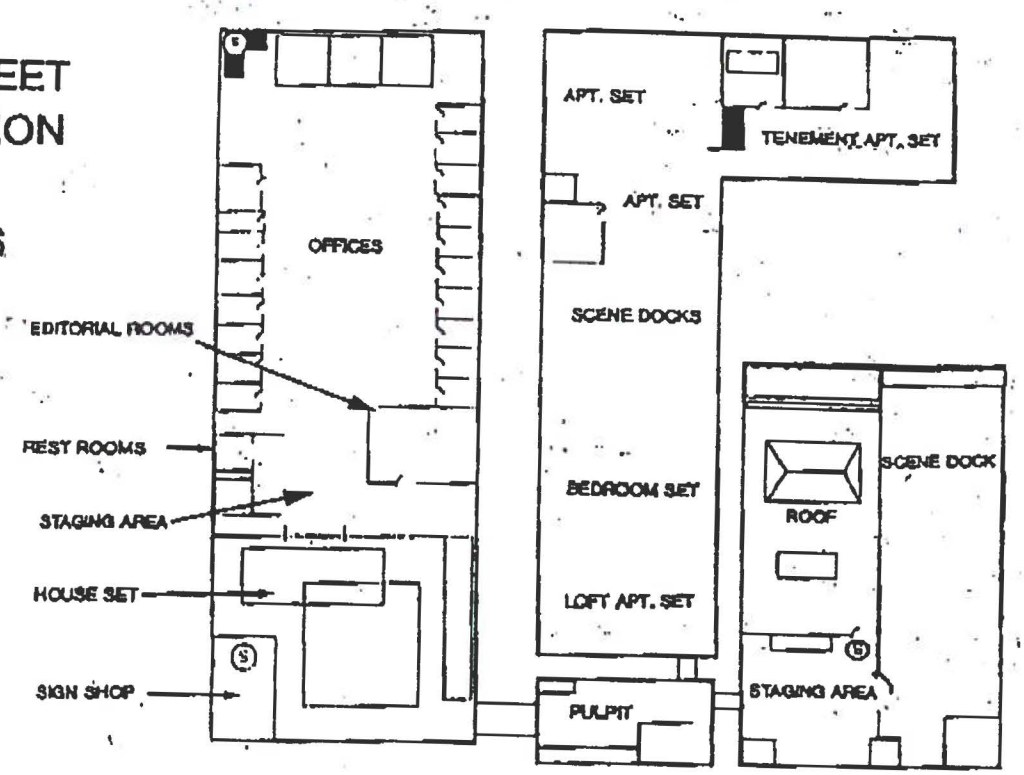


FIGURE 1
LACY STREET
PRODUCTION CENTER LOCATION

KING P. LEONARD, AICP/ASLA

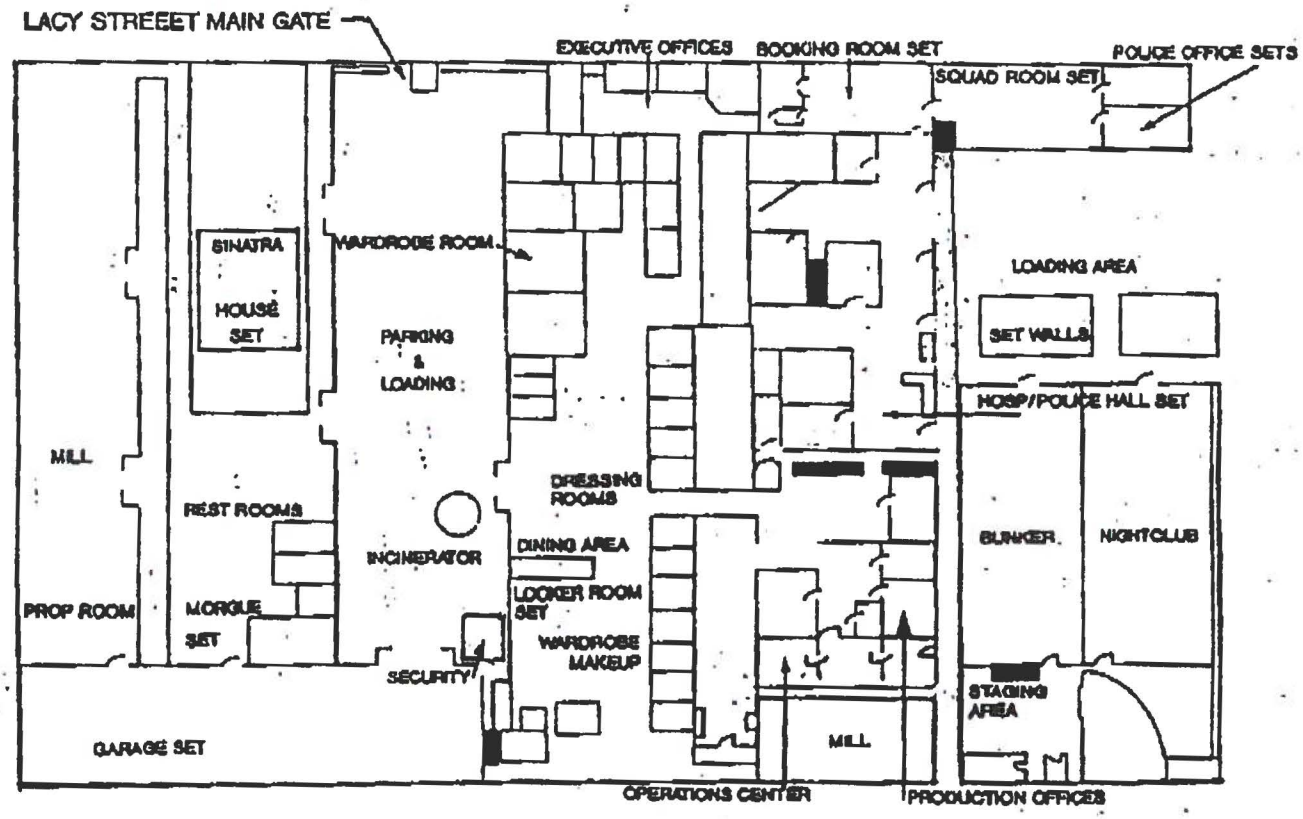
LA-03498

FIGURE 2
LACY STREET PRODUCTION CENTER FACILITIES



PROJECT NORTH

SECOND FLOOR



GROUND FLOOR

KING P. LEONARD, AICP/ASLA

COMMUNITY ECONOMIC DEVELOPMENT UNIT
LEGAL AID FOUNDATION OF LOS ANGELES LA-03498

May 9, 1994

LACMTA
818 West 7th Street
Suite 500
Los Angeles, California 90017

TRANSMITTED VIA FAX AND U.S. MAIL

Attn: Mr. Harley Martin,
Environmental Specialist

RE: Our Client: Tri-Communities Organization
Comments on Draft SEIR for
Pasadena-Los Angeles Light Rail Transit Project

Dear Mr. Harley:

Please be advised that our office represents the above-referenced client-organization, Tri-Communities Organization (Cypress Park-Elysian Valley-Glassell Park), an unincorporated association, and these written comments are herein submitted on their behalf.

Our comments are specifically referenced to the sections as identified in the Draft SEIR for the Pasadena-Los Angeles Light Rail Transit Project and as found in Section. 4: Environmental Impacts.

I. Section 4.2: Air Quality

4.2.3.1 Construction Air Quality Impacts: Demolition of Buildings. –

The Draft SEIR discloses the potential exposure of the community to asbestos, however it is deficient in that it fails to disclose the even greater potential of exposure of the community to lead during the proposed demolition of subsequently acquired residential structures, particularly along the Marmion Way Corridor in the Highland Park community and the greater potential of fugitive contaminated lead dust particles therefrom. The residential structures proposed to be acquired and subsequently demolished are significantly older structures and have a high probability of lead-based paint throughout them. As a result of this failure, the Draft SEIR is inadequate in its failure to analyze the extent of this potentially significant environmental impact to the air quality and human health of the impacted communities or to propose any mitigations thereof.

4.2.4 Impacts Mitigated to Insignificance by Existing Regulations. =

For the reasons stated above, the proposed mitigations are inadequate. The statement within the Draft SEIR that existing regulations render the environmental impacts insignificant is insulting and erroneous. The standard is reasonableness and regulations are generally construed as minimum standards to be applied. Reasonableness is to be determined as to the direct impact and application on the affected communities/residents/businesses.

Minimum standards for lead-based paint removal and encapsulation have been developed. However, the Draft SEIR is void of any information with regards to the various types of mitigation measures in relation to the removal of lead-based paint. Appropriately tailored analysis and application must be conducted based on the nature and demographics of the densely populated residential community of Highland Park. Reasonableness requires a specific mitigation monitoring implementation plan coordinated with the impacted communities which includes but is not limited to the following elements of: community-based and culturally sensitive involvement through contacts with impacted communities' schools, pre-schools, churches, parks and recreation centers, senior centers; notice and dissemination of information

8601 SOUTH BROADWAY • LOS ANGELES, CALIFORNIA 90003 • (213) 971-6039

to impacted communities in languages spoken, including but not limited to English, Spanish, Chinese, Vietnamese and Tagalog re: all findings relating to existence of lead and asbestos and/or any other hazardous materials; schedule of demolition; potential and projected impacts on adjacent residents (health, access impacts, street closures, haul routes); specific types of mitigation measures such as twice daily water spraying; washing down of equipment, streets, hours of construction, etc.; and joint development of a mitigation monitoring and implementation plan.

II. Section 4.4: Noise and Vibration

Section 4.4.5.1 Noise Mitigation –

Draft SEIR's discussion of proposed mitigation measures are inadequate in that it fails to address the potential of its proposed mitigations to create resultant and significant socio-economic environmental impacts in the form of community urban blight.

The proposed noise mitigations of lower sound barrier walls and acquisition of noise easements could potentially result in the creation of community urban blight along the Marmion Way Corridor of Highland Park. The Draft SEIR is deficient of any analysis with regards to the potential long term socio-economic impact of "prime target graffiti walls" along the entire length of the Marmion Way Corridor.

No proposed mitigation measures and/or monitoring implementation maintenance plan exists in the Draft SEIR re: ongoing maintenance and/or landscape buffering of the negative visual aspects of the proposed sound barrier walls. Recommendation is made to consult and include the Highland Park community's artist colony with regards to creative and collaborative maintenance mitigation measures.

The Draft SEIR is also deficient of any analysis of long term real estate devaluation of properties on which noise easements are acquired and on adjacent properties as a result of the existence of such easements on their neighbors' properties. The Draft SEIR proposes compensation of current property owners, which is a bare minimum standard, however no mitigation is proposed or explored with regards to the long term land devaluation to the Highland Park community and the potential to create a blighted corridor along the length of Marmion Way.

The Draft SEIR fails to analyze the most detrimental impact of its proposed noise mitigations in that they will create an entire corridor of residences along Marmion Way which are likely to become blighted in the near future. The value and desirability of the residences will further decrease as a result of the implementation of these proposed mitigation measures. Impacted property owners will be unmotivated to upkeep their properties, causing them to fall into disrepair. Thus, the proposed project has created an unmitigated significant environmental impact, i.e., urban blight.

In the FEIR prepared and certified by the County of Los Angeles for its proposed LAC-USC Medical Center Replacement Project (April 12, 1994), the County clearly acknowledged that its proposed project would have an adverse socio-economic impact on "strip" residences adjacent to but not included within its project site and the remaining community as a result of the isolation and physical location next to a 3000 car eight-story parking structure.

We recommend inclusion of analogous language in the Final SEIR with regards to LACMTA acknowledging the significant adverse impact on the remaining Marmion Way Corridor of Highland Park. As a separate but concurrent action with the certification of the Final SEIR and approval of the proposed project, we recommend that the LACMTA authorize a feasibility study be prepared to determine and assess the LACMTA's and the residents' joint options to prevent further adverse socio-economic impact to the Marmion Way Corridor of Highland Park such as blight, including but not limited to the exploration of acquisition and "park-like landscaped" open space re-use buffer zone and/or off-street parking for

adjacent residents only.

At the bare minimum, the Draft SEIR should conduct environmental analysis of the unmitigated blight that will be created by the implementation of the project's proposed noise mitigations. The proposed mitigation of such potential blight and its resultant socio-economic impact on the adjacent communities abutting the project must be identified.

III. 4.6 Housing

4.6.3.1 Total Parcel Acquisitions

The statement within the Draft SEIR that existing regulations render the environmental impacts insignificant is insulting and erroneous. The standard is reasonableness and regulations are generally construed as minimum standards to be applied. Reasonableness is to be determined as to the direct impact and application on the affected communities/residents/businesses.

The Draft SEIR fails to provide any analysis of the significant environmental impacts on the City of Los Angeles' Housing Element Component of the City's General Plan. As of 1989, the City of Los Angeles had identified a need of 27,270 lower income dwelling units and had produced only 13,951 such units or 51%. (Local Progress in Meeting the Low Income Housing Challenge, California Coalition for Rural Housing, 1989). Furthermore, as of 1991, the City of Los Angeles was found by the State not to be in compliance with its own Housing Element.

The Draft SEIR is further void of any analysis of the significant environmental impacts on the County of Los Angeles' Housing Element Component of the County's General Plan. As of 1989, the unincorporated portion of the County of Los Angeles had identified a need of 15,735 lower income dwelling units and had produced only 1,815 such units or a mere 12%. (Local Progress in Meeting the Low Income Housing Challenge, California Coalition for Rural Housing, 1989). The total Los Angeles County need for lower income dwelling units is 67,745 and as of 1989, only 22,425 (33%) such units have been produced throughout the county. (Local Progress in Meeting the Low Income Housing Challenge, California Coalition for Rural Housing, 1989).

Therefore, the proposed elimination of an unidentified number of units of affordable housing is clearly a significant environmental impact on a worsening city-wide and county-wide affordable housing need, which the Draft SEIR has not only failed to analyze, but also fails to mitigate. In addition, the Draft SEIR fails to analyze the cumulative impact on the loss of housing by the proposed additional acquisitions with its existing proposed taking of residences in conjunction with the French Street station and such projects as the County's proposed LAC-USC Medical Replacement Project which will result in the loss of 160 units and the displacement of 205 households.

The proposed Draft SEIR proposes no mitigation and thus fails to adequately address the need for replacement housing for the unidentified number of affordable housing units that will be destroyed, and the unidentified number of households that will be displaced.

When a public entity displaces residents as a result of any displacing activity (demolition, rehabilitation, eminent domain, etc.), the public entity is required to provide those displaced persons with relocation assistance to assure that within a reasonable period of time, the displaced person is able to relocate to a "comparable replacement dwelling." (Gov.Code Section 7261). "Comparable replacement dwelling" is defined as:

> . . . any dwelling that is all of the following:
> (1) Decent, safe, and sanitary.

(2) Adequate in size to accommodate the occupants.
(3) In the case of a displace person who is a renter, within the financial means of the displaced person. A comparable replacement dwelling is within the financial means of a displaced person if the monthly rental cost of the dwelling minus any replacement housing payment available to the person does not exceed 25 percent of the person's average monthly income.
(4) Comparable with respect to the number of rooms, habitable space, and type and quality of construction . . .
(5) In an area not subject to unreasonable adverse environmental conditions.
(6) In a location generally not less desirable than the location of the displaced persons dwelling with respect to public utilities, facilities, services, and the displaced person's place of employment. (Gov.Code Section 7260).

However, where no comparable replacement dwelling is available to a displaced person, and the public entity determines that a comparable replacement dwelling cannot otherwise be provided, the public entity is responsible for providing a comparable replacement dwelling through "any action necessary or appropriate to provide the dwellings by use of funds authorized for the project." (Gov.Code Section 7264.5; see also 42 USC Section 4626, "such action as is necessary or appropriate to provide such housing by use of funds authorized for such project").

The statutory directive in Government Code Section 7264.5 is supplemented by the California Administrative Code in that "no person shall be required to move from his dwelling'. . . unless comparable replacement housing is available," and a public entity "may not proceed with any phase of a project . . . or shall terminate or suspend further implementation of the project activities . . . unless it provides such housing." (Cal.Admin.Code, tit 25, Section 6054).

The Draft SEIR is void of any analysis of the volume and/or socio-economic make-up of the impacted households to be displaced by the proposed project. Thus no analysis exists as to whether or not "comparable replacement dwellings" are available. The Draft SEIR further fails to respond to this critical environmental impact with any proposed mitigation.

Both the Federal and State replacement housing laws require that where the public entity taking housing units cannot locate comparable replacement dwellings for the displaced households, the public entity is required to provide dwellings for those households by any action which is necessary. (Gov.Code Section 7264.5; Cal. Admin. Code, Tit 25, Section 605; 442 USC Section 4626; 49 Code of Federal Regulations, Section 24.404 (1992); McKenon v. Hastings College of Law 230 Cal.Rptr. 176, 186-87, 186 Cal.App.3d 896 (1986); Osburn v. Department of Transportation 270 Cal.Rptr. 761, 765, 221 Cal.App.3d 1347 (1990)).

The Federal Code of Regulations lists several means by which the public entity can provide comparable replacement housing: 1) rehabilitation of and/or additions to an existing replacement dwelling, 2) construction of a new replacement dwelling, 3) relocation and, if necessary, rehabilitation of a dwelling, and 4) purchase of land and/or a replacement dwelling by the displacing entity and subsequent sale or lease to, or exchange with a displaced household. (Code of Fed. Reg., Section 24.404[c][1]).

In such instances, precedence exists for the implementation of mitigation measures such as the creation of replacement housing trust funds to assist nonprofit developers to construct the actual replacement housing units of analogous type within the impacted communities abutting the proposed project. The Century Freeway Expansion Housing Trust Fund is an example of such mitigation measures.

Thus, the Final SEIR must include a plan for how the LACMTA will provide housing units for the

number of households for which there is no available comparable replacement dwelling. This replacement housing plan must be done immediately so that the replacement housing is available prior to the dislocation of any household. Without such replacement housing being made available, the LACMTA cannot proceed with any part of the proposed project. (Cal.Admin.Code, tit 25, Section 6054).

In the instances where replacement housing units are identified, the Final SEIR must state such replacement housing meets the criteria set forth in Government Code Section 7260[i] and 442 USC Section 4623[a][1][A] and 4624[2].

The Final SEIR is deficient of any analysis as to the availability of comparable replacement dwellings for the rental and homeowner households that will be displaced by the project.

* Draft SEIR is void of information indicating that the replacement dwellings are "decent, safe, and sanitary." (Gov.Code Section 7260[i][1]).

* Draft SEIR is void of information indicating that the replacement dwellings are comparable "with respect to the habitable space, and the type and quality of construction." (Gov. Code Section 7260[i][4]). A large majority of the displaced renter households will be displaced from dwellings which were single family residences.

* Draft SEIR is void of information indicating that the replacement dwellings are comparable with respect to location. (Gov.Code Section 7260[i][6]).

The Final SEIR must include a comprehensive evaluation of available replacement housing. Without more specific information, the facts upon which the LACMTA is relying to document the availability of replacement housing is deficient under the law. (Keith v. Volpe).

On behalf of our clients, we strongly propose adoption and inclusion of language regarding the mitigation measures provided in the FEIR prepared and certified by the County of Los Angeles for its proposed LAC-USC Medical Center Replacement Project (April 12, 1994) [See pages 209-211 of FEIR and relevant responses to DEIR comments, State Clearing House No. 92101010]. The issues and concerns raised by the community in conjunction with that project are the same as those raised by our clients in connection with the LACMTA's proposed project. Thus the LACMTA should follow the lead of the County and adopt similarly and appropriately tailored mitigation measures to address community and impacted residents' concerns regarding displacee issues; relocation assistance issues; and one for one replacement housing needs issues as it relates to affordability, type (single family/homeownership) and physical location within the impacted communities.

In adopting its proposed mitigation measures, the County acted in good faith to reflect the intent of the applicable laws governing relocation of displaced residents, i.e., to implement the legislature's attempt to render the adversely impacted displaced residents "whole" again to as great an extent as is feasibly possible. To this end, the Final SEIR should include similar language which acknowledges the cumulative adverse environmental impact on the affordable housing needs of the Northeast communities through its displacement of households in the Highland Park community. The LACMTA should further acknowledge the severe hardship its project will have on these displaced residents, and therefore should include language within the Final SEIR of the intent of the LACMTA to adopt an adequate mitigation measure in the form of a Relocation Assistance Program Plan for the proposed project, which will be customized, applied and implemented in a sensitive manner to render the residents as "whole as is feasibly possible" according to their individual needs and situations.

4.6.3.2 Partial Parcel Acquisitions

The Draft SEIR fails to analyze the cumulative impacts of its failure to mitigate the detrimental impact of creating an entire corridor of residences along Marmion Way which are likely to become blighted

in the near future. The value and desirability of the residences will decrease further as a result of the implementation of these proposed mitigation measures. Impacted property owners will be unmotivated to upkeep their properties, causing them to fall into disrepair. Thus, the proposed project has created an unmitigated significant environmental impact, i.e., urban blight.

The Draft SEIR is also deficient of any analysis of long term real estate devaluation of properties on which partial acquisition will occur and on adjacent properties as a result of the existence of the reduction of front or back yard areas, reduced vehicle access, and/or loss of parking. The Draft SEIR proposes compensation of current property owners, which is a bare minimum standard, however no mitigation is proposed or explored with regards to the long term land devaluation to the Highland Park community and the potential to create a blighted corridor along the length of Marmion Way.

As stated in Section II above, we make reference to the FEIR prepared and certified by the County of Los Angeles for its proposed LAC-USC Medical Center Replacement Project (April 12, 1994), and propose the same recommendation as stated therein above.

IV. 4.7 Transportation and Circulation

The Draft SEIR fails to address the cumulative impact that the proposed five additional street closures and the partial parcel acquisitions will have on the on-street parking in the area. The impacted Highland Park community consists of older residential structures with limited to no off-street parking, and the loss of existing off-street parking will further exasperate this parking need. Thus, the Draft SEIR is deficient for its failure to provide or otherwise propose any mitigation measures for this negative environmental parking impact.

V. 4.9 Human Health

All of the concerns and comments stated above in Section I are incorporated by reference herein. Especially as they relate to the failure to address potential lead exposure during the construction/demolition of buildings phases.

VI. Cumulative Impacts

Concerns and comments regarding the cumulative impacts of the proposed project are stated above in Sections III and IV are incorporated herein by reference.

VII. Conclusion

For all the reasons stated above, the Draft SEIR is deficient in that it fails to adequately inform the public as to the extent and magnitude of the proposed project's negative environmental impacts and the reasonableness of the Draft SEIR's proposed mitigation measures. The public is thereby denied its mandated opportunity to adequately comment thereon.

Respectfully submitted,

Legal Aid Foundation of Los Angeles,
Community Economic Development Unit

By Sharon M.Y. Lowe, Attorney at Law

cc: Tri-Communities Organization
Cypress Park-Elysian Valley-Glassell Park

LA-03498

T.A. NELSON, P.E.

CONSULTING ENGINEER
TRANSPORTATION CONSULTANT
2563 Dearborn Dr., Los Angeles, CA 90068 (213) 462-5500

May 2, 1994

James L. Sowell
Mgr., Environmental Compliance
L. A. County Metro. Transp. Authority
818 W. 7th Street, Suite 300
Los Angeles, CA 90017

Dear Mr. Sowell:

This letter is in reference to the second Draft Supplemental EIR, Pasadena-L.A. LRT Project dated March 25, 1994. The DSEIR does a credible job of covering the issues in the five areas studied. I have a few comments as follows.

Page 4-35 — Sound levels along Marmion Way may not be intrusive to residents. A sound that is expected and occurs regularly, if not overly excessive, is often ignored. This has been my experience, having lived and attended school next to streets carrying electric interurban lines. Walls tend to divide communities; landscaping may be substituted. The lower sound level emitted by the new L.A. Standard LRVs may be acceptable without external mitigating measures.

Page 4-58, 4.7.1.3 -- A drawing of the Marmion Way/Figueroa St. below-grade separation should be included with the Final SEIR.

Page 4-63, 4.7.3.3 — Due to the nature of excavations, a below-grade separation at Figueroa/Marmion will have greater construction impacts than an aerial structure. Figueroa will probably be narrowed or detoured during construction. Based on preliminary drawings, it appears that residents southwest of French Ave. will lose direct access to Pasadena Ave. via French and will be required to use Ave. 37. This negative impact may be considered mitigated by the improved access to an LRT station at French Ave. compared to the previously planned station location at Figueroa St. The realignment of Pasadena Ave. with Marmion Way at Figueroa does improve the street system.

Page 4-82, 4.8.3.3 -- Criminal activity in the below-grade separation at Figueroa may be limited by strategically placed fencing and lighting. Monitoring may be possible from closed-circuit video cameras mounted either side of Ave. 37 and Figueroa, if they can be made theft proof. In referring to utilities relocation, the most important entity was omitted, the Dept. of Water and Power. The Gas Co., Pac Tel, and TV cable company may be involved, also.

Sincerely,

T. A. Nelson

LA-03498



RE: Draft Supplemental Environmental Impact Report--Pasadena-Los Angeles Light Rail Transit Project (DSEIR)
SCH# 93121099

Citizens Committee to Save Elysian Park

1501 Cerro Gordo
Los Angeles, CA 90026
(213) 666-9651, 222-8050

May 6, 1994

James L. Sowell
Manager, Environmental Compliance
L.A.County MTA
818 West 7th Street, Suite 300
Los Angeles, CA 90017

Dear Mr. Sowell:

The Citizens Committee to Save Elysian Park (CCSEP) would like to challenge the DSEIR on several counts regarding the Midway Yard.

To begin, in the original EIR document the Midway Yard was listed along with Taylor Yard and the Cornfield-Bullring Yard as a potential site for a maintenance facility, but in a subsequent paragraph was dismissed as being too small. Now MTA has decided to use the yard that is not only too small but also requires a secondary fire road that will cost $millions to build. Add to that that this fire road will both take park land with no compensation offered and permanently scar an Elysian Park hillside--all for a temporary facility.

The proposed retaining walls for this road are not 0-36' as indicated on Figure 3.3-6. Current plans call for walls on both the upper and lower banks of the road totalling up to 50' in height for as long as 280'. Furthermore, the road as planned would destroy a hilly nob in Elysian Park replete with mature trees. To state theat "No impacts...will be significant. Therefore mitigation measures are not required."(4.7.5.4) is ludicrous.

Firstly, taking of park land is illegal per City Charter unless the taking agency bequeaths equal or greater acreage in the area as replacement park land. Secondly, there must be additional landscape mitigation for such an expanse of retaining wall, and the mature trees lost must be replaced with an equal or greater amount of mature trees.

It would be a much better solution to realign the road down the natural draw which is what the Department of Water and Power (DWP) pump station road follows. When DWP completes construction of its new chlorination station, it will have no need for the old pump station building, and MTA could continue the road down into the yard through that site. This scenario would both save the hill and trees from destruction, as well as eliminate huge and unsightly retaining walls. Assuredly, it would also cost a fraction of the currently proposed overly engineered road.

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[redacted]

Comments to MTA
RE: Draft Supplemental Environmental Impact Report--
Pasadena-Los Angeles Light Rail Transit Project (DSEIR)
SCH# 93121099

Lastly, CCSEP fully expects MTA to commit to constructing a bike path from Taylor Yard into Elysian Park as mitigation. Before recent work involving new tracks and bridges for both the maintenance facility and Metrolink, uninterrupted access in the form of a crude path existed along the Los Angeles River from Barclay Street(where the current approved bike path ends) to Elysian Park via the Midway Yard. Because of rugged topography, the Buena Vista area of the park above Midway Yard is the only logical point to connect Elysian Park to the river bikeway which it is hoped will eventually extend to Long Beach. As a transportation agency, MTA has a responsibility to preserve this access.

Sincerely,

Sallie W. Neubauer

Sallie W. Neubauer
President, CCSEP

05. 07. 94 01:57PM *MAIL BOXES ETC. USA P06

LA-03498

Neighborhood Information Network

P.O.Box 70757, Pasadena, Ca. 91117 *Phone & Fax: (818) 351-1203*

261129 APR 22

21 April, 1994

LACMTA
818 W. 7th Street
Suite 500
Los Angeles, Ca. 90017

Attn: Mr. Harley Martin, Environmental Specialist

Re: Pasadena-Los Angeles LRT Project SEIR

Dear Mr. Martin,
This letter will confirm my verbal testimony at your public hearing the evening of 20 April at the Hastings Ranch Library in the city of Pasadena.

First I would like to congratulate the MTA on finally addressing the concerns we voiced in late 1991 and early 1992 about potential problems with air quality and traffic at the Sierra Madre terminus. Unfortunately, your additional studies confirmed that which we had feared the most. Traffic grid lock will most likely occur and the CO concentrations will be dangerously high once the project is completed and in service.

TRAFFIC

The following comments apply to your analysis of traffic impact on the Northern site, the Johnson & Johnson property.

Sierra Madre Villa and Foothill - LOS calculations for 2010(total) show a level of 1.105. After mitigation a level of 0.942.

Halsted and Foothill - LOS calculations for 2010(total) show a level of 1.012. After mitigation a level of 0.801.

Rosemead and Foothill - LOS calculations for 2010(total) show a level of 1.099. After mitigation a level of 1.005.

Rosemead and Colorado Blvd. - LOS calculations for 2010(total) show a level of 1.037. I did not find mitigation measures for this intersection as related to the Northern site. However, the proposed mitigation measures for the Southern site of the same intersection showed a level of 0.959.

The LOS definitions provided in the SEIR state that level E, with a range of .91 to 1.0, will provide "*Unstable flows. Represents the capacity of the intersection. There may be long queues of vehicles waiting through several signal cycles*". **As you know, the definition of Level F is even worse!**

We do not agree with your conclusion (Table 2.2-1 on page 2-5) that the Transportation and Circulation problems are "*Not significant*". We believe they are *quite significant!*.

Bottom line is that we request you consider further mitigation measures to reduce the LOS impact on the two LOS level E and one level F (after mitigation) intersections. Consideration might be given to the following: The elimination of pedestrian cross traffic at these intersections by providing either overhead or underground pedestrian crossings. Provision of overhead or underground auto passes for through traffic. Utilization of counterflow traffic lanes depending on the time of day and traffic direction. A portion of Foothill Blvd. has an unused median that could be placed in service as well as Rosemead Blvd. south of Colorado.

AIR QUALITY

We are concerned that the anticipated level of CO emissions at peak ambient 8-hour average concentrations at the Sierra Madre Station Park and Ride facility are approaching the danger level. The stated figures (page 4-20) of 8.8 ppm is really too close to California Standards 8-hour level of 9.0 ppm. A slight error in calculation of the amount of anticipated traffic could easily create a situation where the 9.0 ppm level would be exceeded. How do you mitigate this potential problem?

STATION CONFIGURATION

The following comment refers specifically to the Northern Station site. Your description of the proposed station on page 4-19 does not agree with a proposed parking site plan (attached) that I obtained this week from the city of Pasadena which was not a part of this SEIR. Further, the parking site plan included property at the corner of Halsted and Foothill that is not a part of the Johnson and Johnson facility. Elimination of this property would reduce the proposed configuration by approximately 100 std. parking spaces. Consideration should be given to reconfiguration of the site to accommodate 1000 vehicles.

Thank you for the opportunity to make these comments about the SEIR. We trust you will respond favorably and assist us in building a light rail transit facility that will *benefit* East Pasadena and *not seriously impact* our community.

Sincerely,

Cliff Benedict, Chair

cc: Cynthia Kurtz, Director
Public Works, City of Pasadena

LA-03498

Pasadena Heritage

May 7, 1994

Mr. Harley Martin
Los Angeles County Metropolitan Transportation Authority
Rail Construction
818 W. 7th Street
Los Angeles, California 90017

RE: Draft Supplemental Environmental Impact Report
LACMTA/RCC Pasadena-Los Angeles Light Rail Transit Project

Dear Mr. Martin:

On behalf of the Board of Directors of Pasadena Heritage, thank you for this opportunity to comment on the DSEIR for the LACMTA/RCC Pasadena-Los Angeles Light Rail Transit Project.

Our primary concern is the Johnson & Johnson/Merck site located on E. Foothill Boulevard in Pasadena, one of two sites under study as a potential park and ride location. Our comments are as follows:

Table 2.2-1
The Johnson & Johnson/Merck facility has been determined by the City of Pasadena Cultural Heritage Commission to meet the criteria for an "Historic Treasure," the highest landmark designation in the City of Pasadena. Two landmark nominations (City and National Register of Historic Places) are pending, as stated in the document.

The loss of this building is recongized in the docement as a significant negative impact with mitigation required. Documentation of the building is not acceptable mitigation under CEQA.

Section 2.4
The demolition of the Johnson & Johnson/Merck building is a controversial issue and needs to be resolved.

Section 4.10.1
The descritpion of the site and its significance is adequate. Please note that on page 4-90, second line, Pasadena Heritage is the complete name of the organization (a private non-profit organization). The word "commission" should be deleted.

Section 4.10.3
The statement is made that "If the Johnson and Johnson/Merck stie is selected ... all of the buildings and structures would be subject to demolition. Demolition of any structure at the site nominated for listing in the National Register of Historic Places

80 West Dayton Street
Pasadena, California 91105
Telephone 818 · 793 0617

LA-03498

would result in a significant adverse impact to a cultural resource." The DSEIR recognizes that the building should be treated as eligible for the National Register.

Alternatives to demolition which would mitigate this significant adverse impact should be presented as part of this document. (While recordation may be part of the process, it is not mitigation and does not reduce the negative impact to zero.)

Alternatives should include, but not be limited to:

Developing a reuse alternative for the historic building which could meet needs of the agency and using the rest of the site as the Park and Ride facility.

Using that portion of the site which is vacant or currently has nonsignificant buildings for the Park and Ride facility and leasing the building.

Entering into a joint development agreement with another agency or private party to reuse the building and construct the parking jointly.

Seeking a subdivision of the property and purchasing the southern portion of the property only.

What changes in circulation plans would be indicated if the building were preserved or reused? What would the relative costs and savings be for each alternative?

With regard to the 106 process, how is the treatment of historic properties addressed in the Memorandum of Agreement, Programatic Agreement or Memoradum of Understanding signed by the MTA, ACHP and FHA and the SHPO?

If there are interested parties concerned with the preservation of the cultural resource, must not consideration be given to the preservation of the significant structure?

In closing, please let us reiterate that a thorough exploration of alternatives for the Johnson and Johnson/Merck building must be included in the Final EIR so that these can be considered as part of the decision-making process.

Sincerely

Susan N. Mossman
Executive Director

/snm

M.T.A./ R.C.C. COPY RM TEL:213-244-6001 Apr 26 94 15:39 No.010 P.02

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April 21, 1994

Metropolitan Transportation Authority
C/O Harley Martin
818 W. 7th St.,
Los Angeles, CA 90017

Please do not consider the new Orchard Hardware Supply property located at 3425 E. Colorado Blvd. in EAst Pasadena for the proposed light rail trolley stop. We citizens need the store, and the city needs the tax income.

Why were they permitted to spend large sums preparing the site for the new store if this was in your plans?
Johnson/Merck on E. Foothill has been vacant for a long time and KOdak Datatape is also available.

George W. Sabin
711 Lomora AV.,
Pasadena, CA 91107

3.2 TRANSCRIPTS OF PUBLIC MEETINGS

The transcripts of the public meetings held at the Franklin High School Auditorium in Highland Park on April 13, 1994, and the Pasadena Hastings Branch Library in Pasadena on April 20, 1994, are presented on the following pages.

LOS ANGELES COUNTY

METROPOLITAN

TRANSPORTATION AUTHORITY

PUBLIC HEARING

BENJAMIN FRANKLIN HIGH SCHOOL
820 NORTH AVENUE 54
HIGHLAND PARK, CALIFORNIA

WEDNESDAY, APRIL 13, 1994

COMMENCING AT 7:10 P.M.

REPORTED BY: MARK SCHWEITZER

HIGHLAND PARK, CALIFORNIA; WEDNESDAY, APRIL 13, 1994

7:10 P.M.

-000-

MR. LANTZ: GOOD EVENING, LADIES AND GENTLEMEN. THANK YOU FOR COMING OUT TONIGHT. TONIGHT WE HAVE AN INTERPRETATION TRANSLATION SERVICE AVAILABLE FOR THOSE THAT DO NOT SPEAK ENGLISH OR WOULD RATHER LISTEN OR SPEAK IN SPANISH. AND AT THIS TIME I'D LIKE TO INTRODUCE THE TRANSLATOR, MARIA GALYAN, WHO CAN GIVE YOU THE INFORMATION IN SPANISH ON THAT.

(INTRODUCTION IN SPANISH BY INTERPRETER)

MR. LANTZ: MY NAME IS STEVE LANTZ. I'M THE DIRECTOR OF THE SAN GABRIEL VALLEY TEAM FOR THE L.A. COUNTY METROPOLITAN TRANSPORTATION AUTHORITY. IT'S A LONG TITLE. I'M HAPPY TO BE HERE AS YOUR OFFICIAL HEARING OFFICER TONIGHT.

THIS PROCESS IS A LITTLE DIFFERENT THAN A COMMUNITY MEETING IN THAT THIS PORTION OF TONIGHT'S MEETING IS A FORMAL PUBLIC HEARING IN WHICH ANYBODY WHO WISHES TO SPEAK MAY DO SO AT THE MICROPHONE FOR THREE MINUTES AND IN WHICH THERE WON'T BE ANY FEEDBACK GIVEN TO YOU DURING THE PUBLIC HEARING. FOLLOWING THE FORMAL PUBLIC HEARING, ONCE

EACH PERSON HAS GIVEN THE TESTIMONY THAT THEY WOULD LIKE TO DURING THAT THREE MINUTES, THEN WE WILL HAVE STAFF AVAILABLE TO ANSWER QUESTIONS AND TO TURN THIS INTO MORE LIKE AN OPEN HOUSE. BUT IT IS IMPORTANT THAT WE SEPARATE THE TWO FUNCTIONS, THE ONE FUNCTION OF RECEIVING THE FORMAL TESTIMONY, AND THE SEPARATE FUNCTION OF TALKING WITH YOU INFORMALLY ABOUT YOUR FEELINGS ABOUT THE PROJECT.

I HAVE SOME FORMAL RESPONSIBILITIES. ONE OF THOSE IS TO READ THIS THREE-PAGE SCRIPT. SO IF YOU'LL BEAR WITH WE, I'LL TRY TO MAKE IT AS LIGHT AT POSSIBLE, BUT WE NEED TO USE THE SAME WORDS AT EACH OF THE PUBLIC HEARINGS. I WILL BE MODERATING TONIGHT'S PUBLIC HEARING AND ENSURING THAT YOUR COMMENTS ARE ENTERED INTO THE ADMINISTRATIVE RECORD. I WOULD LIKE TO INTRODUCE OTHER TEAM MEMBERS WHO ARE PRESENT TONIGHT. THEY ARE ROB BALL WITH THE RCC, WHO IS A DEPUTY PROJECT MANAGER. ROB?

NO APPLAUSE IS NECESSARY.

SECONDLY, FROM THE RCC ENVIRONMENTAL UNIT WE HAVE JIM SAUL AND HARLEY MARTIN, BOTH OF THEM WITH THE ENVIRONMENTAL COMPLIANCE SECTION RESPONSIBILITY.

THIRDLY, THE AUTHOR, THE PROJECT MANAGER, THE CONSULTANT FROM TETRA TECH, LOU MC MAYOR. THERE HE IS IN THE BACK.

C.C. MELINSON FROM OUR REAL ESTATE DEPARTMENT, AND MARTA MAESTAS FROM PUBLIC AFFAIRS. THERE SHE IS IN THE BACK

OF THE ROOM. AND ART CUETO, WHO IS THE PLANNING PROJECT MANAGER FROM MTA AS WELL.

ON BEHALF OF THE TEAM MEMBERS, I WELCOME YOU TO TONIGHT'S PUBLIC HEARING AGAIN. THIS IS THE FIRST OF TWO PUBLIC HEARINGS THAT HAVE BEEN SCHEDULED FOR THIS PROJECT. THE FOCUS OF THIS PUBLIC HEARING WILL BE TO TOUCH ON THE ENVIRONMENTAL ISSUES ADDRESSED IN THE SECOND SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT, ESPECIALLY THOSE DIRECTLY AFFECTING THE LOCAL COMMUNITY. WE WILL FORMALLY RESPOND IN WRITING TO ALL COMMENTS RECEIVED TONIGHT. IN ADDITION, WRITTEN COMMENTS WILL BE ACCEPTED BY THE MTA UNTIL MAY 9, 1994, WHICH IS THE CLOSE OF THE PUBLIC REVIEW PERIOD FOR THE SECOND SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT. THIS REPORT WILL ALSO BE SUBJECT TO AN INDEPENDENT REVIEW BY OUR METROPOLITAN TRANSPORTATION AUTHORITY BOARD.

BEFORE WE BEGIN, I'D LIKE TO DISCUSS THE PROCEDURES WE WILL BE FOLLOWING THIS EVENING. IF YOU WOULD LIKE TO SPEAK, PLEASE FILL OUT ONE OF THESE BLUE SPEAKER REQUEST CARDS.

MARTA? MARTA'S HERE. MARTA WILL BE AT THE BACK OF THE ROOM AND CAN ACCEPT THESE CARDS ANY TIME DURING THE PUBLIC HEARING. IF YOU'LL TURN THEM IN TO HER, SHE CAN BRING THEM ON DOWN, AND WE CAN HEAR YOUR COMMENTS BEFORE THE PUBLIC HEARING IS CLOSED.

WE HAVE A COURT REPORTER PRESENT. SO PLEASE STATE

YOUR NAME AND ADDRESS AND HELP ME BY SPELLING YOUR NAME, IF YOU WOULD, SO THAT WE GET IT ACCURATE ON THE RECORD.

YOU HAVE A MAXIMUM OF THREE MINUTES TO SPEAK, TO MAKE YOUR COMMENTS. ART CUETO IS KEEPER OF THE STOPWATCH. HE IS A HANDY DANDY LITTLE ELECTRONIC BEEPER THAT I ASKED HIM TO TURN ON. WE'LL TRY NOT TO BE RUDE. BUT WHEN THE BEEPER GOES OFF, I WILL ASK YOU TO CONCLUDE YOUR COMMENTS SO THAT WE CAN HEAR FROM OTHERS AS WELL.

THE PUBLIC HEARING IS BEING HELD TO ENCOURAGE PUBLIC PARTICIPATION DURING THE VARIOUS PHASES OF THE PROJECT'S PLANNING. ALTHOUGH NOT REQUIRED BY THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, PUBLIC HEARINGS SUCH AS THESE ALLOW FOR AND FACILITATE A PARTICIPATORY PROCESS, A PLANNING PROCESS THAT ENCOURAGES INTERACTION WITH THE COMMUNITY AND RESPONSIVENESS TO THE COMMUNITY AND YOUR INTERESTS BY THE LEAD AGENCY ON IN PROJECT WHICH IS MTA.

IN THE SPRING OF 1990, THE L.A. COUNTY TRANSPORTATION COMMISSION, A PREDECESSOR OF MTA, CERTIFIED THE ORIGINAL ENVIRONMENTAL IMPACT REPORT FOR THE PASADENA-LOS ANGELES LIGHT RAIL TRANSIT PROJECT. SINCE THAT TIME, MODIFICATIONS TO THE ORIGINAL PROJECT HAVE BEEN MADE, PLANNED, WHICH REQUIRE THE PREPARATION OF THE FIRST SUPPLEMENTAL EIR WHICH WE PREPARED IN 1992. FURTHER MODIFICATIONS AS WE'VE GONE FURTHER INTO DESIGN AND REFINEMENTS NOW REQUIRE PREPARATION OF THIS SECOND

SUPPLEMENTAL EIR. THE SUPPLEMENTAL EIR IS PREPARED WHEN INFORMATION OF SUBSTANTIAL IMPORTANCE TO THE PROJECT BECOMES AVAILABLE WHICH WAS NOT KNOWN IN THE PRIOR PLANNING PROCESSES.

THE INTENT OF THESE SUPPLEMENTAL EIR IS TO ADDRESS ONLY THE NEW INFORMATION AND THE INFORMATION NECESSARY TO MAKE THE PREVIOUSLY CERTIFIED DOCUMENTS, THE EIR, THE FIRST SUPPLEMENTAL EIR ADEQUATE FOR THE PROJECT AS IT NOW EXITS. THIS SUPPLEMENT AT EIR WAS PREPARED SO THAT NEW INFORMATION AND DESIGN ALTERNATIVES COULD BE ANALYZED AND REVIEWED.

THE PROPOSED PROJECT CONSISTS OF SEVEN PRIMARY AREAS OF MODIFICATION TO THE ADOPTED LIGHT RAIL PROJECT WHICH REQUIRE ANALYSIS IN THIS SUPPLEMENTAL EIR. THEY INCLUDE:

THE ACQUISITION OF SIX ADDITIONAL PLOTS AND UP TO 50 MINOR CURB CUTS ALONG MARMION WAY BETWEEN AVENUES 50 AND 60 TO PROVIDE IMPROVED ACCESS FOR EMERGENCY VEHICLES ALONG THIS IMPORTANCE OF THE ALIGNMENT.

CHANGING OPERATIONAL MODES OF THE TRAINS FROM STREET RUNNING TO SEMI-EXCLUSIVE RIGHT OF WAY, BETWEEN AVENUE 51 AND 61, WITH THE RESULTING MODIFICATIONS TO THE GATED CROSSINGS, WARNING SIGNALS, AND CLOSURE OF AT-GRADE STREET CROSSINGS AT AVENUES 51, 53, 55, 58, AND 61.

A REEVALUATION OF THE SOUNDWALL MITIGATION MEASURES.

AN EVALUATION OF ALTERNATIVE LOCATIONS TO THE PREVIOUSLY CLEARED SPACE BANK FACILITY FOR THE SIERRA MADRE VILLA STATION'S PARK-AND-RIDE FACILITY. ALTERNATIVE SITES INCLUDE THE JOHNSON AND JOHNSON/MERCK, OR BUILDER'S EMPORIUM PROPERTIES.

AND FINALLY, AN EVALUATION OF A BELOW-GRADE SEPARATION OF THE INTERSECTION OF OF MARMION WAY AND FIGUEROA STREET.

THE SUPPLEMENTAL EIR ADDRESSES A NUMBER OF ENVIRONMENTAL TOPICS, INCLUDING LAND USE COMPATIBILITY, TRAFFIC, AIR QUALITY, NOISE, VISUAL, CULTURAL RESOURCES, AND OTHERS. AT THIS TIME, I WOULD LIKE TO SUMMARIZE THE SIGNIFICANT, AND UNAVOIDABLE IMPACTS ASSOCIATED WITH THE PROPERTY TAKES, THE TRAIN OPERATION SCENARIOS, THE STREET CLOSURES, GRADE SEPARATIONS, AND THE ALTERNATIVE LOCATIONS FOR THE SIERRA MADRE VILLA STATION PARK-AND-RIDE LOT, WHICH WHICH POTENTIALLY HAVE THE GREATEST IMPACT ON THIS PROJECT AND ON YOUR COMMUNITY.

FIRST, NOISE AND VIBRATION:

THE REEVALUATION OF SOUND WALLS ALONG MARMION WAY AND IN SOUTH PASADENA, ALONG WITH SEMI-EXCLUSIVE OPERATIONS WILL RESULT IN POTENTIAL NOISE AND VIBRATION IMPACTS.

THE CONSTRUCTION OF THE BELOW-GRADE SEPARATION AT THE INTERSECTION OF FIGUEROA STREET AND MARMION WAY MAY ALSO RESULT IN SIGNIFICANT SHORT-TERM NOISE IMPACTS.

TRANSPORTATION AND CIRCULATION:

THE RELOCATION OF THE PARK-AND-RIDE FACILITY FOR THE SIERRA MADRE STATION TO THE JOHNSON AND JOHNSON/MERCK SITE WILL POTENTIALLY IMPACT THE OPERATING CONDITIONS OF FIVE LOCAL INTERSECTIONS, AND FOUR INTERSECTIONS WOULD BE IMPACTED BY THE RELOCATION OF THE PARK AND RIDE LOT TO THE BUILDER'S EMPORIUM SITE.

CULTURAL RESOURCES:

LOSS OF POTENTIALLY HISTORIC STRUCTURES IN HIGHLAND PARK ALONG MARMION WAY, AND THE JOHNSON AND JOHNSON/MERCK FACILITY IN PASADENA WILL BE EVALUATED OR HAVE BEEN EVALUATED, AND POTENTIAL LOSS OR DAMAGE TO BURIED PREHISTORIC OR HISTORIC RESOURCES RESULTING FROM THE EXCAVATION FOR THE BELOW-GRADE SEPARATION, MIDWAY YARD ACCESS ROAD, AND ARROYO SECO BRIDGE FOUNDATIONS.

AT THIS TIME I'D LIKE TO SAY ONE MORE TIME IF YOU ARE INTERESTED IN PROVIDING PUBLIC TESTIMONY, PLEASE PICK UP ONE OF THE BLUE FORMS AT THE BACK AND TURN IT IN, AND WE'LL GET YOU TO SPEAK. THIS PUBLIC HEARING WILL CONTINUE ONLY UNTIL ALL OF THE PEOPLE WHO HAVE TURNED IN THEIR FORMS HAVE HAD THEIR THREE MINUTES, AND THEN I WILL FORMALLY CLOSE THE PUBLIC HEARING, AND WE CAN GO ON AND TALK UNTIL WE'RE KICKED OUT OF THE ROOM, I GUESS. I'M NOT SURE WHAT THE CLOSING TIME IS.

WITHOUT ANY FURTHER ADO, I'M GOING TO SIT DOWN,

AND I'M GOING TO CALL THE FIRST PERSON.

THE FIRST PERSON REQUESTING TO SPEAK IS ROBERT ARGOTT, AND THAT'S SPELLED A-R-G-O-T-T, I BELIEVE, AND FOLLOWING ROBERT WILL WILL BE DAVID KUEHN, K-U-E-H-N; IS THAT CORRECT?

MR. ARGOTT: YES.

MR. LANTZ: LET'S START WITH ROBERT ARGOTT, AND IF YOU WILL APPROACH THE MICROPHONE.

ONCE AGAIN, I'LL REMIND YOU, IF YOU DON'T FEEL COMFORTABLE SPEAKING PUBLICLY TODAY, YOUR WRITTEN COMMENTS ARE WELCOME PRIOR TO THE CLOSE OF THE PUBLIC COMMENT PERIOD.

MR. ARGOTT: MY NAME IS ROBERT ARGOTT. MY PROPERTY IS LOCATED AT 200 TO 204 1/2 NORTH AVENUE 58. THE NEW LIGHT RAIL APPARENTLY IS GOING TO TAKE THE ALLEY OR RIGHT OF WAY NEXT TO SIX GARAGES, AND I WILL NO LONGER HAVE ACCESS TO THESE GARAGES OR ANY WAY TO PROVIDE PARKING FOR THE SIX HOUSES NEXT TO THEM. ALSO, I USE THOSE GARAGES FOR STORAGE RIGHT NOW, AND THERE WOULD BE NO WAY OF USING THEM. I BELIEVE THAT THOSE GARAGES WILL HAVE TO BE TORN DOWN.

YOU'LL HAVE TO PAVE AN AREA TO PROVIDE OFF-STREET PARKING FOR THESE TENANTS, ALSO BECAUSE THAT 10 FOOT WIDE RIGHT OF WAY IS GOING TO BE ALMOST LIKE A LOSS OF PROPERTY TO ME FOR FUTURE BUILDING BECAUSE I WILL NOT BE ABLE TO USE THE CORNER OR THE SIDE OF THE ALLEY WHICH WILL BE BLOCKED.

THAT'S BASICALLY WHAT MY COMMENTS ARE EXCEPT THAT

I'M FOR THE LIGHT RAIL.

MR. LANTZ: THANK YOU VERY MUCH.

SINCE THIS IS A PUBLIC HEARING, THERE'S NO NEED FOR APPLAUSE OR "BOOS" OR ANY OTHER INTERACTION TONIGHT.

DAVID KUEHN FOLLOWED BY JOANNE BARKER, B-A-R-K-E-R.

MR. KUEHN: MY NAME IS DAVID KUEHN, K-U-E-H-N. I RESIDE AT 4159 CAMINO REAL, CITY OF LOS ANGELES.

I REQUEST THAT A CONCEPT WALL SITE PLAN OF THE GRADE SEPARATION AT MARMION AND FIGUEROA BE INCLUDED IN THE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT PRIOR TO ITS CERTIFICATION.

THAT'S MY ENTIRE COMMENT. THANK YOU.

MR. LANTZ: THANK YOU FOR YOUR COMMENT.

JOANNE BARKER FOLLOWED BY MR. PAT MOSER.

MS. BARKER: MY NAME IS JOANNE BARKER. I'M ONE OF THE IMPACTED PARCELS BETWEEN AVENUE 55 AND 56. MY ADDRESS IS 5518 MARMION WAY, AND I'M ALSO REPRESENTING THE INTERESTS 5522 MARMION WAY.

REGARDING THE PARCEL DESCRIPTIONS THAT ARE IN THE ENVIRONMENTAL IMPACT REPORT OF PLOTS PA 248 AND 249, THERE IS A MISREPRESENTATION OF THE ALLEY WIDTH. IT'S NOT 10 FOOT AS PROPOSED OR EXPRESSED, AND ACCORDING TO YOUR OWN MAPS IT'S 15 FOOT, ACCORDING TO THE PUBLIC WORKS MAPS.

AND I STILL HAVEN'T HAD THIS FIGURED OUT YET, BUT

COULD YOU PLEASE TELL ME WHY IT'S TAKEN FROM 1988 UNTIL NOW TO DISCUSS THE FIRE DEPARTMENT ACCESSIBILITY OR ANY PUBLIC SERVICE ACCESSIBILITY?

MR. LANTZ: WE WILL RESPOND IN WRITING IN THE ENVIRONMENTAL IMPACT REPORT. THAT'S A GOOD QUESTION.

MS. BARKER: AND AT THIS POINT I DON'T REALLY HAVE ANYTHING FURTHER.

MR. LANTZ: PAT MOSER, M-O-S-E-R, FOLLOWED BY I THINK IT'S BOB EVINGER.

MR. MOSER: PAT MOSER, SOUTHERN CALIFORNIA TRANSIT ADVOCATES. I'VE BEEN A RESIDENT OF NORTHEAST L.A. FOR MOST OF MY LIFE, ABOUT 33 YEARS.

NOISE MITIGATION: THERE WILL BE SKIRTS ON THE TRAINS. YOU DON'T HAVE -- WHEN YOU BUILD THE SOUND WALLS, THEY DO NOT HAVE TO COVER THE TRAINS. THEY CAN GO ALL THE WAY UP TO THE WINDOWS SO THERE'S NO NEED FOR YOU TO USE SOUND WALLS. IN THE -- IN ADDITION, THE TRAINS WILL -- EACH CAR WILL HAVE DIGITAL HORNS WHICH WILL MITIGATE THE LOUD NOISE AS THE TRAIN APPROACHES A GRADE CROSSING.

THERE WILL BE NO ADVERSE IMPACTS ON BUS SERVICE. EXAMPLE IS THE LONG BEACH BLUE LINE WHICH HAS SEEN A DRAMATIC INCREASE IN BUS SERVICE SINCE THE LONG BEACH BLUE LINE OPENED IN 1990; HOWEVER, THIS IS WHERE WE DISAGREE. INSTEAD, AN UNDER PASS AT FIGUEROA STREET/MARMION WAY, THERE SHOULD BE AERIAL FLY WAY WHICH WOULD FREE UP ADDITIONAL

MONEY TO SPEED UP THE CONSTRUCTION OF THE PASADENA BLUE LINE. THE ONLY REASON THAT THE UNDER PASS IS BEING BUILT IS BECAUSE OF PRESSURE FROM THE MOUNT WASHINGTON ASSOCIATION. 30 PEOPLE OUT OF THE THOUSANDS OF PEOPLE WHO LIVE ON MOUNT WASHINGTON ARE FORCING THE TAXPAYERS TO PAY AN ADDITIONAL AMOUNT OF MONEY FOR NOTHING. INSTEAD OF WASTING UP TO $15 MILLION TO CONSTRUCT HOV LANES, THE BALANCE OF THAT $15 MILLION SHOULD BE TRANSFERRED OVER WHICH WOULD HELP SPEED UP CONSTRUCTION OF THE PASADENA BLUE LINE AND THE OTHER RAIL LINES UNDER CONSIDERATION, SUCH AS THE EXPOSITION BLUE LINE. THEN EXISTING MONEY IN THE TRANS-CAPITAL FUND WOULD BE PRANSFERRED OVER TO THE OPERATING FUND SO THAT THERE WOULD BE NO NEED TO HAVE THIS FOOLISH PUBLIC HEARING ON APRIL 23RD TO CUT BACK DRASTICALLY BUS AND MAIL SERVICE AND TO INCREASE AFFAIRS.

I WOULD LIKE TO SAY THAT NORTHEAST L.A. IS VIRTUALLY UNANIMOUS IN FAVOR OF THE PASADENA BLUE LINE. THERE IS ALMOST NOBODY WHO IS AGAINST IT, AND THAT INCLUDES THE CITY OF SOUTH PASADENA AND THE CITY OF PASADENA. ALL THREE AREAS ARE VIRTUALLY UNANIMOUS IN FAVOR.

AND BEFORE I GO, LET ME SAY THAT ON APRIL 23RD, THE PUBLIC HEARING THAT I SPOKE OF TO DRASTICALLY CUT BACK BUS AND RAIL SERVICE AND TO INCREASE FARES WILL BE HELD AT 10:00 A.M. AT THE BOARD OF SUPERVISOR HEARING ROOM, WHICH IS AT 500 WEST TEMPLE STREET AT GRAND AVENUE, AND THAT'S

SATURDAY, APRIL 23RD, 10:00 A.M.

THANK YOU FOR YOUR TIME.

MR. LANTZ: THANK YOU.

BOB EVINGER, AND THEN I GUESS IT'S VICTOR ARRADONDO.

MR. EVINGER: ROBERT EVINGER, E-V-I-N-G-E-R, AND I LIVE AT 369 NORTH AVENUE 53 IN HIGHLAND PARK FOR THE PAST 18 YEARS.

I'D LIKE TO ADDRESS THE LAST SPEAKER. IT'S MORE THAN 30 PEOPLE THAT WANTED THE GRADE TO BE UNDERNEATH --

(INAUDIBLE INTERRUPTION)

BASICALLY I'M HERE TO SPEAK ON BEHALF OF MYSELF AS WELL AS THE HIGHLAND PARK HERITAGE TRUST. WE HAVE BEEN WORKING WITH THE MTA FOR A NUMBER OF YEARS NOW TO MITIGATE ANY PROBLEMS OF WHAT HAPPENED TO HISTORIC STRUCTURES WITHIN HISTORIC CORRIDORS IN THE HIGHLAND PARK AREA, ESPECIALLY THE MARMION WAY CORRIDOR WHICH CUTS DIRECTLY THROUGH THE CENTRAL PART OF THE CENTRAL HISTORIC DISTRICT.

WHAT I GATHER IN READING SEIR IS WE CONSTANTLY TALK ABOUT RELOCATION OF RESIDENTS AND THE DEMOLITION OF STRUCTURES, AND SOME OF THE STRUCTURES ARE NOT HISTORIC AND SOME OF THE STRUCTURES ARE HISTORIC, BUT WHAT I WOULD RATHER HEAR THEM SAY IS A RELOCATION OF RESIDENTS AND A RELOCATION OF HISTORIC STRUCTURES. THIS OPINION WAS EXPRESSED BY THE CITY PLANNING COMMISSION LAST OCTOBER WHEN THEY APPROVED IN

HIGHLAND PARK OVERLAY ZONE ASKING MTA TO DO WHATEVER THEY COULD TO MITIGATE ALL HISTORIC STRUCTURES BY MOVING THEM WHENEVER THEY COULD, AND THEY EVEN ASKED FOR THE COMPLETE RENOVATION OF THESE BUILDINGS.

I HAVE TALKED TO SEVERAL STAFF CONCERNING THAT, AND I THINK WE CAN CONTINUE TO TALK ABOUT MOVING SOME OF THESE STRUCTURES. OF PARTICULAR INTEREST TO US IS 5323, A BROWN BUNGALOW STRUCTURE WHICH I'M TRYING TO RELOCATE IN ECHO HAZE AREA IF POSSIBLE.

AND SEVERAL HOUSES THAT WERE TAKEN IN THE INITIAL EIR, WHICH AREN'T ADDRESSED UNDER THE SEIR I THINK AT 5030 MARMION AND 130 AND 144 AVENUE 51 SHOULD BE LOOKED AT FOR RELOCATION. AND WE WOULD WORK WITH THE COUNSEL OFFICES AND WITH MTA TO FIND APPROPRIATE LOCATIONS FOR THOSE RELOCATIONS.

I MUST -- WE MUST TAKE EXCEPTION TO THE TAKING OF 5318 AND 5 -- 5518 AND 5520 MARMION WAY, TWO VERY HISTORIC HOMES, TO MAKE WAY FOR WHAT YOU SAY THE FIRE DEPARTMENT NEEDS FOR A MAJOR U-TURN ABILITY. I WISH WE COULD FIND SOME OTHER WAYS TO MITIGATE THAT BY FINDING OUT WHETHER THE FIRE DEPARTMENT COULD TAKE OTHER AVENUES RATHER THAN DESTROYING THOSE TWO HOMES.

I GUESS THAT'S PRETTY MUCH EVERYTHING I WANT. I UNDERSTAND THAT SOME OF THE HOMEOWNERS THAT WERE SUPPOSEDLY CONTACTED AND ACCEPTED AND WERE INTERESTED IN IT ACTUALLY

WERE NOT CONTACTED AND ARE NOT INTERESTED IN BEING BOUGHT OUT AND RELOCATED.

I JUST WANT TO SAY IN CLOSING THAT WE HAVE ALWAYS SUPPORTED THE MTA AND THE BLUE LINE THROUGH HIGHLAND PARK TO PASADENA AND BEYOND. WE REALLY SUPPORT THE BELOW-GRADE SEPARATION AT MARMION AND FIGUEROA, AND WE ALSO SUPPORT YOUR RECONSIDERATION OF SOUND WALLS THROUGH THE MARMION WAY CORRIDOR WHICH WOULD DIVIDE THE COMMUNITY AND BE DANGEROUS TO BOTH THE ENGINEERS AND TO PEDESTRIANS. THANK YOU VERY MUCH.

MR. LANTZ: THANK YOU.

VICTOR ARRADONDO. FOLLOWED BY CHARLES FISHER.

MR. ARRADONDO: MY NAME IS VICTOR ARRADONDO, A-R-R-E-D-O-N-D-O. I LIVE ON 3625 MARMION WAY, AND MY QUESTIONS ARE WHEN CONSTRUCTION WORKERS START ON THAT UNDER PASS, WHERE ARE THEY GOING TO PARK? WHAT TIME THEY GOING TO START? WHAT TIME THEY GOING TO STOP? WHO IS THE CONTACT PERSON IN CASE WE GOT ANY COMPLAINTS? AND MACHINERY. HOW MUCH IMPACT IS THAT GOING TO HAVE ON ALL THAT BLOCK IN THERE?

I LIVE ONLY 50 FEET AWAY FROM THAT EXCAVATION, AND I WOULD LIKE TO HAVE ANSWERS ON THESE QUESTIONS BECAUSE SINCE 1986, WHEN I STARTED ON THIS DEAL, I HAVEN'T GOT STRAIGHT ANSWERS YET.

SO PLEASE, IF YOU CAN DO IT THIS TIME, TELL ME.

MR. LANTZ: I THINK YOU'VE ASKED THE QUESTIONS AT THE RIGHT PLACE, AND WE'LL RESPOND IN WRITING.

CHARLES FISHER, FOLLOWED BY ROSE, AND I'LL HAVE YOU PRONOUNCE YOUR LAST NAME.

MS. XOCHIAUA: XOCHIAUA.

MR. FISHER: MY NAME IS CHARLIE FISHER. I'M THE CHAIRMAN OF THE HIGHLAND PARK NEIGHBORHOOD ASSOCIATION. I'M JUST SPEAKING AGAIN TO REITERATE THE NEIGHBORHOOD ASSOCIATION'S SUPPORT OF THE BLUE LINE THROUGH HIGHLAND PARK AND BEYOND. IT'S LONG OVERDUE. MY PERSONAL OPINION IS THEY NEVER SHOULD HAVE RIPPED OUT THE RED CARS AND YELLOW CARS IN THE FIRST PLACE. BUT WE'RE HERE NOW.

WE DO HAVE QUESTIONS AGAIN REGARDING SOME OF THE TAKINGS AND OF COURSE THE RELOCATION. MR. EVINGER SPOKE ABOUT THIS, AND SO DID MISS BARKER OVER AT 5518. THOSE TWO IN PARTICULAR WE ARE VERY CONCERNED ABOUT BECAUSE THEY ARE BOTH HISTORIC HOMES, AND WHEN WE INITIALLY DID OUR OWN STUDY, WE DIDN'T EVEN THINK THOSE HOMES WOULD BE TAKEN BECAUSE THEY BOTH HAD SUCH BIG SETBACKS. WE DIDN'T THINK THERE WOULD BE SUCH A MASSIVE CUT IN THE ALLEY SO THE FIRE TRUCKS COULD DO THE U-TURN.

THE OTHER -- THERE IS A THIRD ALLEY THAT GOES THROUGH THAT BLOCK AND BISECTS IT. OUR FEELING IS THAT THERE IS PLENTY OF ACCESS TO THAT PARTICULAR BLOCK, AND THAT BLOCK HAS MUCH MORE ACCESS THAN MOST BLOCKS DO IN THE

HIGHLAND PARK AREA. WE DON'T FEEL THAT THE TAKING OF THESE TWO HOUSES IS ANYWHERE NECESSARY.

THE OTHER ONES IN PARTICULAR I JUST WANT TO REMIND THE MTA ABOUT THE AVENUE 61 POWER SUBSTATION, THAT WE ARE ASKING THAT THE POSSIBILITY OF RELOCATING THAT STATION TO BESIDE A PORTION OF AVENUE 61, THE INDUSTRIAL PROPERTY THAT IS LOCATED NEXT DOOR, WHICH AT THE TIME THAT THE ORIGINAL EIR WAS DONE WAS OPERATED BY AQUA-VEND WATER. BUT THEY HAVE SINCE MOVED OUT, AND THIS PROPERTY HAS BEEN VACATED BY ALMOST THREE YEARS NOW AND DETERIORATING.

THIS IS SOMETHING THAT CAN BE LOOKED AT, AND WE THEREFORE WOULD NOT HAVE TO REMOVE HISTORIC HOUSING. AND JUST A REMINDER. I KNOW THAT THERE A A LOT MORE THAN 30 FAMILIES IN THE MOUNT WASHINGTON ASSOCIATION.

MR. LANTZ: ROSE. AND THAT'S ALL THE THE FORMS I HAVE. SO IF ANY OF YOU WOULD LIKE TO TESTIFY, PLEASE TURN IN YOUR FORMS. AND IN ADDITION, ON THE BACK OF THIS BLUE FORM, I'VE JUST LEARNED IS A PLACE WHERE YOU CAN ACTUALLY WRITE YOUR COMMENTS TONIGHT. SO WE'RE EVEN PROVIDING YOU THE PAPER AND THE LINE.

A. ROSE XOCHIAUA, X-O-C-H-I-A-U-A. I LIVE AT 207 NORTH AVENUE 53 AND HAVE BEEN THERE FOR EIGHT YEARS. I'VE BEEN IN THE COMMUNITY FOR 19 YEARS. I, TOO, LOOK FORWARD TO THE METRO LINE COMING THROUGH HIGHLAND PARK. IT'S LONG OVERDUE I REALIZE. AND ONE TO MY SURPRISE, I ORDERED THE EIR

REPORT, AND I DID NOTICE OUR ADDRESS UP THERE, WHICH IS THE FIRST I'VE EVER SEEN. IT'S -- I'VE NEVER BEEN NOTIFIED OF ANYTHING OR ANY INTEREST TO OUR PROPERTY.

SECONDARY, I'M OPPOSING THE CLOSURE OF AVENUE 53. MY MAIN CONCERN IS THE CRIME PROBLEM ON AVENUE 53 AND MONTA VISTA. BY CLOSING THAT STREET, IT WILL DEFINITELY CLOSE OUR IMMEDIATE STREET OFF TO THE ENTIRE COMMUNITY AND OPENING UP INTO A CRIME AREA THAT WE'D RATHER AVOID RATHER THAN BE CONFRONTED WITH. LOCKING US OUT WOULD BE AGAINST EVERYTHING I CAN THINK OF. WE WORKED VERY HARD TO KEEP THAT STREET IN ORDER AND HAVE WORKED WITH THE LAW ENFORCEMENT VERY MUCH. SO TO SEE IT BLOCKED OFF, I JUST DON'T FIND IT BEING JUST.

SECONDARY, BY CLOSING AVENUE 53, I DON'T SEE WHERE IT WOULD SPEED UP THE TRAIN ANY MORE BY MAYBE A FRACTION OF A SECOND OR SO I CAN'T IMAGINE.

OKAY. AND THAT'S MY TESTIMONY.

MR. LANTZ: ANYONE ELSE? NO OTHER REQUESTS TO SPEAK?

WELL, THANK YOU ALL FOR COMING TONIGHT. WE'LL BE DOING AN OPEN HOUSE, AND I DECLARE THE PUBLIC HEARING FORMALLY CLOSED.

(PROCEEDINGS CONCLUDED AT 7:38 P.M.)

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REPORTER'S CERTIFICATE

I CERTIFY THAT THE FOREGOING IS A CORRECT TRANSCRIPT FROM THE RECORD OF PROCEEDINGS IN THE ABOVE-ENTITLED MATTER.

Mark Schweitzer

MARK SCHWEITZER

DATE: April 29, 1994

LOS ANGELES COUNTY

METROPOLITAN

TRANSPORTATION AUTHORITY

PUBLIC HEARING

PACIFIC HASTINGS RANCH LIBRARY
3325 EAST ORANGE GROVE BOULEVARD
PASADENA, CALIFORNIA

WEDNESDAY, APRIL 20, 1994

COMMENCING AT 6:30 P.M.

REPORTED BY: MARK SCHWEITZER

PASADENA, CALIFORNIA; WEDNESDAY, APRIL 13, 1994

6:30 P.M.

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MR. CUETO: I'M GOING TO GO AHEAD AND START WITH THE FIRST PART OF TONIGHT'S MEETING. BEFORE I GET STARED STARTED, BEFORE I ACTUALLY START WITH THE -- IF ANYONE HAS ANY COMMENTS THAT THEY WOULD LIKE TO MAKE AS TO THE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT WHICH HAS BEEN PRODUCED FOR BY THE MTA FOR THE PASADENA BLUE LINE PROJECT, WOULD YOU PLEASE FILL OUT ONE OF THESE BLUE CARDS? MARTA MAESTAS HAS THE CARDS AND WILL MAKE THEM AVAILABLE FOR YOU. IF YOU WOULD LIKE TO SPEAK, YOU MUST FULL OUT ONE OF THESE CARDS. IT IS IMPORTANT THAT YOU DO SO. SO WITH THAT IN MIND, LET'S GET STARTED WITH THE PROCEEDINGS FOR TONIGHT'S MEETING.

MY NAME IS ART CUETO. I'M A PROJECT MANAGER WITH THE METROPOLITAN TRANSPORTATION AUTHORITY, THE AGENCY WHICH IS RESPONSIBLE FOR THE CONSTRUCTION OF THE BLUE LINE. WITH ME THERE ARE SEVERAL STAFF MEMBERS PRESENT WHO ARE PARTICIPATING IN THE PLANNING AND CONSTRUCTION OF THIS PROJECT. AT THIS TIME I'D LIKE INTRODUCE THEM TO YOU.

OVER THERE TO MY RIGHT IS HARLEY MARTIN. HE'S WITH THE MTA, AN ENVIRONMENTAL SPECIALIST. NEXT TO HIM IS C.C. MELINSON. SHE'S WITH MTA REAL ESTATE. IN THE BACK --

OH, MY BOSS, STEVE, IS HERE. STEPHEN LANTZ, HE'S THE AREA DIRECTOR FOR THE SAN GABRIEL VALLEY AREA TEAM. ALSO IN THE BACK IS MARTA MAESTAS, WHO IS MTA PUBLIC AFFAIRS, AND ALSO FRED PIERSON. THERE'S FRED. HE'S OUR TRAFFIC CONSULTANT FOR THE PROJECT.

SO WITH THAT IN MIND, WE'LL GO AHEAD.

DO YOU WANT TO COME UP HERE STEVE, OR DO YOU WANT ME TO DO IT?

WITH THAT IN MIND, I'LL HAVE STEVE TAKE OVER.

WELL, BEFORE I DO THAT IF ANYBODY DESIRES ANY TRANSLATION OF THESE PROCEEDINGS TO SPANISH, WE HAVE OUR SPANISH INTERPRETER HERE. HER NAME IS LINDA KRAUSEN.

MR. LANTZ: THIS IS A BIT OF A REUNION FOR ME. I WORKED MY WAY THROUGH HIGH SCHOOL IN THIS LIBRARY AS A PAGE AND A CLERK. SO I THOUGHT I COULD GET OUT HERE WITH ALL DUE SPEED, AND I APOLOGIZE FOR THE TRAFFIC THAT HAS OCCURRED IN THE LAST 20 OR 30 YEARS. IT'S A LITTLE SLOWER GETTING HERE NOW THAN IT WAS WHEN I WAS A KID, EVEN WITH THE FREEWAY THAT WASN'T HERE WHEN I WAS A KID.

ON BEHALF OF THE TEAM MEMBERS, I'D ALSO LIKE TO WELCOME YOU HERE TODAY TONIGHT. THIS IS A FORMAL PUBLIC HEARING IN THAT WE'VE ISSUED A SECOND SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT. WE ARE HOLDING THIS PUBLIC HEARING IN ADDITION TO ANOTHER ONE THAT WAS HELD LAST WEEK TO RECEIVE PUBLIC COMMENT.

DURING THE FORMAL PUBLIC HEARING, WE WON'T BE GETTING INTO DIALOGUE WITH YOU. WE WON'T BE ANSWERING QUESTIONS; HOWEVER, THE STAFF WILL BE HERE AFTER THE FORMAL HEARING PERIOD AFTER YOU'VE MADE YOUR PUBLIC COMMENTS, AND WE CAN TALK TO YOU ABOUT IT. BUT DURING THE PUBLIC HEARING UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, WE DO NEED TO HAVE IT BE YOUR COMMENTS THAT ARE ACCURATELY RECORDED. WE WILL THEN PREPARE WRITTEN RESPONSES TO THOSE COMMENTS THAT YOU MAKE, AND WE WILL REPLY IN A FINAL ENVIRONMENTAL IMPACT REPORT TO CONSIDER YOUR COMMENTS AND TO REPLY TO THEM.

THE PROCEDURES THAT WE'LL BE FOLLOWING THIS EVENING ARE FAIRLY STRAIGHTFORWARD. IF YOU'D LIKE TO SPEAK -- I SEE SOME OF YOU HAVE ALREADY TURNED IN REQUEST TO SPEAK CARDS, THE BLUE CARDS. ON THE BACK OF THESE CARDS ARE WRITTEN COMMENT CARDS. SO IF YOU DON'T FEEL LIKE YOU WANT TO MAKE A SPEECH IN FRONT OF THE GROUP BUT YOU WANT YOUR COMMENTS NOTED, PLEASE WRITE THEM DOWN AND TURN IN THE CARD NOW.

THE PUBLIC COMMENT PERIOD WILL ALSO BE EXTENDED UNTIL MAY 9TH. SO IF YOU HEAR SOME THINGS HERE TONIGHT THAT GET YOUR BRAIN CELLS FLOWING, AND YOU WANT TO SIT DOWN AND WRITE US A MORE LENGTHY LETTER WITH SPECIFIC CONCERNS THAT YOU'D LIKE US TO ADDRESS AS WE COMPLETE THE ENVIRONMENTAL DOCUMENTATION, PLEASE FEEL FREE TO SUBMIT THOSE TO US BY MAY

9TH, AND THAT NEEDS TO BE SENT TO THE L.A. COUNTY METROPOLITAN TRANSPORTATION AUTHORITY AT 8189 WEST 7TH STREET, L.A. 90017.

A LITTLE BACKGROUND ON THIS HEARING. IN THE SPRING OF 1990, THE L.A. COUNTY TRANSPORTATION COMMISSION CERTIFIED AN ENVIRONMENTAL IMPACT REPORT FOR THE PASADENA-LOS ANGELES LIGHT RAIL TRANSIT PROJECT. MODIFICATIONS THAT HAVE BEEN MADE TO THE ORIGINAL PROJECT HAVE REQUIRED THE PREPARATION, FIRST, OF A SUPPLEMENTAL EIR IN 1992.

ADDITIONAL DESIGN WORK AND ENGINEERING HAVE UNCOVERED FURTHER MODIFICATIONS WHICH NOW REQUIRE A SECOND SUPPLEMENTAL EIR. PERHAPS THIS WILL BE OUR LAST BEFORE WE ACTUALLY APPROVE A PROJECT AND GET DOWN TO CONSTRUCTING IT. BUT AT THIS POINT THE CHANGES AND MODIFICATIONS THAT HAVE BEEN MADE ARE SUCH THAT WE ARE GOING THROUGH A FORMAL CIRCULATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT SUPPLEMENT. THE INTENT OF THIS SUPPLEMENTAL EIR IS TO ADDRESS ONLY THE INFORMATION NECESSARY TO MAKE THE PREVIOUSLY CERTIFIED DOCUMENTS ADEQUATE FOR THE PROJECT AS IT'S BEEN REVISED.

THIS SUPPLEMENTAL EIR IS PREPARED SO THAT THAT NEW INFORMATION AND THE DESIGN ALTERNATIVES COULD BE ANALYZED AND REVIEWED BY THE PUBLIC PRIOR TO US INCORPORATING THEM WITH MITIGATIONS INTO OUR PROJECT.

THE PROPOSED PROJECT CONSISTS OF SEVEN AREAS OF MODIFICATION TO THE ADOPTED LIGHT RAIL PROJECT WHICH REQUIRE ANALYSIS IN THIS DOCUMENT.

THEY INCLUDE THE ACQUISITION OF SIX ADDITIONAL PROPERTIES AND UP TO 50 MINOR CURB CUTS ALONG MARMION WAY BETWEEN AVENUES 50 AND 60, TO PROVIDE IMPROVED ACCESS FOR EMERGENCY VEHICLES ALONG THIS PORTION OF THE ALIGNMENT;

CHANGING THE OPERATIONAL MODE FROM STREET RUNNING TO SEMI-EXCLUSIVE RIGHT OF WAY BETWEEN AVENUES 51 AND 61 WITH RESULTING MODIFICATIONS TO GATED CROSSINGS, WARNING SIGNALS, AND CLOSURE OF AT-GRADE STREET CROSSINGS AT AVENUES 51, 53, 55, 58, AND 61;

REEVALUATION OF SOUND WALL MITIGATION MEASURES;

AND IMPORTANT TO THIS AREA, ALTERNATIVE LOCATIONS TO THE PREVIOUSLY CLEARED SPACE BANK FACILITY FOR THE SIERRA MADRE VILLA STATION'S PARK-AND-RIDE FACILITY. ALTERNATIVE SITES INCLUDE THE JOHNSON AND JOHNSON/MERCK, OR THE BUILDER'S EMPORIUM PROPERTIES;

AND THEN FINALLY A BELOW-GRADE SEPARATION OF THE INTERSECTION OF MARMION WAY AND FIGUEROA STREET.

THE SUPPLEMENTAL EIR ADDRESSES A NUMBER OF ENVIRONMENTAL TOPICS INCLUDING LAND USE COMPATIBILITY, TRAFFIC, AIR QUALITY, NOISE, VISUAL, CULTURAL RESOURCES, AND OTHERS. AT THIS TIME I'D LIKE TO SUMMARIZE THE SIGNIFICANT AND UNAVOIDABLE IMPACTS ASSOCIATED WITH THE PROPERTY TAKES,

THE TRAIN OPERATION SCENARIOS, THE STREET CLOSURES, THE GRADE SEPARATIONS, AND THE ALTERNATIVE LOCATIONS FOR THE SIERRA MADRE VILLA STATION PARK-AND-RIDE LOT.

THEY ARE NOISE AND VIBRATION:

THE REEVALUATION OF SOUND WALLS ALONG MARMION WAY AND IN SOUTH PASADENA, ALONG WITH SEMI-EXCLUSIVE OPERATIONS WILL RESULT IN POTENTIAL NOISE AND VIBRATION IMPACTS.

THE CONSTRUCTION OF THE BELOW-GRADE SEPARATION AT THE INTERSECTION OF FIGUEROA STREET AND MARMION WAY MAY RESULT IN SIGNIFICANT SHORT-TERM NOISE IMPACTS DUE TO CONSTRUCTION.

TRANSPORTATION AND CIRCULATION:

THE RELOCATION OF THE PARK-AND-RIDE FACILITY FOR THE SIERRA MADRE STATION TO THE JOHNSON AND JOHNSON/MERCK SITE WILL POTENTIALLY IMPACT THE OPERATING CONDITIONS OF FIVE LOCAL INTERSECTIONS AND FOUR INTERSECTIONS WOULD BE IMPACTED BY THE RELOCATION OF THE PARK-AND-RIDE LOT TO THE BUILDER'S EMPORIUM SITE.

THERE'S A POTENTIAL LOSS OF HISTORIC STRUCTURES IN HIGHLAND PARK ALONG MARMION WAY, AND THE JOHNSON AND JOHNSON/MERCK FACILITY IN PASADENA THAT MAY BE LOST.

POTENTIAL FOR LOSS OR DAMAGE TO BURIED PREHISTORIC AND/OR HISTORIC RESOURCES MIGHT RESULT FROM THE EXCAVATION OF THE BELOW-GRADE SEPARATION, MIDWAY YARD ACCESS ROAD, AND ARROYO SECO BRIDGE FOUNDATIONS THAT NEED TO BE

RECONSTRUCTED.

THIS SAME TESTIMONY OR SAME INTRODUCTION WAS GIVEN AT THE OTHER PUBLIC HEARING. SO THERE'S ISSUES THAT ARE OF CONCERN IN ALL STRETCHES OF THE PROJECT WITH THIS SECOND ENVIRONMENTAL.

AT THIS TIME I WOULD LIKE TO OPEN THE PUBLIC HEARING TO COMMENTS. YOU'LL EACH HAVE UP TO THREE MINUTES FOR YOUR COMMENTS. ART HERE HAS HIS TRUSTY STOPWATCH THAT GOES BEEP, BEEP, BEEP. LAST TIME WE WERE IN AN AUDITORIUM AND THE BELLS WENT OFF. BUT I THINK WHAT WE'D LIKE -- IF YOU HEAR THE BEEP, BEEP, BEEP, I'LL SIMPLY ASK YOU TO CONCLUDE SO THAT OTHER TESTIMONY CAN BE HEARD.

ONCE I HAVE FINISHED WITH THE BLUE REQUEST TO SPEAK CARDS THAT ARE HERE, I'LL ASK FOR ANY ADDITIONAL CARDS OR ANY OTHER ADDITIONAL SPEAKERS. IF THERE ARE NONE, WE'LL CLOSE THE PUBLIC HEARING. IN ADDITION, AS I SAID BEFORE, IF YOU DIDN'T GET A CHANCE TO SPEAK, FEEL FREE TO WRITE US THE WRITTEN NOTE OR SUBMIT WRITTEN COMMENTS BEFORE MAY 9TH.

FINALLY, WHEN YOU DO COME UP TO SPEAK, PLEASE HELP OUR COURT REPORTER, WHO IS TAKING THIS DOWN AS VERBATIM AS HE CAN, BY SPELLING YOUR LAST NAME. IF YOU ARE AFFILIATED WITH ANY ORGANIZATION, WHOSE VIEW YOU REPRESENT OFFICIALLY. PLEASE GIVE US THE NAME OF THAT ORGANIZATION SO THAT WE CAN REFLECT THE FACT THAT IT'S AN ORGANIZATIONAL OPINION RATHER THAN A PERSONAL POSITION.

OTHER THAN THAT, I THINK THAT AT THIS TIME THREE CARDS THAT I HAVE SO FAR ARE FRED ZAPATA, TIMOTHY PRICE AND CLIFF BENEDICT: SO LET'S START WITH FRED. AND THERE'S A MICROPHONE OVER HERE ON YOUR RIGHT SIDE. SO IF YOU COME UP TO THE MICROPHONE AND SPEAK INTO THE MICROPHONE, THAT WOULD HELP US ALL OUT. IS FRED ZAPATA HERE?

OH, HE DIDN'T WISH TO SPEAK? WE'RE A THIRD DOWN.

SECOND, TIMOTHY PRICE.

MR. PRICE: MY NAME IS TIMOTHY PRICE, I'M PRESIDENT OF THE DAISYVILLE HOME OWNERS ASSOCIATION. EVEN THOUGH WE REALIZE THAT THE EIR REPORT DOES NOT REQUIRE YOU TO TAKE IN OTHER PROSPECTIVE CONDITIONS THAT MIGHT HAPPEN IN OUR NEIGHBORHOOD, ALBEIT THE DATA TAPE PROPERTY PASADENA SKILL CENTER, WE FEEL THAT WE WANT TO BE ON RECORD THAT THIS SUPPLEMENTAL ONLY EXPRESSES ONE VIEW, AND THAT'S OF THE TRAFFIC PATTERNS IF THE LIGHT RAIL AND WHEN THE LIGHT RAIL GOES IN.

IT DOES NOT EXPRESS TRAFFIC PATTERNS OF THE PCC SKILL CENTER OR WHAT'S GOING TO BE DEVELOPED ON THE PROPERTY; THEREFORE, WE FEEL EVEN THOUGH OFFICIALLY IT'S A CORRECT DOCUMENT, UNOFFICIALLY IT'S FLAWED BECAUSE WE STILL HAVE OTHER DOCUMENTS TO TAKE INTO CONSIDERATION.

THANK YOU.

MR. LANTZ: OKAY. CLIFF BENEDICT.

MR. MBENEDICT: I HAVE SEVERAL COMMENTS TO MAKE

REGARDING YOUR REPORT.

FIRST OF ALL, I'D LIKE TO CONGRATULATE YOU ON DOING THE TRAFFIC STUDIES THAT WE REQUESTED BE DONE BACK IN 1991, LATE 1991 AND EARLY 1992.

WE FINALLY FOUND THEM IN THIS LATEST REPORT.

IT DOES DEEPLY CONCERN MYSELF, HOWEVER, THAT THESE TRAFFIC REPORTS INDICATE PRECISELY WHAT WE FORESAW TWO OR THREE YEARS AGO, AND THAT WAS THAT WE WERE GOING TO HAVE SIGNIFICANT TRAFFIC IMPACTS AT FOUR MAJOR LOCATIONS IN OUR EAST END OF PASADENA, BEING COLORADO AND ROSEMEAD, FOOTHILL AND ROSEMEAD, SIERRA MADRE AND FOOTHILL, AND -- WELL, ONE OTHER ONE.

IT'S ON YOUR MAP.

LEVEL "F" MITIGATED IS NOT ACCEPTABLE. I MEAN REALLY, YOU'RE LOOKING AT MAJOR DELAYS IN INTERSECTIONS, AND THAT'S BY YOUR OWN DEFINITION.

"E" IS BAD ENOUGH WHEN YOU GET OCCASIONAL DELAYS, BUT "F" IS GRID LOCK, AND I THINK SOMETHING HAS TO BE DONE FURTHER IN THE WAY OF MITIGATION TO LOOK AT WHAT ALTERNATIVES CAN BE MADE IN ORDER TO ALLEVIATE THAT TRAFFIC PROBLEM.

YOU LOOKED AT CO2 EMISSIONS, AND THOUGH YOU DID SOME WORK ON THAT ONE, THE -- BY YOUR OWN STANDARDS THERE ARE TIMES WHEN YOU ARE YOU BARELY, BARELY WITHIN THE MAXIMUM ACCEPTABLE LEVEL OF CO2 EMISSIONS IN AN EIGHT-HOUR PERIOD,

8.8 PARTS PER MILLION, WHEN THE MAXIMUM IS 9. AND I THINK THAT'S COMING AWFULLY CLOSE. AS A MATTER OF FACT, I WOULD ALMOST CHALLENGE YOU TO GIVE US THE DETAILED ANALYSIS OF HOW THAT WAS CALCULATED BECAUSE I COULD THINK THAT YOU COULD SLIP OVER THE OTHER SIDE OF 9 JUST AS EASILY AS YOU COULD SLIP UNDER 9 KNOWING WHAT THE LEVEL IS.

SO I WOULD ASK YOU TO TAKE A LOOK AT THAT.

AND THE LAST THING IS THAT THIS WEEK I ACQUIRED A COPY, ALBEIT IT WAS DONE BY I GUESS SOME STAFF ENGINEER, THAT GAVE PROPOSED LAYOUT FOR THE JOHNSON AND JOHNSON SITE. HERE IT IS. IT SAYS THE CONSTRUCTION OF THE PARK-AND-RIDE FACILITY WOULD BE CONSTRUCTED AT THE PROPOSED JOHNSON AND JOHNSON WORK SITE OR AT THE ALTERNATE BUILDER'S EMPORIUM SITE. AT EITHER SITE, PROPOSED THREE STORY STRUCTURE WOULD BE CONSTRUCTED WITH TWO AND A HALF LEVELS FOR THE PARKING OF A FEW CAR'S AND A HALF LEVEL OF GRADE FOR BUS LOADING, UNLOADING AND LAYOVER.

THIS DRAWING -- AND IT'S UNDATED -- PROPOSED A THOUSAND CAR PARK ENCOMPASSING EVERYTHING FROM SIERRA MADRE VILLA TO HALSTEAD, TAKING AWAY A PROPERTY THAT DOES NOT BELONG TO JOHNSON AND JOHNSON. IT BELONGS TO SOME OTHER INDIVIDUAL THAT BOUGHT IT. AND I WOULD CALL TO YOUR ATTENTION THAT ALL THROUGH THE DISCUSSIONS OF THIS DEVELOPMENT OF THE SIERRA MADRE TERMINAL -- YEAH, TERMINAL, WE TALKED ABOUT HAVING MULTIPLE STORY PARK FACILITIES

PROVIDED THAT WOULD ALSO THEN PROVIDE ROOM FOR BUSINESSES TO BE DEVELOPED THAT WOULD BE COMPATIBLE TO THE TYPE OF BUSINESS THAT YOU WOULD ASSOCIATE WITH EGRESS AND SO FORTH FROM A STATION.

IF YOU COVER THE WHOLE DARN THING WITH PARKING LOT, THAT WON'T LEAVE ANY ROOM TO DO THAT. SO WE APPRECIATE YOUR TAKING THAT INTO CONSIDERATION.

THANK YOU.

MR. LANTZ: OKAY. IS THERE ANYBODY ELSE WHO WOULD WISH TO TURN IN A REQUEST TO SPEAK SLIP, A BLUE SLIP?

HEARING NONE, THEN I DEEM THE PUBLIC HEARING CLOSED AND THANK YOU ALL FOR COMING. I KNOW THERE'S ANOTHER MEETING FOLLOWING, BUT WE'LL BE IN THE BACK, AND WE CAN TALK ONE ON ONE ABOUT -- INFORMALLY ABOUT SOME OF THE ISSUES THAT HAVE BEEN RAISED. AND ANY OF YOU WHO WOULD LIKE TO TALK INFORMALLY OFF THE RECORD TO US ABOUT CONCERNS THAT YOU HAVE, THAT'S FINE. IF YOU WANTED TO GET A LITTLE MORE CONVERSATION BEFORE WRITING YOUR COMMENTS, WE'D BE HAPPY TO HELP YOU GET A LITTLE MORE ANALYSIS BEFORE YOU WRITE IT DOWN, TOO.

SO THANKS AGAIN FOR COMING TONIGHT, AND THE HEARING IS CLOSED.

(PROCEEDINGS CONCLUDED AT 6:53 P.M.)

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REPORTER'S CERTIFICATE

I CERTIFY THAT THE FOREGOING IS A CORRECT TRANSCRIPT FROM THE RECORD OF PROCEEDINGS IN THE ABOVE-ENTITLED MATTER.

Mark Schweitzer
MARK SCHWEITZER

DATE: April 29, 1994

LA-04386

CULTURAL RESOURCES OVERVIEW

28 pp
18) Other Historic
unknown acreage
4) Road Construction
Los Angeles # 1103
8 sites ?
Pasadena

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY'S

INTERSTATE COMMERCE COMMISSION ABANDONMENT EXEMPTION

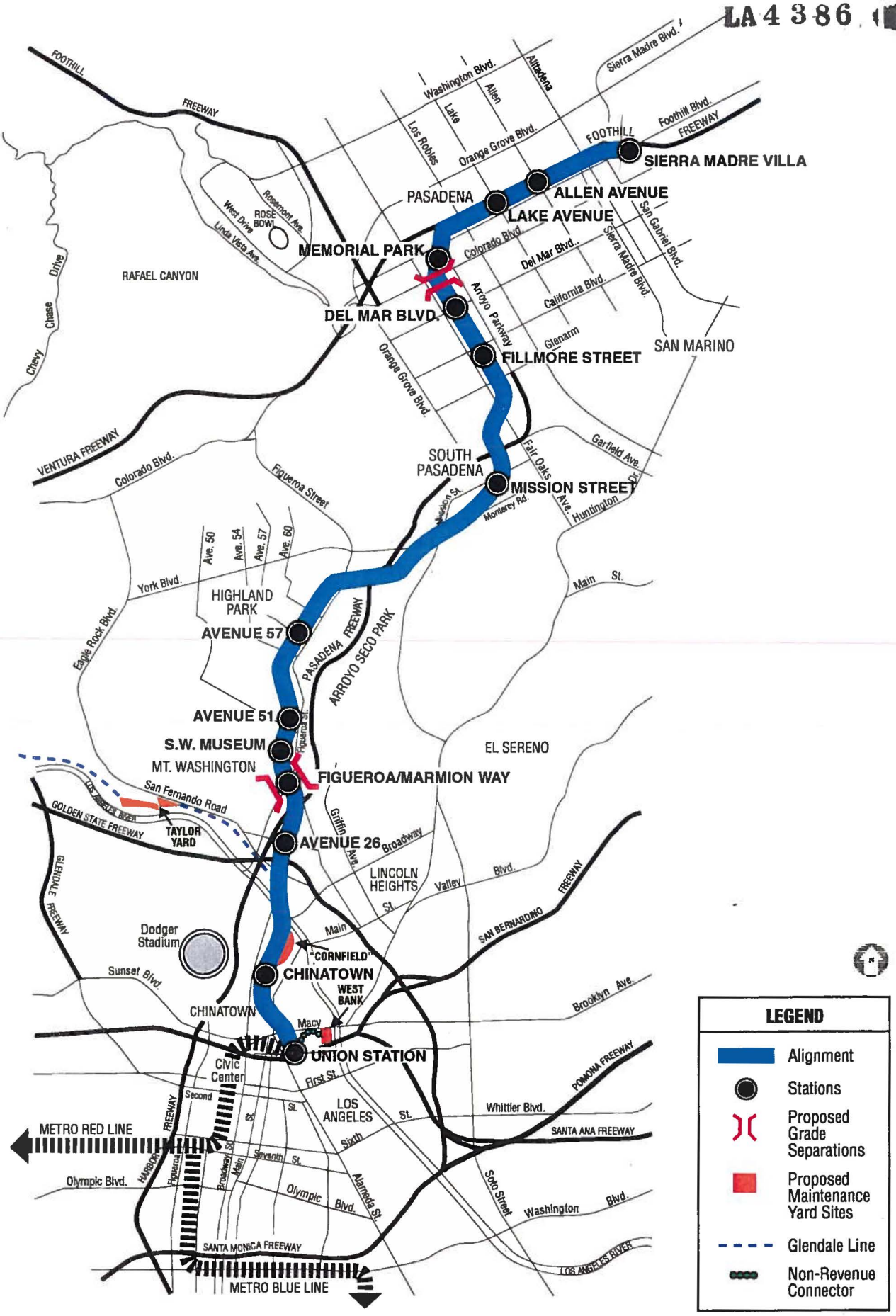
PASADENA-LOS ANGELES LIGHT RAIL TRANSIT PROJECT

DECEMBER 1993

LA-04386

PASADENA LIGHT RAIL TRANSIT PROJECT

LA 4386



RCC-291/7-92

CULTURAL RESOURCES OVERVIEW
METROPOLITAN TRANSPORTATION AUTHORITY
PASADENA-LOS ANGELES LIGHT RAIL TRANSIT PROJECT

ATCHISON, TOPEKA & SANTA FE RAILROAD HISTORIC CONTEXT

The Atchison, Topeka and Santa Fe Railroad (AT&SFRR) followed the 35th Parallel Route across the United States. This route was promoted by Cyrus K. Holliday. In 1863, the AT&SFRR received a Congressional land grant for 3 million acres in alternate sections in Kansas. By 1872, the line had reached Colorado. Over a combination of its own tracks and leased tracks, the AT&SFRR had reached Los Angeles via Needles and Yuma by 1887. At that time, the company had 7,100 miles of track from Kansas City to Los Angeles (Morris and Morris 1976).

Local boosters wanted a rail link between Pasadena and Los Angeles but Pasadena was too small to attract any of the railroad giants. In 1883, James F. Crank headed a group of investors who backed construction of the Los Angeles & San Gabriel Valley Railroad (LA&SGV). Work on the line began late in 1884, but was delayed by the bankruptcy of the contractor in January 1885. By July, only 3,500 feet of track had been laid, but one of two major bridges was completed. The Southern Pacific Railroad further delayed construction by deliberately losing or misdirecting equipment shipments for the LA&SGV Railroad. Despite the obstacles, the LA&SGV persevered and on September 16, 1885, the first passenger train traveled over its line from Los Angeles and arrived in Pasadena (Scheid 1986).

The "Big Four" railroad magnates, Collis P. Huntington, Leland Stanford, Charles Crocker and Mark Hopkins, owned controlling stock in both the Central Pacific and Southern Pacific Railroads. By 1884, all of the central Pacific, Southern Pacific and independent rail lines in which the "Big Four" held an interest had been consolidated under the name of the Southern Pacific (SP). The Southern Pacific worked to perpetuate its virtual monopoly over California railroads and waged fierce battles with any and all competitors. Thus the SP's actions to delay and discourage construction of the LA&SGV Railroad, a very small segment of the total railroad track mileage in the state (Duke 1963; Bryant 1974; Daggett 1966; Mercer 1982).

The AT&SFRR was, however, a major threat to the Big Four's monopoly and the SP engaged in a number of tactics to prevent the AT&SFRR's entry into California. The AT&SFRR's line that reached Los Angeles from Needles at the California-Arizona border was achieved by acquisition and or leasing of several lines in addition to some construction. The Atlantic & Pacific Railroad line from Needles to Barstow was actually built by the Southern Pacific and sold to the Atlantic & Pacific Railroad in 1884 as a result of financial reverses. The segment from Barstow was started by the California Southern Railroad Company, a syndicate formed in 1881 by the Citizens Railroad Committee of San Diego, but high construction costs, legal obstacles and a flood forced the firm to default on its loans in 1884. The AT&SFRR acquired the California Southern

and finished the line. It undertook construction from San Bernardino to Los Angeles and completed the line at Pasadena with acquisition of the LA&SGV Railroad (Duke 1963; Bryant 1974; Marshall 1945).

While railroad construction in the East had followed the growth of business and population, railroad construction in the West frequently preceded settlement. A majority of the members of Congress and the public believed that the Pacific Railway's construction would never occur or would be greatly delayed without government intervention (Mercer 1982). Financing was the initial stumbling-block and continued to be a problem that plagued the western railroads (Mercer 1982). Land grants enabled the railroads to use the land as security for loans but much of the land was semiarid or broken mountain land and of little value (Bryant 1974). Various land grant railroads worked tirelessly to promote the sale of their real estate holdings in the West, but sales failed to generate the necessary expenses to pay off bonds and loans made to complete their lines. The rush to complete the greatest distance in the shortest time possible led to much substandard construction that had to be redone within a generation. The Panic of 1893 cut off further credit and railroads collapsed. The AT&SFRR went bankrupt in 1893 and was under receivership for two years (Morris and Morris 1976; Duke and Kistler 1963).

Arroyo Seco Bridge

The Arroyo Seco bridge (also known as the Arroyo Seco viaduct) is a 712-foot deck-steel plate girder bridge and was completed in 1894 by the AT&SFRR. Construction was probably initiated prior to the firm's bankruptcy. This was one of the last structures erected by the AT&SFRR prior to its economic collapse (Duke and Kistler 1963). The bridge was reinforced in 1917 and again in 1923. The Arroyo Seco bridge is the oldest steel bridge in the project area (GREEN 1991).

Los Angeles River Bridge

The Atchison, Topeka and Santa Fe Railroad declared bankruptcy in 1893 and went into receivership. In 1895, a new entity, the Atchison, Topeka and Santa Fe Railway (AT&SF), took over the remaining properties of the Atchison, Topeka & Santa Fe Railroad. Edward Payson Ripley assumed leadership of the AT&SF and during the next 24 years, completely revamped and rebuilt the company's entire 8,118 miles of track stretching from Kansas City to the West Coast (Duke and Kistler 1963).

The Los Angeles River Bridge was built in 1901 as part of this overall reworking of the railroad. The Los Angeles River Bridge was designed by the American Bridge Company. It is a Pratt truss bridge with pin connections and is typical of many bridges built for that time. The 1901 structure was designed as a single-track bridge but it was upgraded and raised in 1941 when the river channel was lined with concrete. The bridge is still being used for AT&SF Railway freight traffic.

ATCHISON, TOPEKA & SANTA FE RAILWAY BRIDGE OVER THE ARROYO SECO

Location

The AT&SF Railway bridge over the Arroyo Seco was constructed in 1894. The bridge, located south of the York Street overcrossing in Highland Park/South Pasadena (Figure 1), is a high level steel girder structure on steel tower bents. Spanning the Pasadena Freeway, the Arroyo Seco and Arroyo Seco Park, the bridge is visually dramatic as well as functional. In addition, the bridge is historically and architecturally significant: it has been designated as a Cultural Heritage Monument by the City of Los Angeles.

Resource Description

Built about 1894, the bridge is possibly the oldest high level railroad bridge still in use in Southern California. It is 710 feet long and about 65 feet above the Arroyo Seco.

The Arroyo Seco bridge carries a single AT&SF track across a wide canyon. In the canyon, the creek bed is in a main concrete channel; the remainder of the canyon bottom is a flood plain. Funding was granted for a number of public project improvements under the Works Project Administration (WPA). The projects included construction of the first freeway in the Arroyo Seco (now known as the 110 or the Pasadena Freeway), the Arroyo Seco Creek, and development of the remainder of the canyon bottom as public park lands.

Historic Context

The neighborhoods along the Arroyo Seco are characterized by bridges and winding streets because the northeastern boundary of Los Angeles follows the meandering arroyo. Most of the bridges are for automobile traffic; some are pedestrian. Many of the bridges are historic because bridges were a necessity for transportation and commerce from the earliest years of the city. The AT&SF bridge over the Arroyo Seco is one of the more unusual bridges.

Photographs of the Arroyo Seco Bridge are presented in Appendix A. The bridge itself is bilaterally symmetrical, except that the length of the final span on each side is adjusted for grade conditions. The main spans are 80 feet in length. The final, westerly span is 60 feet long. Across the towers are smaller girders spanning the 30 feet between tower columns. Vertical supports are alternating bents and towers, with a tower as the central support and a bent as the final vertical member at each end.

The AT&SF Bridge is built of steel with a concrete foundation, which is typical for railroad bridges. The foundations for the bents consist of a single spread footing for both columns measuring 7 feet 4 inches by 7 feet 0 inches with a 3-foot 9-inch radius semicircle at one end. The foundation is rounded in plan on the upstream side; before the existing flood control channel was built, the arroyo served as a flood plain.

Figure 1 Map of Pasadena-Los Angeles Light Rail Transit Project (on following page)

On top of each foundation is a bearing block for the columns. The blocks appear to be worked stone, but may be cast stone (concrete). This apparently-ornamental treatment in the bottom of a canyon is unusual. The stonework may have been added as part of the WPA work, but no record was found in AT&SF's files. There is no information on the attachment of the stone to the footings nor is it known if the tower anchor bolts extend through the stone and into the foundation. There is an abutment at each end of the bridge on the canyon wall.

Construction of the superstructure represents the types of steel members that were available and deliverable to the west coast in the mid 1890's. Steel angles, plates, round rods and small flat bars were used to create structural elements. Rivets were used to build up the various structural components.

Columns for both the towers and bents are lattice columns with riveted plates and angles rather than rolled shapes. Spacing between water columns is 30 feet in the longitudinal direction at the base. In the transverse direction, the columns are battered so that they are spaced 8 feet apart at the top and 20 feet apart at the base.

The bridge was structurally upgraded in 1917 and 1923. The 1923 upgrade was to support the heavier weight of AT&SF's 3800 class locomotives (Nos. 3800 to 3940). These steam locomotives were the largest built at that time, consisting of a 2-10-2 wheel configuration (counting the total of left and right wheels: two small wheels under the cowcatcher, ten large drive wheels, and two small wheels under the cab). The 3800's were built by Baldwin between 1919 and 1927. They were designed for fast passenger and heavy freight service, and were the prime freight hauling locomotive in southern California until the advent of the diesel locomotive. This structural upgrade was about equivalent to a Cooper's E-72 loading, the heavy railroad standard at that time.

The towers and bents were originally built with tension rods as bracings. In the 1923 upgrade, bracing was changed to channel shaped built-up angles with batten plates.

The track is carried on built-up plate girders, spaced 8 feet on center with three different span lengths. Spans are 30 feet over each tower and 80 between each bent/tower pair. The final span at the west end of the bridge is a 60-foot long beam adjusted to meet the slope.

The 80-foot long girders consist of steel plates 96-inches deep and one-half inch thick serving as the web. The bottom and top flanges consist of plates and angles, originally 2L-5x5x1/2 with three 12-inch wide and 1/2-inch thick plates at mid-span and modified in 1923 with the addition of 2L-6x6x7/8. The 60-foot span girder is 72 inches deep. Both the original and added top and bottom flanges are 2L-5x3-1/2x5/8 with two 10-1/2-inch wide and 5/8-inch thick plates at mid-span. The 30-foot long girder that spans between the legs of the towers has a web that is 42 inches deep and 3/8 inches thick. The top and bottom flanges are constructed with 2L-4x3x3/8 original and 2L-4x3x3/8 for the added flanges, with two 10-inch wide and 3/8-inch thick plates at mid-span. In addition, the cross bracing between girders was upgraded in 1923.

On top of the girders is a wood deck to carry the rails. The deck is constructed of eight-by eight-inch solid timbers. The ties and ballast with the rails lie on top of the deck.

In 1963, an inspection walkway was added along the lower flange of the girders. The legs of the towers and bents were observed to be battered and the lateral bracings were at an angle. As a result, water had accumulated at the interior corners of the members causing rust. The degree of rusting did not appear excessive and was not to the point of requiring replacement. Maintenance painting by AT&SF personnel has kept deterioration to a minimum.

Activities to Date

An Environmental Impact Report (EIR) was certified in 1990 for the Pasadena to Los Angeles Light Rail Transit (LRT) Project that would potentially replace the AT&SF line with two light rail tracks (MTA 1990). This would require the widening of the Arroyo Seco Bridge to accommodate the two-track system. The bridge was identified in the EIR as a structure of potentially historic value. The Arroyo Seco bridge was also identified in the Draft Final Report of the Structural Evaluation of the AT&SF Railroad Bridge over the Arroyo Seco, Los Angeles (GREEN 1991) as potentially historic.

Proposed Actions

In order to develop an approach that would be environmentally acceptable, architectural design criteria were developed and are discussed below (GREEN 1991). These criteria provide broad guidelines for the structural work necessary for light rail reuse of the structure.

One of the significant aspects of the character of the bridge is its overall profile view. It was recommended that the bridge rehabilitation retain the bridge profile as much as possible.

One of the major aesthetic characteristics of the bridge is the rhythm of the existing structural members. The bridge is bilaterally symmetrical, with a simple alternating rhythm of towers and bents.

It was recommended that new work on the bridge reflect the rhythm of the existing structural elements. In keeping with traditional railroad construction of the period, the towers and bents are built up from plates and angles rather than using the wide-flange shapes that are more common today. New materials and elements were recommended to be the same as the original materials. If strengthening is necessary, angles and plates were recommended instead of WF shapes.

It was recommended that any modifications made to the Arroyo Seco bridge maintain present visual quality at the column bases because the only close-up views of the bridge

available to the general public are views of the column bases from the ground up to a maximum of about six feet above grade.

Cast or natural stone at the column bases provides textural contrast to the steel of the bridge and provides a transition between the manufactured bridge structure and the rough stone of the arroyo. It was recommended that the existing cast or worked stone be retained.

Re-use of secondary historic fabric where feasible is consistent with the intent of the Secretary of the Interior's Standards for Historic Preservation (1992). Therefore, secondary fabric such as the existing safety railing was recommended to be reused if possible.

Subsequent to the GREEN report (1991), further unpublished studies were conducted on the Arroyo Seco bridge structural evaluation. Melvyn Green & Associates, Inc. and Rail Construction Corporation (RCC) then met with the Highland Park Historical Society to present the concepts. The design was also presented to the Los Angeles Cultural Heritage Commission and approved on February 17, 1993. The RCC agreed to complete a documentation report consisting of engineering records and photographs. The final design was then developed in accordance with the standards established at the beginning of the project.

Review of the rehabilitation proposal shows that, although widening of the bridge is necessary for the needed two tracks, the major character-defining elements would be preserved. In the new design, the bridge would have three girders in place of the two existing girders. The foundation would be augmented with new cast-in-drilled-hole piles to prevent overturning. The existing granite blocks of the foundation would remain. The towers and bents would be taken down and rebuilt, with the same materials to the extent possible, with some strengthening would be added. At the top of each tower, new cap beams would be constructed according to the width of the new deck. The cap beams would support the three new girders, which would reflect the existing rhythm and depth of stiffeners. The new concrete deck would have a relatively shallow profile. While the new railing must meet current criteria for height and spacing of members, it will provide a similar silhouette as the existing bridge.

The rehabilitation is in accordance with the Secretary of the Interior's Standards for Treatment of Historic Properties, as contained in the Standard for Rehabilitation (Secretary of the Interior 1992). This standard states that, "New additions, exterior alterations, or related new construction shall not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and shall be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment."

ATCHISON, TOPEKA & SANTA FE RAILWAY BRIDGE OVER THE LOS ANGELES RIVER

The AT&SF Los Angeles River bridge is located east of Elysian Park and north of the Broadway Street/Pasadena Avenue River Crossing. It is part of the rail connection between Chinatown and Mt. Washington in Los Angeles (Figure 1).

Bridge Description

Appendix B presents photographs of the AT&SF Bridge over the Los Angeles River. The date of bridge construction is 1901. The bridge is made of steel with a concrete foundation. It consists of a triple span Pratt truss and three well deck girder spans. The tracks cross the river in a southwest to northeast direction, curving slightly on the western embankment. The approach ramps begin near Baker St. on the west and Humboldt St. on the east. The western embankment is largely industrial, while the eastern embankment is an industrial and residential mix with some open land.

Two riveted well deck girder spans lead to the mainspan on the west. One of the spans was replaced 11 years after installation of the original units. As a result, the girder units vary slightly in construction, and they are offset to accommodate the curving approach ramp. On the east, a single well deck girder span leads to the mainspan. It is identical in construction to the earlier of the two units on the west. The triple mainspan Pratt truss rests on large concrete piers in the channel, and on concrete piers and footings to the east and west. The truss is slightly modified, reflecting the angled crossing of the river channel. The overall length of the structure is 831 feet 8 inches. The structure carries a sing-track roadbed. It is in good condition, and is unaltered with the exception of the replacement of one of the girder spans by various flood control/water diversion improvements to the river channel piers. The bridge does, therefore, retain its architectural, structural, and design integrity, but does not possess a high artistic value (COE 1987). The structure has however, been altered by the addition of a new girder span and by the alterations to the river channel piers.

Historic Context

The first major period of Los Angeles bridge building is associated with the late 1870s arrival, and the 1880s growth and development of the railroads. None of the project area bridges dates from this early period of construction. This is largely due to the fact that the original bridges were replaced either due to increased traffic loads and/or damage to the original unit. Many of the Los Angeles area railroad bridges were destroyed in the Big Flood in March of 1938. Every railroad bridge into and out of Los Angeles was, in fact, damaged to some degree in this flood, and all of the project area bridge piers were rebuilt as part of control/water diversion improvements to the river channel.

Like many railroad bridges of the period, the AT&SF Los Angeles River bridge was not custom designed. Rather, it was fabricated from mass produced components by the American Bridge Company, one of the major American suppliers of industrial type

American Bridge Company, one of the major American suppliers of industrial type bridges. One of the western girder spans was replaced in 1941, probably due to accidental damage to the original. At this time it was probably also lengthened. The bridge has the distinction of being one of the least damaged Los Angeles railroad bridges in the 1938 flood, although improvements appear to have been made to the river channel immediately thereafter. The bridge is an excellent example of railroad bridge construction and it retains a high degree of integrity. However, as a result of its relatively recent date of construction and the fact that it has no unique engineering or design features, this bridge does not appear to be potentially eligible to the National Register of Historic Places (COE 1987).

Activities to Date

No significant activities regarding the Los Angeles River bridge have been identified to date.

Proposed Actions

The two-track system proposed for the Pasadena to Los Angeles LRT Project requires a width of 26 feet, including a safety walkway. It is not feasible to widen the existing structure to accommodate the two-track system.

This portion of downtown Los Angeles and the approach to the Los Angeles Union Passenger Terminal has a variety of tracks with very tight turns. Typical speeds in the area are limited to 25 miles per hour. The bridge does not meet the alignment criteria necessary for the speeds of the light rail line.

It is concluded that the Los Angeles River Bridge was not feasible for use by the LRT Project and it has proposed to replace the bridge with one that will meet the needs of the project. Furthermore, the Los Angeles River bridge is not eligible to the National Register of Historic Places due to its design/construction type, lack of unique features, or alterations to the original structure (COE 1987).

OLD TOWN PASADENA NATIONAL REGISTER HISTORIC DISTRICT

Location

The Old Town Pasadena National Register Historic Districcolony's purchasing agent, formed the San Gabriel Orange Grove Association to precede with settlement of the former Rancho San Pasqual (Rolle 1969; Scheid 1986).

The land owned by Griffin and Wilson was originally Rancho San Pasqual. Although provisional grants for this land was made in 1835 and two others were approved in 1840, the land grant holders forfeited their claims because they failed to cultivate the land and utilize it for grazing. Rancho San Pasqual, comprised of 13,500 acres, was given as a land grant in 1843 to Manuel Garfias. After the acquisition of California by the United States as

church and a convent are described in the Revised Draft EIR (MTA 1989); an additional four structures were identified in the supplemental EIR (MTA 1992). However, it is unclear which of these 43 buildings are included in the National Register Historic District for Old Town Pasadena. At least twelve buildings are eligible as part of the National Register District (MTA 1992). Seven structures are identified as potentially eligible for the National Register of Historic Places (MTA 1989). Three structures are listed as historically significant by the City of Pasadena (MTA 1992). Twenty-one buildings have not been evaluated for importance under CEQA or NRHP eligibility according to the Revised Draft EIR (MTA 1989) and Supplemental EIR (MTA 1992).

Historic Context

Successful development of towns in the trans-Mississippi West was primarily a result of railroad company promotion. The railroads' nation-wide publicity combined with local boosterism and adequate water supplies provided by irrigation and canal projects brought rapid development of the western United States. The segment of the AT&SF's railroad line between Pasadena and Los Angeles parallels the broad pattern of development throughout the West resulting from the synergetic effect of town promoters, local boosters, and railroad companies. The majority of new towns that sprang up in Los Angeles County and the adjoining regions in southern California, originated as speculative ventures in townsite promotion. Anaheim, Riverside, Colton, Pomona, Pasadena, and Lompoc were communities that began as towns planned for settlers who banded together to form colonizing organizations (Reps 1979).

In 1867, the original town promoters, Dr. J. S. Griffin and B. D. Wilson, built the Wilson Ditch from the Arroyo Seco River to their mesa lands and a 3,000,000-gallon reservoir to provide a dependable source for irrigation. Late in 1872, Griffin agreed to sell his holdings, 4,000 acres, to a group called the California Colony of Indiana. The Panic of 1873 reversed the fortunes of the original Hoosier colonists. D. M. Berry, the colony's purchasing agent, formed the San Gabriel Orange Grove Association to precede with settlement of the former Rancho San Pasqual (Rolle 1969; Scheid 1986).

The land owned by Griffin and Wilson was originally Rancho San Pasqual. Although provisional grants for this land was made in 1835 and two others were approved in 1840, the land grant holders forfeited their claims because they failed to cultivate the land and utilize it for grazing. Rancho San Pasqual, comprised of 13,500 acres, was given as a land grant in 1843 to Manuel Garfias. After the acquisition of California by the United States as part of the Mexican Cession, Garfias' claim was submitted to the Board of Land Commissioners in 1852 and approved in 1854. The U.S. patent was not issued for 9 more years. Deeply in debt, Garfias sold his land in January, 1859, to Benjamin D. Wilson for $1,800.00. In May, 1860, Wilson sold Dr. John S. Griffin a half interest in Rancho San Pasqual for $4,000.00 (Robinson 1939).

The majority of Berry's new stockholders in the San Gabriel Orange Grove Association were also from Indiana. The first colonists arrived on January 27, 1874 and Orange Grove Avenue was the site of the first settlement (Robinson 1939). Once the town was

established, local boosters built a small segment of railroad, the Los Angeles and San Gabriel Valley Railroad (LA&SGV), to link Pasadena with Los Angeles (Scheid 1986). The "City of the Angels" was a major trade and cultural center and an outlet for worldwide shipping. The AT&SFRR acquired the LA&SGV, thereby completing its line from Chicago to Los Angeles. The rate war with the Southern Pacific and the attendant publicity brought thousands of settlers to Southern California (Bean and Rawls 1988). The railroads' national advertising campaign created a widely-held romantic image of Southern California as an incomparable attraction for tourists, health seekers, and farmers (Caughey and Hundley 1982). Railroad companies were the chief promoters of the West. They not only gave impetus to settlement but facilitated the migration of great numbers of settlers who arrived by train rather than the covered wagon of earlier generations (Winther 1974).

The first significant growth in southern California occurred between 1868 and 1876, spurred by the region's mild climate and rich agricultural lands. This modest influx of population was a result of the spread of the citrus industry and the promotion of the area for its health benefits, purported to be especially advantageous for tuberculosis sufferers (Bean and Rawls 1988). The areas' advantages were widely touted by the railroads, which stood to profit from increased traffic on their lines and from the sale of railroad grant lands (Winther 1974).

By the early 1880s, Pasadena was a quiet agricultural village of orange groves with a population of less than 400, the majority classifying themselves as "orchardists" for the Census. The advent of the railroad and the land speculation boom of 1886 to 1888, dramatically changed Pasadena into a busy resort town with sophisticated hotels, brick commercial buildings, coast-to-coast rail connections, trolley lines, and elaborate mansions. At the height of the boom there were an estimated 12,000 to 15,000 inhabits. By 1890, the population had settled at about 5,000 (Scheid 1986; Rolle 1969).

The segment of the AT&SFRR line between Los Angeles and Pasadena played a major part in the area's local development as well as a key role in the successful completion of the AT&SF direct route from Los Angeles to Chicago and the East. In 1883, James F. Crank headed a group of investors who backed construction of the Los Angeles & San Gabriel Valley Railroad. Work on the LA&SGV line began late in 1884, but was delayed by the bankruptcy of the contractor in January 1885. By July 1885, only 3,500 feet of track had been laid, but one of two major bridges was completed. The LA&SGV pressed on, and on September 16, 1885, the first passenger train traveled over its line from Los Angeles and arrived in Pasadena (Scheid 1986).

Through leases, purchase and its own construction, the AT&SFRR reached Los Angeles from Needles at the California-Arizona border in 1885. The AT&SFRR leased the LA&SGV tracks between 1885 and 1887, when it purchased the line outright (Scheid 1986).

A number of new towns were built in response to the "health rush:" Pasadena, Riverside, Sierra Madre, Alta Dena, Santa Monica, Palm Springs, Ojai, and Nordhoff in the 1870s.

They competed with the older, established towns of Los Angeles, San Diego, Santa Barbara and San Bernardino. The health rush of the 1870s was fueled by railroad promotion and real estate speculation that ran rampant in the 1880s. While the real estate bubble burst in the late 1880s, the health seekers continued to arrive in California through 1900. Approximately one-fourth of the region's population of 325,000 in 1900 first came to the state as health seekers (Caughey and Hundley 1982).

Completion of the AT&SFRR to Los Angeles in 1885 ignited a rate war with the Southern Pacific Railroad. Rates as low as $1.00 for a ticket from Kansas City to Los Angeles and extensive publicity of the superior potential of California's agricultural lands, its healthful climate, and its unusual tourist attractions brought a real estate boom that climaxed in 1887 (Bean 1988). Railroad colonization companies, such as the Southern Pacific Colonization Agency and the Atchison, Topeka & Santa Fe's Pacific Land Improvement Company widely promoted Southern California to find buyers for their lands and to create customers for their transportation services. These railroad subsidiaries sung the praises of the West, painting it as a utopia. Horace Greeley's advice captured the spirit of the times: "Young! Poor men! Widows! Resolve to have a home of your own! If you are able to buy and pay for one in the East, very well; if not, make one in the broad and fertile West!" (*New York Daily Tribune*, 21 March 1862).

By 1886, five trains a day sped through Pasadena enroute to Los Angeles. Thousands of persons jammed these special excursion trains on the way West. Many of them were skilled land developers, speculators and promoters who recognized the increasing interest in California and an opportunity to profit thereby. Fifty-three real estate agencies in Pasadena worked tirelessly to sell land to speculators and settlers alike. The town of Pasadena was incorporated in 1886 and the celebrated Raymond Hotel opened, a 400-room luxury hotel (Rolle 1969; Scheid 1986; Reps 1979). Pasadena, at the western entrance of the San Gabriel Valley, rivaled Los Angeles' frenzy of speculative activity. During 1886 and 1887, 433 separate subdivisions or additions were recorded for Pasadena, only 20 percent less than for Los Angeles (Reps 1979).

The most significant impetus for a boom in Pasadena was the school house auction which took place in March 1886. The school occupied five valuable acres of land in the center of town fronting on Colorado and Fair Oaks. The land had been donated by Benjamin Wilson in 1876. The directors of the Pasadena School District received permission to move the school to another location and subdivide the property into 35 lots. These sold for amounts ranging from $612.00 to $3,700.00 and raised $44,772.00 for the school district. The school house was moved to a lot south of Colorado Street on the east side of Raymond Avenue (Scheid 1986). A building boom followed and by 1888 when the speculative frenzy subsided, Colorado Street was lined on both sides, to the east and west of Fair Oaks, with two- and three-story structures. These were substantial buildings of elaborate design, many of them brick. Fair Oaks Avenue and Raymond Avenue to the north and south of Colorado also had a number of large brick buildings. The business district continued to grow in the 1890s.

Activities to Date

The Old Town Pasadena Historic District was formally listed on the National Register in 1983. This District is eligible under criteria "a" (association with events that have made a significant contribution to the broad patterns of our history) and "c" (embodiment of the distinctive characteristics or a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction) (National Register of Historic Places 1991:59). The thirty-nine buildings listed in the revised draft EIR (MTA 1989) were identified by the City of Pasadena as historic resources or structures. It is unclear whether these structures are contributing or noncontributing elements to the National Register District, or whether these buildings are located beyond the district boundaries.

Proposed Actions

No significant adverse impacts were anticipated to occur in the Old Town Pasadena Historic District as a result of the original proposed light rail project (MTA 1989). However, in the Supplemental EIR (MTA 1992), a Colorado Boulevard upgrade was evaluated. This alternative is located adjacent to the Old Town Pasadena Historic District. Because most of the buildings were constructed of unreinforced masonry in the 1800s, vibration from construction and operation of the light rail system would have an adverse effect on the structural integrity of the buildings (MTA 1992). Mitigation measures adopted included engineering studies, monitoring programs and architectural design review (MTA 1992).

SOUTH PASADENA HISTORIC DISTRICT

Location

The South Pasadena National Register Historic District is bounded by Mission and El Centro Streets and Fairview and Meridian Avenues (National Register of Historic Places 1991).

Resource Description

Four structures consisting of the Meridian Ironworks and Watering Trough, the Mission Arroyo Hotel and the Century House are described in the Revised Draft EIR (MTA 1989). However, it is unclear whether any of these buildings are included in the National Register Historic District for South Pasadena or are simply located in the vicinity. All four structures are listed as historically significant by the City of South Pasadena (MTA 1989).

Historic Context

See Historic Context for Old Town Pasadena, above.

Activities to Date

The South Pasadena Historic District was formally listed on the National Register in 1982 (National Register of Historic Places 1991:60). This district is eligible under criterion "a" (association with events that have made a significant contribution to the broad patterns of our history) (National Register of Historic Places 1991:60). The four buildings listed in the Revised Draft EIR (MTA 1989) were identified by the City of South Pasadena as historic resources or structures. It is unclear whether these structures are contributing or noncontributing elements to the National Register District, or whether these buildings are located beyond the district boundaries.

Proposed Actions

No significant adverse impacts were anticipated to occur on historic resources in the South Pasadena area as a result of the proposed light rail project (MTA 1989).

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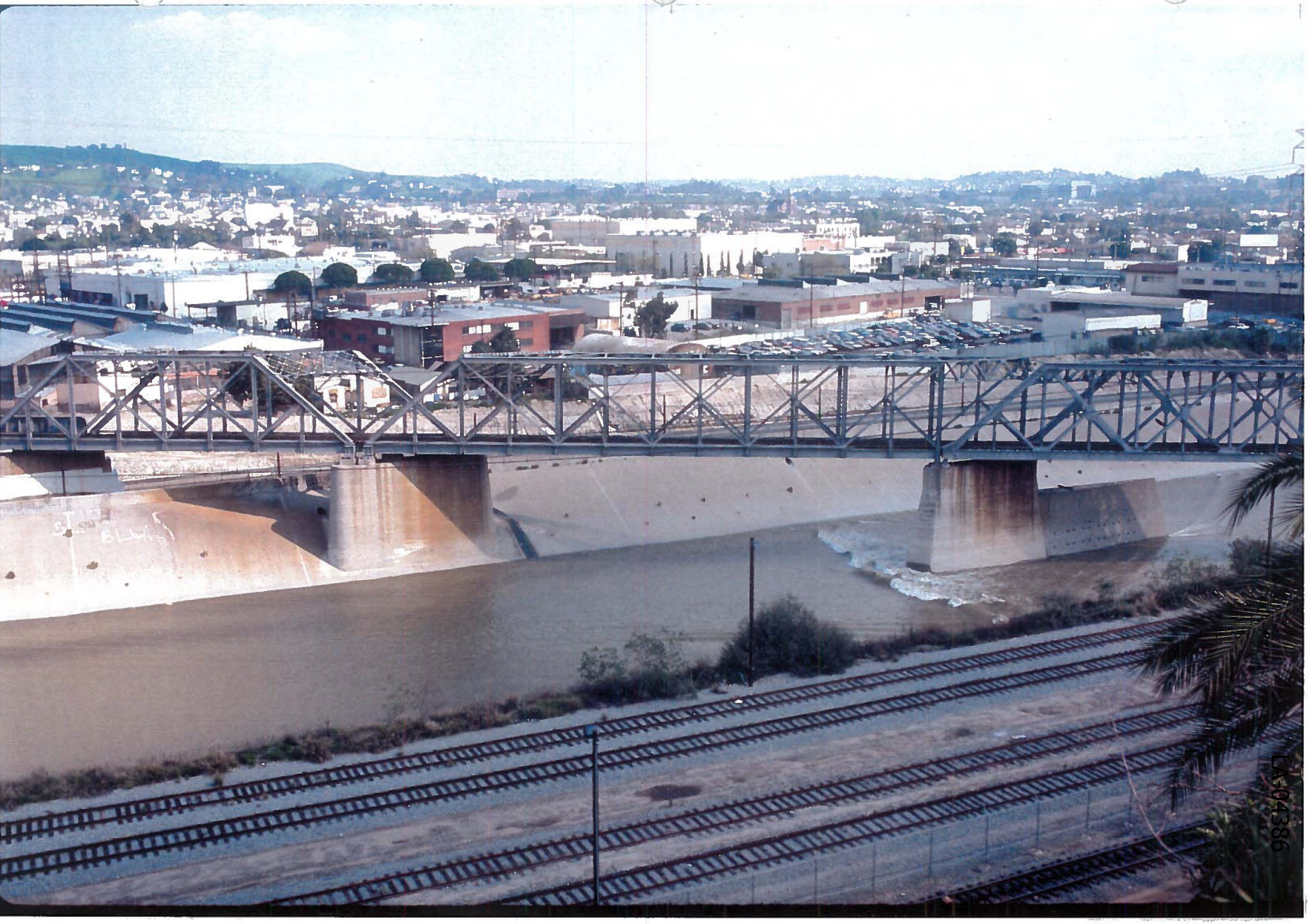
APPENDIX A

PHOTOGRAPHS OF AT&SF ARROYO SECO BRIDGE


LA-04386



LA-04386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APPENDIX B

PHOTOGRAPHS OF AT&SF LOS ANGELES RIVER BRIDGE

APPENDIX G: RESUMES

HISTORIC RESOURCES GROUP



PAUL D. TRAVIS, AICP
MANAGING PRINCIPAL

Years of Experience: 15

Education

Master of Arts in Urban Planning, University of California, Los Angeles, 2006

Bachelor of Fine Arts, Printmaking, San Jose State University, San Jose, 1985

Speaking Engagements

California Preservation Foundation

- Historic Resources and the California Environmental Quality Act
- Historic Resources Surveys
- Preservation Planning

American Planning Association, California Chapter

- Preservation Planning

Professional Affiliations

American Institute of Certified Planners, Member

American Planning Association, Urban Design & Preservation Division, Member

American Planning Association, Los Angeles Chapter, Member

California Preservation Foundation, Guest Speaker, Workshop Leader

National Trust for Historic Preservation, Member

Experience Profile

Paul Travis has been with HRG since 2006 and specializes in master planning, CEQA, NEPA and Section 106 environmental review, and historic resources assessment.

At HRG, Paul manages planning-related projects with a focus on large, multi-property sites including college campuses, historic downtowns, neighborhoods and districts, industrial sites, motion picture studios, and military bases.

Paul has drafted preservation plans for the University of Southern California; NBC Universal Studios, Hollywood; and Los Angeles International Airport. He has participated in the development of community plans or specific plans for Paso Robles, Fresno, and Whittier; and has been involved in the master planning process for Loyola Marymount University, Occidental College, Mount St. Mary's College, Fox Studios, the Alameda Naval Station, and the Downey NASA site. Recent survey experience includes historic resource surveys for the cities of Los Angeles, Ventura, Glendale, Paso Robles, San Diego, and Fresno.

Prior to working at HRG, Paul worked as a research assistant at the Lewis Center for Regional Policy Studies performing academic research for study of transit-oriented development along the Pasadena Gold Line light rail system. Responsibilities include gathering and analysis of ridership data and adjacent development activity, and field observation of conditions surrounding transit stops.

Paul Travis meets the *Secretary of the Interior's Professional Qualification Standards* in Historic Preservation Planning and History.

Selected Projects

Fresno Fulton Corridor Specific Plan and CEQA, Fresno
Fox Studios Master Plan, Century City
Gamble House Cultural Landscape Report, Pasadena
LAX Historic Assessments, Environmental Review, Preservation Plan
NBC Universal Evolution Plan, Universal City
Sunset Bronson Studios Master Planning, Hollywood
Sunset Gower Studios Master Planning, Hollywood
SurveyLA Citywide Survey, Los Angeles
Thacher School Campus Survey, CEQA & Historic Designation, Ojai

HISTORIC RESOURCES GROUP



KARI MICHELE FOWLER
SENIOR PRESERVATION PLANNER

Years of Experience: 20

Education

Master of Arts in Urban Planning, University of California, Los Angeles, 2002

Bachelor of Arts in English, Magna cum Laude Latin Honors, University of California, Los Angeles, 1996

Professional Affiliations

American Planning Association, Urban Design & Preservation Division

American Planning Association, Los Angeles Chapter

Los Angeles Conservancy

California Preservation Foundation

National Trust for Historic Preservation

DOCOMOMO US

Speaking Engagements

California Preservation Foundation

- Historic Resource Surveys
- Evaluating Non-building Resources

Getty Conservation Institute

- SurveyLA

University of Southern California

- Lecturer, Heritage Conservation Summer Course, 2014-2016

Awards

Los Angeles Conservancy

- Asian Americans in Los Angeles MPD, 2019
- Chairman's Award, SurveyLA, 2017

Vernacular Architecture Forum

- Buchanan Award, 2019

American Planning Association

Experience Profile

Kari has been working in historic preservation planning since interning with HRG during her studies at UCLA in 2001. She has been working in the field and with the firm for 20 years.

At Historic Resources Group, Kari's responsibilities include supervising and conducting historic resources surveys, including developing survey methodologies, conducting fieldwork, data management and analysis, and historical research. She specializes in historic context statements and generating environmental documents relating to historic resources, including CEQA, NEPA, and Section 106 review. Kari has evaluated and documented historic resources at the local, state, and national levels, including the preparation of local landmark applications, nominations and determinations of eligibility for the California and National Registers, and National Historic Landmark nominations.

Kari has managed several large-scale historic resources surveys throughout California, including in the cities of Ventura, San Clemente, Paso Robles, Temple City, Santa Monica, and San Diego. Most notably, she served as HRG's Project Manager for SurveyLA, Los Angeles' citywide historic resources survey, from 2010 to 2018. As part of this project, she developed a field survey and data collection methodology that allowed for large and complex geographical areas to be surveyed effectively and efficiently. She also drafted the Multi-Family Residential Sub-Context for the SurveyLA Historic Context Statement. Her work on historic resources surveys and historic context statements has won awards from the Los Angeles Conservancy, the California Preservation Foundation, the Vernacular Architecture Forum, and the American Planning Association.

Kari Michele Fowler meets the *Secretary of the Interior's Professional Qualifications Standards* in Historic Preservation Planning and History.

Selected Projects

SurveyLA City of Los Angeles Citywide Survey
SurveyLA Multi-Family Residential Historic Sub-Context Statement
SurveyLA Chinese American Historic Context Statement
Eames House National Historic Landmark Nomination
Filipino Christian Church National Register Nomination
Hollywood Forever Cemetery Historical Resources Technical Report
Lincoln High School Historic Assessment
Los Angeles Zoo Historical Resources Technical Report
Reseda Theater Historic Assessment
Santa Monica High School Historical Resources Technical Report
City of Santa Monica Citywide Survey Update
City of Ventura Downtown Historic Context & Survey Update

HISTORIC RESOURCES GROUP



ROBBY ARANGUREN
PLANNING ASSOCIATE
GIS SPECIALIST

Years of Experience: 11

Education

Bachelor of Arts in Interdisciplinary Studies: Architecture, Urban Planning, and Business (Real Estate)
University of Texas, Arlington

Honors and Awards

California Preservation Foundation

- Preservation Design Award: *Wallis Annenberg Center for the Performing Arts, 2014*
- Preservation Design Award: *Lincoln Place Apartments, 2015*

Professional Affiliations

Los Angeles Conservancy

Los Angeles GIS Data Portal

California Preservation Foundation

Experience Profile

Robby Aranguren is a Planning Associate/GIS Specialist with 11 years of experience in historic preservation in Southern California. Robby joined Historic Resources Group in 2009 as an intern and became full staff in 2010.

At HRG, Robby provides mapping, database creation and management, photography, and research for historic assessments. He also provides assistance with character-defining features inventories and paint analysis studies. He is proficient with the Microsoft Access Database, FiGSS GIS Survey System, Photoshop, Google SketchUp, ESRI ArcMap and ArcCatalog. He has worked on numerous large-scale historic resources surveys, building and manipulating large databases.

Prior to joining HRG, Robby worked at the City of Los Angeles, Office of Historic Resources, Department of Planning, preparing staff reports for Historic-Cultural Monument applications, preparing E-newsletters, assisting in the development of the Mills Act 2010 Online Application and Guide. Robby also served as acting secretary at Cultural Heritage Commission meetings and conducted building permit research.

Robby Aranguren meets the *Secretary of the Interior's Professional Qualifications Standards* in History and Architectural History.

Selected Projects

SurveyLA, Los Angeles
CBS Columbia Square Paint Sampling
Chapman University VPOA Window Survey
City of Riverside Modernism Survey
City of Palm Springs Citywide Survey
City of South Pasadena Citywide Survey Update
Glendale Central Air Terminal Paint Sampling
South Glendale Historic Context Statement & Historic Resources Survey
Jordan House Rehabilitation & Construction Monitoring, Whittier
Lincoln Place Apartments Historic Tax Credit, Los Angeles
UC Riverside Citrus Experiment Station Character-defining Features Inventory
Villa Elaine Character-defining Features Inventory
Wallace Annenberg Center for the Performing Arts Adaptive Reuse and Historic Tax Credit, Beverly Hills

APPENDIX H: PROJECT DRAWINGS

ABBREVIATIONS

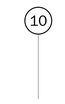
KEY	TERM	KEY	TERM	KEY	TERM	KEY	TERM	KEY	TERM
#	NUMBER	CONC	CONCRETE	GA	GAUGE	N.T.S.	NOT TO SCALE	SHT	SHEET
&	AND	COND	CONDITION	GAL	GALLON	N/A	NOT APPLICABLE	SIM	SIMILAR
(E)	EXISTING	CONST	CONSTRUCTION	GALV	GALVANIZED	NO	NUMBER	SPAC	SPACE(SPACING)
(N)	NEW	CONT	CONTINUOUS	GL	GLASS	O.C.	ON CENTER	SPEC	SPECIFICATION
15G	GALLON SIZE - TREE	CTR	CENTER	GRD	GROUND	O.D.	OUTSIDE DIAMETER	SQ	SQUARE
24"	BOX SIZE - TREE	CTSK	COUNTERSINK	GYP	GYPSUM	O.F.D.	OVER FLOW DRAIN	ST.STL	STAINLESS STEEL
@	AT	D.D.	DECK DRAIN	H	HIGH	O.H.	OVER HEAD	STL	STEEL
A.	ACRE	D.G.	DECOMPOSED GRANITE	H.B.	HOSE BIB	O/	OVER	STN	STAIN(ED)
A.C.	ASPHALTIC CONCRETE	DBL	DOUBKLE	H.P.	HIGH PERFORMANCE	OBS	OBSCURED	STOR	STORAGE
A.D.	AREA DRAIN	DIAM	DIAMETER	HDR	HEADER	OPER	OPER(ATION)(ABLE)	STRUCT	STURCTUR(E)(AL)
A.F.F.	ABOVE FINISH FLOOR	DIM	DIMENSION	HDWR	HARDWARE	OPNG	OPENING	SUSP	SUSPENDED
A/C	AIR CONDITIONING	DIVS	DIVISIONS	HORIZ	HORIZONTAL	OPP	OPPOSITE	SYM	SYMMETRICAL
ADJ.	ADJUSTABLE or ADJACENT	DN	DOWN	HR	HOUR	P-LAM	PLASTIC LAMINATE	T&G	TONGUE AND GROVE
AGG.	AGGREGATE	DRWR	DRAWER	HT	HEIGHT	P.A.	PLANTING AREA	T	TREAD
ALT	ALTERNATE	DS	DOWNSPOUT	HVAC	HEATING VENTILATING & AIRCONDITIONING	P.C.C.	PRECAST CONCRETE	T.C.	TOP OF CURVE
ALUM	ALUMINUM	DTL	DETAIL			P.I.P.	POURED IN PLACE	T.D.D.	TOP OF DECK DRAIN
APPROX	APPROXIMATE(LY)	DWG	DRAWING	I.D.	INSIDE DIAMETER	P.L.	PROPERTY LINE	T.O.	TOP OF
ARCH	ARCHITECT(URAL)	E	EAST	I.E.	INVERT ELEVATION	P.O.C.	POINT OF CONNECTION	T.P.	TOP OF PAVING
AUTO	AUTOMATIC	E.J.	EXPANSION JOINT	INT.	INTEGRAL	P.S.I.	POUNDS PER SQUARE INCH	T.S.	TOP OF STAIRS
B.S.	BOTTOM OF STEP	EA	EACH	INV	INVERT	PERF	PERFORATED	T.W.	TOP OF WALL
B.T.	BROWN TRUNK	EL	ELEVATION	J.BOX	JUNCTION BOX	PLAS	PLASTER	TBD	TO BE DETERMINED
B.W.	BOTTOM OF WALL	ELEC	ELECTRIC(AL)	JT		PLYWD	PLYWOOD	TEMP	TEMPERED
BD	BOARD	ENG.	ENGINEER	L	LENGTH	PROJ	PROJECT	TERM	TERMINATION
BLDG	BUILDING	EQ	EQUAL	L.A.	LANDSCAPE ARCHITECT	PT(D)	PAINT(ED)	THK	THICK
BLKG	BLOCKING	EQUIP	EQUIPMENT	L.P.	LOW POINT	PVC	POLYVINYL CHLORIDE	THRES	THRESHOLD
BM	BEAM	EXP	EXPANSION	LAM	LAMINATE(D)	R	RADIUS	TYP	TYPICAL
BTWN	BETWEEN	EXT	EXTERIOR	LAV	LAVATORY	R.O.	ROUGH OPENING	U.B.C.	UNIFORM BUILDING CODE
BYD	BEYOND	F.F.	FINISH FLOOR	M.B.	MACHINE BOLT	RCP	REFLECTED CEILING PLAN	U.N.O.	UNLESS OTHERWISE NOTED
C.A.B.	COMPOSITE AGGREGATE BASE	F.F.E.	FINISH FLOOR ELEVATION	M.E.	MECHANICAL ENGINEER	REBAR	REINFORCING BAR	V.I.F.	VERIFY IN FIELD
C.B.	CATCH BASING	F.G.	FINISH GRADE	M.H.	MAN HOLE	REF	REFER(ENCE)	VCT	VINYL COMPOSITE TILE
C.F.	CUBIC FOOT	F.H.	FIRE HYDRANT	MATL	MATERIAL	REQ(D)	REQUIRED	VEN	VENEER
C.I.P.	CAST IN PLACE	F.O.S.	FACE OF STUD	MAX	MAXIMUM	RM	ROOM	VERT	VERTICAL
C.J.	COLD JOINT	F.O.W.	FACE OF WALL	MECH	MECHANICAL	RWD	REDWOOD	W	WEST or WIDTH
C.L.	CENTER LINE	F.R.	FIRE RATED	MED.	MEDIUM	S	SOUTH	W.C.	WATER CLOSET
CAB	CABINET	F.S.	FINISH SURFACE	MFR	MANUFACTURER	S.E.R.	SOIL ENGINEER'S REPORT	W.H.	WATER HEATER
CEM	CEMENT(ITOUS)	FDN	FOUNDATION	MIN	MINIMUM	S.F.	SQUARE FEET or FOOT	W.P.	WATER PROOFING
CLG	CEILING	FIN	FINISH	MISC	MISCELLANEOUS	S.L.	SCORE LINE	W/	WITH
CLO	CLOSET	FLR	FLOOR	MTL	METAL	SCHED	SCHEDULE	W/O	WITHOUT
CLR	CLEAR(ANCE)	FR	FRAME	MULTI	MULTI-TRUNK	SCW	SOLID CORE WOOD	WD	WOOD
CMU	CONCRETE MASONRY UNIT	FT	FEET or FOOT	N	NORTH	SECT	SECTION		
COL	COLUMN	FTG	FOOTING	N.I.C.	NOT IN CONTRACT	SGL	SINGLE		

SYMBOLS

SECTION CUT KEY



COLUMN BUBBLE



ALIGN



PANEL TAG



CLG HEIGHT



GLAZING TAG



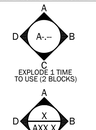
STOREFRONT



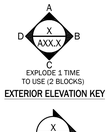
ADDENDUM NUMBER



INTERIOR ELEVATION KEYS



EXPLODE ± TIME TO USE (2 BLOCKS)

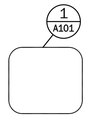


EXPLODE ± TIME TO USE (2 BLOCKS)

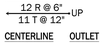
EXTERIOR ELEVATION KEY



DETAIL BUBBLE & KEY



STAIR ARROW



CENTERLINE

OUTLET



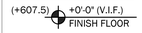
ROOM LABEL



DOOR LABEL



TOP OR BOTTOM ELEVATION (R)



TOP OR BOTTOM ELEVATION (L)



ELEVATION MARK WITH TAG

ELEVATION MARK



WITH TAG



WORK POINT



WORK POINT TAG



WALL TYPE



KEYNOTE



FINISH TAG

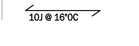
DRAINAGE ARROW



BREAK LINE

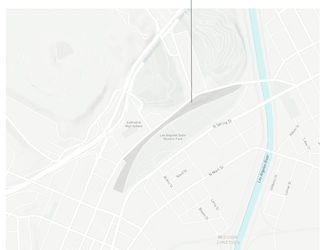


FRAMING ARROW



VICINITY MAP

PROJECT LOCATION
1251 North Spring Street,
1030 - 1380 North Broadway,
Los Angeles, CA 90038



DRAWING NORTH

BUENA VISTA

1251 North Spring St, 1030-1038 Broadway
Los Angeles, CA 90012

PROJECT TEAM

PROJECT MANAGEMENT
LINCOLN PROPERTY COMPANY
915 WILSHIRE BOULEVARD, SUITE 2050
LOS ANGELES, CA 90017
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TBD

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T:
CONTACT: KURT CLANDENING

FIRE/LIFE-SAFETY
ARUP
12777 WEST JEFFERSON BLVD, SUITE 100
LOS ANGELES, CA 90066
T:
CONTACT: BRIAN McLAUGHLIN

PROJECT DATA

PROJECT DESCRIPTION: **THE PROPOSED PROJECT IS AN INFILL, MIXED USE DEVELOPMENT CONSISTING OF RESIDENTIAL AND RETAIL USES ON 8.1 ACRES RUNNING NORTH ALONG BROADWAY DRIVE. THE DEVELOPMENT CONSISTS OF SIX BUILDINGS RANGING FROM 2 TO 26 STORIES TALL AND A TOTAL OF 986 RESIDENTIAL UNITS. THE DEVELOPMENT WILL INCLUDE PUBLIC PLAZAS AND GARAGED PARKING TOTALING UP TO 1,477 VEHICLE SPACES.**

ADDRESS: **1251 NORTH SPRING STREET, 1030 - 1380 BROADWAY, LOS ANGELES, CA 90012**

APN: **5414016002**

ZONING: **MR2-1 CURRENT, C2-2D PROPOSED**

SHEET INDEX

SHEET NO.	SHEET TITLE	ENTITLEMENT 07/01/2024
GENERAL		
G0.00	TITLE SHEET AND DRAWING INDEX	•
G0.01	ANALYSIS - ZONING, PARKING, AREA	•
G0.10	DIAGRAMS - MASSING	•
G0.11	DIAGRAMS - SETBACKS	•
G0.12	DIAGRAMS - OPEN SPACE AREAS	•
G0.13	DIAGRAM - SITE ACCESS	•
G0.20	PERSPECTIVE VIEWS	•
G0.21	PERSPECTIVE VIEWS	•
G0.30	PLAN - SOUTH - P3 PUBLIC OPEN SPACE	•
G0.31	PLAN - SOUTH - L1 PUBLIC OPEN SPACE	•
G0.32	PLAN - NORTH - L1 PUBLIC OPEN SPACE	•
SITE PLANS		
AS1.00	PLOT PLAN - EXISTING ELEMENTS	•
AS1.01	PLOT PLAN - OVERALL	•
AS1.01	PLOT PLAN - ENLARGED - NORTH, SOUTH	•
AS1.03	PLOT PLAN - ENLARGED - CENTRAL	•
PLANS		
A1.00	PLANS - SOUTH PARCEL - P3	•
A1.01	PLANS - SOUTH PARCEL - P2	•
A1.02	PLANS - SOUTH PARCEL - P1	•
A1.03	PLANS - SOUTH PARCEL - FL1	•
A1.04	PLANS - SOUTH PARCEL - FL2	•
A1.05	PLANS - SOUTH PARCEL - FL3-4	•
A1.06	PLANS - SOUTH PARCEL - FL5	•
A1.07	PLANS - SOUTH PARCEL - FL6-21	•
A1.08	PLANS - SOUTH PARCEL - FL22	•
A1.09	PLANS - SOUTH PARCEL - FL23	•
A1.10	PLANS - SOUTH PARCEL - FL24-25	•
A1.11	PLANS - SOUTH PARCEL - FL26	•
A1.12	PLANS - SOUTH PARCEL - ROOF	•
A1.20	PLANS - NORTH PARCEL - P3	•
A1.21	PLANS - NORTH PARCEL - P2	•
A1.22	PLANS - NORTH PARCEL - P1	•

SHEET NO.	SHEET TITLE	ENTITLEMENT 07/01/2024
A1.23	PLANS - NORTH PARCEL - FL1	•
A1.24	PLANS - NORTH PARCEL - FL2	•
A1.25	PLANS - NORTH PARCEL - FL3-5	•
A1.26	PLANS - NORTH PARCEL - FL6	•
A1.27	PLANS - NORTH PARCEL - FL7-14	•
A1.28	PLANS - NORTH PARCEL - FL15	•
A1.29	PLANS - NORTH PARCEL - ROOF	•
A1.40	PLANS - ENLARGED UNIT PLANS - STU	•
A1.45	PLANS - ENLARGED UNIT PLANS - 1BR	•
A1.50	PLANS - ENLARGED UNIT PLANS - LW	•
A1.55	PLANS - ENLARGED UNIT PLANS - 2BR	•
A1.60	PLANS - ENLARGED UNIT PLANS - 3BR	•
ELEVATIONS		
A2.00	ELEVATIONS - SOUTH PARCEL - NORTH	•
A2.01	ELEVATIONS - SOUTH PARCEL - NORTH	•
A2.02	ELEVATIONS - SOUTH PARCEL - WEST	•
A2.03	ELEVATIONS - SOUTH PARCEL - SOUTH	•
A2.04	ELEVATIONS - SOUTH PARCEL - SOUTH	•
A2.05	ELEVATIONS - SOUTH PARCEL - EAST	•
A2.10	ELEVATIONS - NORTH PARCEL - NORTH	•
A2.11	ELEVATIONS - NORTH PARCEL - WEST, EAST	•
A2.12	ELEVATIONS - NORTH PARCEL - SOUTH	•
A2.20	ELEVATIONS - MATERIAL BOARDS	•
A2.21	ELEVATIONS - MATERIAL BOARDS	•
SECTIONS		
A3.00	SECTIONS - SOUTH PARCEL - LONGITUDINAL	•
A3.01	SECTIONS - SOUTH PARCEL - LONGITUDINAL	•
A3.02	SECTIONS - SOUTH PARCEL - TRANSVERSE	•
A3.03	SECTIONS - SOUTH PARCEL - TRANSVERSE	•
A3.10	SECTIONS - NORTH PARCEL - LONGITUDINAL	•
A3.11	SECTIONS - NORTH PARCEL - TRANSVERSE	•
A3.12	SECTIONS - NORTH PARCEL - TRANSVERSE	•

SHEET NO.	SHEET TITLE	ENTITLEMENT 07/01/2024
LANDSCAPE		
L1.10	OVERALL SITE PLAN	•
L2.01	LANDSCAPE PLAN PODIUM LEVEL	•
L2.10	SOUTH PARCEL PODIUM	•
L2.11	SOUTH PARCEL L5	•
L2.12	SOUTH PARCEL ROOF	•
L2.20	NORTH PARCEL PODIUM	•
L2.21	NORTH PARCEL TERRACES	•
L2.30	CENTRAL GREENSPACE	•
L3.10	SOUTH PARCEL PODIUM - ENLARGEMENT	•
L3.11	SOUTH PARCEL L5 - ENLARGEMENT	•
L3.12	SOUTH PARCEL ROOF - ENLARGEMENT	•
L3.20	NORTH PARCEL PODIUM - ENLARGEMENT	•
L3.21	NORTH PARCEL TERRACES - ENLARGEMENT	•
L4.10	LANDSCAPE ELEVATION - SOUTH PARCEL	•
L4.11	LANDSCAPE ELEVATION - SOUTH PARCEL	•
L4.20	LANDSCAPE ELEVATION - NORTH PARCEL	•
L4.30	LANDSCAPE ELEVATION - CENTRAL GREEN	•
L5.00	GREENWALL PLANTING SECTION	•
L6.00	PLANTING SCHEDULE	•
L6.01	PLANT PALETTE IMAGERY	•
L6.02	PLANT PALETTE IMAGERY	•
L6.03	HYDROZONE CALCULATION	•
L7.01	SOUTH PARCEL PODIUM - HYDROZONE PLAN	•
L7.02	SOUTH PARCEL LEVEL 5 - HYDROZONE PLAN	•
L7.03	SOUTH PARCEL ROOF - HYDROZONE PLAN	•
L7.04	NORTH PARCEL PODIUM - HYDROZONE PLAN	•
L7.05	NORTH PARCEL TERRACES - HYDROZONE PLAN	•
L7.06	CENTRAL GREENSPACE - HYDROZONE PLAN	•
L7.10	SOUTH PARCEL PODIUM - PLANTING PLAN	•
L7.11	SOUTH PARCEL LEVEL 5 - PLANTING PLAN	•
L7.12	SOUTH PARCEL ROOF - PLANTING PLAN	•
L7.13	NORTH PARCEL PODIUM - PLANTING PLAN	•
L7.14	NORTH PARCEL TERRACES - PLANTING PLAN	•
L7.15	CENTRAL GREENSPACE - PLANTING PLAN	•

ENTITLEMENT

NOT FOR CONSTRUCTION

RIOS
3101 W EXPOSITION PLACE
LOS ANGELES, CA 90018
PH: 323.785.1000
FAX: 323.785.1001
rios.com

PROJECT ID **18046**

CONSULTANT

REVISIONS

ISSUED ENTITLEMENT 07/01/2024

DRAWING TITLE TITLE SHEET & DRAWING INDEX

SCALE N/A (UNLESS INDICATED ON DETAIL SHEET)

DRAWING NO. G0.00

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ZONING CODE SUMMARY

LAMC SECTION	DESCRIPTION
	GENERAL INFORMATION
	PROJECT ADDRESS: 1251 N. SPRING STREET
	LOT AREA: 342,678 SF
	PROJECT AREA: 1,245,536 SF (SEE SEPARATE ZONING FLOOR AREA ANALYSIS)
	PROJECT FAR: 3.63 (SEE SEPARATE ZONING FLOOR AREA ANALYSIS)
	APPLICABLE OVERLAYS:
	- HISTORIC PRESERVATION REVIEW - AFFORDABLE HOUSING LINKAGE FEE – MEDIUM HIGH (FOR RESIDENTIAL MARKET AREA) - AFFORDABLE HOUSING LINKAGE FEE – MEDIUM (FOR NON-RESIDENTIAL MARKET AREA) - TIER 4 TOC - METHANE ZONE - WITHIN FAULT ZONE; LIQUEFACTION - EAST LOS ANGELES STATE ENTERPRISE ZONE
	ENTITLEMENT REQUESTS:
	- GENERAL PLAN AMENDMENT FROM LIGHT MANUFACTURING TO REGIONAL COMMERCIAL - ZONE CHANGE FROM MR2 TO C2 - HEIGHT DISTRICT 1 TO HEIGHT DISTRICT 2D - EXCEED TRANSITIONAL HEIGHT - REDUCED SETBACK REQUIREMENTS - REVIEW OF VESTING TENTATIVE TRACT MAP (VTTM 74548) - HAUL ROUTE APPROVAL - DEVELOPMENT AGREEMENT - CERTIFICATION OF THE ENVIRONMENTAL IMPACT REPORT - ADDITIONAL APPROVALS AND PERMITS FROM LADBS FOR PROJECT CONSTRUCTION - DISCRETIONARY AND MINISTERIAL PERMITS AND APPROVAL
	ZONING USE
12.18.A	**CURRENT ZONING:** MR2-1 (RESTRICTED LIGHT INDUSTRIAL)
12.18.B	**MR2 ALLOWABLE USES:** LIMITED COMMERCIAL AND MANUFACTURING, LIMITED MACHINE SHOPS, ANIMAL HOSPITALS
12.14A	**PROPOSED ZONING:** C2 (COMMERCIAL) **C2 ALLOWABLE USES:** C1, C1.5, C2
12.13A	**C1 ALLOWABLE USES:** LOCAL RETAIL STORES < 100,000 SQ. FT., OFFICES OR BUSINESSES, HOTELS, HOSPITALS AND/OR CLINICS, PARKING AREAS, CR USES EXCEPT FOR CHURCHES, SCHOOLS, MUSEUMS, R3 USES (REFERENCES R2 USES – INCL. APARTMENT HOUSES, MULTIPLE DWELLINGS)
12.13.5A	**C1.5 ALLOWABLE USES:** USES–RETAIL, THEATERS, HOTELS, BROADCASTING STUDIOS, PARKING BUILDINGS, PARKS AND PLAYGROUNDS, R4 USES (REFERENCES R3 USES – R2 USES PLUS APT HOUSES, MULT. DWELLINGS, CHILD CARE, IN ADDITION TO CHURCHES, SCHOOLS, CHILDCARE, HOMELESS SHELTER)
12.14A	**C2 ALLOWABLE USES:** RETAIL W/LIMITED MANUF., SERVICE STATIONS AND GARAGES, RETAIL CONTR. BUSINESS, CHURCHES, SCHOOLS, AUTO SALES, R4 USES (REFERENCES R3 USES – R2 USES PLUS APT HOUSES, MULT. DWELLINGS, CHILD CARE, IN ADDITION TO CHURCHES, SCHOOLS, CHILDCARE, HOMELESS SHELTER)
12.11	**PROPSOSED PRIMARY USE:** R4 IN C2 (MULTIPLE DWELLING)
	BUILDING HEIGHT AND FAR
12.21.1.A1	**CURRENT HEIGHT DISTRICT:** 1 **CURRENT MAX FAR (HD-1):** 1.5 **CURRENT MAX ALLOWABLE BUILDING HEIGHT:** UNLIMITED
12.21.1.A2	**PROPOSED HEIGHT DISTRICT:** 2D **PROPOSED FAR WITH OVERHANG - CIRCULATION AND BALCONIES:** 3.63 **PROPOSED MAX ALLOWABLE BUILDING HEIGHT:** UNLIMITED
	PROPOSED FAR PER LAMC: 3.29 (SEE SEPARATE LOT AREA AND ZONING FLOOR AREA ANALYSIS)
12.21.1.A10	**TRANSITIONAL HEIGHT REQUIREMENT:** (SEE SEPARATE TRANSITIONAL HEIGHT DIAGRAM) DISTRANCE FROM RW-1 ZONE / MAX HEIGHT ON SITE 0'-49': 25' 50'-99': 33' 100'-199': 61'
12.03	**APPLICABLE DEFINITIONS:** **GRADE:** THE LOWEST POINT OF ELEVATION OF THE FINISHED SURFACE OF THE GROUND, PAVING OR SIDEWALK WITHIN THE AREA BETWEEN THE BUILDING AND THE PROPERTY LINE, OR WHEN THE PROPERTY LINE IS MORE THAN 5 FEET FROM THE BUILDING, BETWEEN THE BUILDING AND A LINE 5' FROM THE BUILDING.
12.03	**HEIGHT OF BUILDING/STRUCTURE:** THE VERTICAL DISTANCE ABOVE GRADE MEASURED TO THE HIGHEST POINT OF THE ROOF, STRUCTURE, OR THE PARAPET WALL, WHICHEVER IS HIGHER. RETAINING WALLS SHALL NOT BE USED FOR THE PURPOSE OF RAISING THE EFFECTIVE ELEVATION OF THE FINISHED GRADE FOR PURPOSES OF MEASURING THE HEIGHT OF A BUILDING OR STRUCTURE.
	SETBACKS
	NOTE: SEE SEPARATE SETBACK ANALYSIS FOR PROPOSED SETBACKS
12.14.C 12.03	**FRONT YARD:** **FRONT LOT LINE:** IN THE CASE OF AN INTERIOR LOT, THE LINE SEPARATING THE LOT FROM THE STREET OR PLACE, AND IN THE CASE OF A CORNER LOT, A LINE SEPARATING THE NARROWEST STREET FRONTAGE OF THE LOT FROM THE STREET, EXCEPT IN THOSE CASES WHERE THE LATEST TRACT DEED RESTRICTIONS SPECIFY ANOTHER LINE AS THE FRONT LOT LINE. **FRONT YARD REQUIREMENT:** N/A FOR R4 IN C2
12.11.C2 12.03	**SIDE YARDS:** **SIDE LOT LINE:** ANY LOT BOUNDARY LINE NOT A FRONT LOT LINE OR A REAR LOT LINE **NOTE:** FOR ALL PORTIONS OF BUILDINGS ERECTED AND USED FOR RESIDENTIAL PURPOSES, SIDE AND REAR YARD CONFORMING TO THE REQUIREMENTS OF THE R4 ZONE (SECTION 12.11 C.2. AND 3.) SHALL BE PROVIDED AND MAINTAINED AT THE FLOOR LEVEL OF THE FIRST STORY USED IN WHOLE OR IN PART FOR RESIDENTIAL PURPOSES **SIDE YARD REQUIREMENT:** 5' + 1' FOR EACH STORY OVER 2ND STORY, NOT TO EXCEED 16' **SOUTH PARCEL MINIMUM SIDE YARD REQUIRMENT:** 1. BLDG 1 (25 STORIES RESI + 1 MECHANICAL = 26 STORIES TOTAL): 16' 2. PODIUM (5 STORIES RESI + 1 MECHANICAL = 6 STORIES TOTAL): 5' 3. BLDG 2 (21 STORIES RESI + 1 MECHANICAL = 22 STORIES TOTAL): N/A **NORTH PARCEL MINIMUM SIDE YARD REQUIRMENT:** 4. RETAIL BLOCK (5 STORIES RESI + 1 MECHANICAL = 6 STORIES TOTAL): N/A 5. COURTYARD BLDG (8 STORIES RESI + 1 MECHANICAL = 9 STORIES TOTAL): N/A 6. PODIUM (4 STORIES + 1 MECHANICAL = 5 STORIES TOTAL): N/A 7. NORTH BLDG (17 STORIES + 1 MECHANICAL = 18 STORIES TOTAL): N/A
12.11.C3 12.03	**REAR YARDS:** **REAR LOT LINE:** A LOT LINE WHICH IS OPPOSITE AND MOST DISTANT FROM THE FRONT LOT LINE AND, IN THE CASE OF AN IRREGULAR, TRIANGULAR, OR GORE-SHAPED LOT, A LINE TEN (10) FEET IN LENGTH WITHIN THE LOT, PARALLEL TO AND AT THE MAXIMUM DISTANCE FROM THE FRONT LINE. **NOTE:** FOR ALL PORTIONS OF BUILDINGS ERECTED AND USED FOR RESIDENTIAL PURPOSES, SIDE AND REAR YARD CONFORMING TO THE REQUIREMENTS OF THE R4 ZONE (SECTION 12.11 C.2. AND 3.) SHALL BE PROVIDED AND MAINTAINED AT THE FLOOR LEVEL OF THE FIRST STORY USED IN WHOLE OR IN PART FOR RESIDENTIAL PURPOSES. **REAR YARD REQUIREMENT:** 15' +1' FOR EACH STORY OVER 3RD STORY, 20' MAX. **SOUTH PARCEL MINIMUM REAR YARD REQUIRMENT:** 1. BLDG 1 (25 STORIES RESI + 1 MECHANICAL = 26 STORIES TOTAL): 20' 2. PODIUM (5 STORIES RESI + 1 MECHANICAL = 6 STORIES TOTAL): 18' 3. BLDG 2 (21 STORIES RESI + 1 MECHANICAL = 22 STORIES TOTAL): 20' **NORTH PARCEL MINIMUM REAR YARD REQUIRMENT :** 4. RETAIL BLOCK (5 STORIES RESI + 1 MECHANICAL = 6 STORIES TOTAL): 18' 5. COURTYARD BLDG (8 STORIES RESI + 1 MECHANICAL = 9 STORIES TOTAL): 20' 6. PODIUM (4 STORIES + 1 MECHANICAL = 5 STORIES TOTAL): 17' 7. NORTH BLDG (17 STORIES + 1 MECHANICAL = 18 STORIES TOTAL): 20'
	PARKING
	NOTE: SEE SEPARATE SETBACK ANALYSIS FOR PROPOSED PARKING ANALYSIS
	FIRE LANES
	- 20' MIN., WHEN NO PARKING IS ALLOWED ON EITHER SIDE - 28', WHEN THE FIRE LANE NEEDS TO ACCOMMODATE THE OPERATION OF THE FD AERIAL LADDER APPARATUS AND NO PARKING IS ALLOWED ON EITHER SIDE - 28', WHEN WITHIN 30' OF A PRIVATE FIRE HYDRANT, NO PARKING IS ALLOWED IN THIS AREA - WHEN PARKING IS ALLOWED ON ONE SIDE, HYDRANTS SHOULD BE LOCATED ON THE SAME SIDE - WHEN PARALLEL PARKING IS ALLOWED ON EITHER SIDE OF A FIRE LANE, THE ROADWAY WIDTH SHOULD BE INCREASED BY 8' FOR EACH LANE - 14' OVERHEAD CLEARANCE, WHEN ACCOMMODATING FD APPARATUS - DEAD ENDS – TERMINATE IN CUL-DE-SAC OR TURNING AREA PER DEPT OF PUBLIC WORKS STANDARD STREET DIMENSION, PLAN D-22549

ZONING FLOOR AREAS

	PROPOSED FLOOR AREA (RESIDENTIAL)										TRELLIS/OVERHANG - CIRCULATION AND BALCONIES FLOOR AREA			RESTAURANT/RETAIL FLOOR AREA					GARAGE FLOOR AREA			TOTAL FLOOR AREA
	NORTH PARCEL					SOUTH PARCEL																
LEVEL	RETAIL BLOCK	COURTYARD BUILDING	PODIUM	NORTH BUILDING	NORTH SUBTOTAL	BUILDING 1	PODIUM	BUILDING 2	SOUTH SUBTOTAL	RESIDENTIAL SUBTOTAL	NORTH PARCEL	SOUTH PARCEL	OVERHANG - CIRCULATION AND BALCONIES SUBTOTAL	NORTH PARCEL	NORTH PARCEL EXTERIOR	SOUTH PARCEL	SOUTH PARCEL EXTERIOR	RESTAURANT/ RETAIL SUBTOTAL	NORTH PARCEL	SOUTH PARCEL	GARAGE SUBTOTAL	BY FLOOR
P3			1,754		**1,754**		4,940		**4,946**	**6,700**		8,694	**8,694**			620		**620**	108,619	112,555	**221,174**	**237,188**
P2			38,119		**38,119**		2,996		**2,996**	**41,115**	4,240		**4,240**						67,248	106,906	**174,154**	**219,509**
P1			35,630		**35,630**		4,340		**4,340**	**39,970**	5,711		**5,711**			1,565		**1,565**	69,224	101,108	**170,332**	**217,578**
1	6,789	20,616	4,871	10,116	**42,392**		42,900		**42,900**	**85,292**	24,604	16,879	**41,483**	10,000	3,000	13,285	5,800	**32,085**				**158,860**
2	6,899	13,969	4,876	10,287	**36,031**		43,160		**43,160**	**79,191**	4,114	5,336	**9,450**			4,530		**4,530**				**93,171**
3		30,482		9,266	**39,748**		69,088		**69,088**	**108,836**	8,064	712	**8,776**					-				**117,612**
4		30,482		10,889	**41,371**		69,088		**69,088**	**110,459**	1,795	712	**2,507**					-				**112,966**
5		30,482		10,889	**41,371**	11,496	27,322	11,496	**50,314**	**91,685**	1,795	414	**2,209**					-				**93,894**
6		1,671		10,889	**12,560**	11,496		11,496	**22,992**	**35,552**	2,416	862	**3,278**					-				**38,830**
7				11,787	**11,787**	11,496		11,496	**22,992**	**34,779**	1,951	862	**2,813**					-				**37,592**
8				11,787	**11,787**	11,496		11,496	**22,992**	**34,779**	1,951	862	**2,813**					-				**37,592**
9				11,787	**11,787**	11,496		11,496	**22,992**	**34,779**	1,951	862	**2,813**					-				**37,592**
10				11,787	**11,787**	11,496		11,496	**22,992**	**34,779**	1,951	862	**2,813**					-				**37,592**
11				11,787	**11,787**	11,496		11,496	**22,992**	**34,779**	1,951	862	**2,813**					-				**37,592**
12				11,787	**11,787**	11,496		11,496	**22,992**	**34,779**	1,951	862	**2,813**					-				**37,592**
13				11,787	**11,787**	11,496		11,496	**22,992**	**34,779**	1,951	862	**2,813**					-				**37,592**
14				11,787	**11,787**	11,496		11,496	**22,992**	**34,779**	1,951	862	**2,813**					-				**37,592**
15					-	11,496		11,496	**22,992**	**22,992**		862	**862**					-				**23,854**
16					-	11,496		11,496	**22,992**	**22,992**		862	**862**					-				**23,854**
17					-	11,496		11,496	**22,992**	**22,992**		862	**862**					-				**23,854**
18					-	11,496		11,496	**22,992**	**22,992**		862	**862**					-				**23,854**
19					-	11,496		11,496	**22,992**	**22,992**		862	**862**					-				**23,854**
20					-	11,496		11,496	**22,992**	**22,992**		862	**862**					-				**23,854**
21					-	11,496		11,496	**22,992**	**22,992**		862	**862**					-				**23,854**
22					-	11,496		3,083	**14,579**	**14,579**		431	**431**					-				**15,010**
23					-	11,496			**11,496**	**11,496**		431	**431**					-				**11,927**
24					-	11,496			**11,496**	**11,496**		431	**431**					-				**11,927**
25					-	11,496			**11,496**	**11,496**		431	**431**					-				**11,927**
26					-	3,083			**3,083**	**3,083**			-					-				**3,083**
TOTAL	**13,688**	**127,702**	**85,250**	**156,632**	**383,272**	**244,499**	**263,840**	**198,515**	**706,854**	**1,090,126**	**68,347**	**48,263**	**116,610**	**10,000**	**3,000**	**20,000**	**5,800**	**38,800**	**245,091**	**320,569**	**565,660**	**1,811,196**

AREA SUMMARY	
RESIDENTIAL	1,090,126
RESTAURANT	23,800
RETAIL	15,000
SUBTOTAL	**1,128,926**
TRELLIS/OVERHANG - CIRCULATION AND BALCONIES	116,610
TOTAL AREA	**1,245,536**
LOT AREA	342,678
FAR WITH TRELLIS/OVERHANG - CIRCULATION AND BALCONIES	**3.63**

SOUTH PARCEL - UNIT MIX

UNIT COUNT BY TYPE	STUDIO	1 BR	2 BR	3 BR	LW	SUBTOTAL
BUILDING 1	54	106	68	0	0	228
PODIUM	4	97	75	35	2	213
BUILDING 2	48	90	52	0	0	190
TOTAL UNITS	106	293	195	35	2	**631**
MIX PERCENTAGE	17%	46%	31%	5.5%	0.3%	100%

NORTH PARCEL - UNIT MIX

UNIT COUNT BY TYPE	STUDIO	1 BR	2 BR	3 BR	LW	SUBTOTAL
BUILDING 3	28	72	52	0	0	152
PODIUM	10	46	12	2	0	70
COURTYARD BUILDING	0	55	40	21	5	121
RETAIL BLOCK	0	2	8	2	0	12
TOTAL UNITS	38	175	112	25	5	**356**
MIX PERCENTAGE	11%	49%	32%	7%	1%	100%

SOUTH PARCEL PARKING

SOUTH PARCEL PARKING - VEHICULAR PARKING TOTALS

RESIDENTIAL REQUIREMENTS							PROVIDED
	UNIT TYPE						
	LW	STUDIO	1 BR	2 BR	3 BR	TOTAL	
TOTAL UNITS	2	106	293	195	35	**631**	
MIX PERCENTAGE	0.3%	16.8%	46.4%	30.9%	5.5%	100%	
HABITABLE ROOMS	3	< 3	3	> 3	> 3		
PARKING RATIO (LAMC 12.21 A.4AB)	1.5	1.0	1.5	2.0	2.0		
TOTAL PARKING REQUIRED	3	106	440	390	70	**1009**	
BIKE PARKING OFFSET (LAMC 12.21 A.4)					**13%**	131	
TOTAL PARKING REQUIRED AFTER OFFSET						**878**	**879**

RETAIL AND RESTAURANT REQUIREMENTS				PROVIDED
	RESTAURANT	RETAIL	TOTAL	
TOTAL AREA	15,833	10,000	25,800	
PARKING RATIO 12.21A4(x)(3)	2 SPACES PER 1,000 SF	2 SPACES PER 1,000 SF		
TOTAL PARKING REQUIRED	32	20	**52**	
BIKE PARKING OFFSET (LAMC 12.21 A.4)		**0%**	0	
TOTAL PARKING REQUIRED AFTER OFFSET			**52**	**52**

TOTAL PARKING REQUIRED (RESIDENTIAL, RETAIL AND RESTAURANT)		PROVIDED
TOTAL PARKING REQUIRED	1061	
TOTAL PARKING REQUIRED AFTER OFFSET	**930**	**931**
STANDARD		491
COMPACT		56
TANDEM		201
STACKED		183

ELECTRONIC VEHICLE SPACES

REQUIRED EV SPACES RATIO: 30% OF TOTAL; (LAMC 99.04.106.2.2.1; LAMC 99.05.106.5.3.1)
RESIDENTIAL REQUIRED EV CHARGING STATIONS RATIO: 13% OF TOTAL (99.04.106.2.2.1)
NON-RESIDENTIAL REQUIRED EV CHARGING STATIONS RATIO: 20% OF TOTAL (99.05.106.5.3.2)

RESIDENTIAL EV REQUIREMENTS		PROVIDED
REQUIRED EV SPACES	**263**	**263**
REQUIRED EV CHARGING STATIONS	**88**	**88**

RETAIL AND RESTAURANT EV REQUIREMENTS		PROVIDED
REQUIRED EV SPACES	**15**	**15**
REQUIRED EV CHARGING STATIONS	**10**	**10**

SOUTH PARCEL - ADA SPACES

REQUIRED ACCESIBLE NON-EVCS TOTAL RATIO: (LABC 11B 208.2) 26-50 TOTAL SPACES: 2 51-75 TOTAL SPACES: 3 401 TO 500 TOTAL SPACES: 9 501 TO 1,000 TOTAL SAPCES: 2% OF TOTAL
REQUIRED ACCESSIBLE NON-EVCS VAN RATIO: (LABC 11B 502) 1 FOR EVERY 6 OR FRACTION THEREOF
REQUIRED ACCESSIBLE EVCS RATIOS: (LABC 11B208.3.2.1)

TOTAL EVCS AT FACILITY	VAN	STANDARD	AMBULATORY
1-4	1	0	0
5-25	1	1	0
26-50	1	1	1
51-75	1	2	3
76-100	1	3	3
101+	1, PLUS 1 FOR EACH 300, OR FRACTION THEREOF, OVER 100	3, PLUS 1 FOR EACH 60, OR FRACTION THEREOF, OVER 100	3, PLUS 1 FOR EACH 50, OR FRACTION THEREOF, OVER 100

RESIDENTIAL ADA REQUIREMENTS		PROVIDED
ADA - STANDARD	15	
ADA - VAN	3	
TOTAL ADA - NON-EVCS	**18**	
ADA - EVCS - STANDARD	3	
ADA - EVCS - VAN	1	
ADA - EVCS - AMBULATORY	3	
TOTAL ADA - EVCS	**7**	
TOTAL ADA - RESIDENTIAL	**25**	**25**

RETAIL AND RESTAURANT ADA REQUIREMENTS		PROVIDED
ADA - STANDARD	2	
ADA - VAN	1	
TOTAL ADA - NON-EVCS	**3**	
ADA - EV - STANDARD	1	
ADA - EV - VAN	1	
ADA - EV - AMBULATORY	0	
TOTAL ADA - EVCS	**2**	
TOTAL ADA - RETAIL AND RESTAURANT	**5**	**5**

SOUTH PARCEL - BICYCLE PARKING

RESIDENTIAL BICYCLE PARKING REQUIREMENTS				
REQUIRED RATIO: LAMC 12.21 A.16 (a)(1)(i)				
DWELLING UNITS	SHORT TERM RATIO	REQ	LONG TERM RATIO	REQ
1-25	1 PER 10 UNITS	3	1 PER UNIT	25
26-100	1 PER 15 UNITS	5	1 PER 1.5 UNITS	50
101-200	1 PER 20 UNITS	5	1 PER 2 UNITS	50
201+	1 PER 40 UNITS	4	1 PER 4 UNITS	100
SUBTOTAL		**24**		**233**
RESIDENTIAL PARKING ADDITIONAL OFFSET SPACES				268
RESIDENTIAL BICYCLE PARKING TOTAL REQUIRED				**524**

RESIDENTIAL BICYCLE PARKING TOTAL PROVIDED - SHORT TERM	40
RESIDENTIAL BICYCLE PARKING TOTAL PROVIDED - LONG TERM	484
RESIDENTIAL BICYCLE PARKING TOTAL PROVIDED	**524**

RETAIL AND RESTAURANT BICYCLE PARKING REQUIREMENTS				
REQUIRED RATIO: LAMC 12.21 A.16 (a)(2)				
TYPE	SHORT TERM RATIO	REQ	LONG TERM RATIO	REQ
RESTAURANT (>1,000 SF)	1 PER 2,000 SF	8	1 PER 2,000 SF	8
RETAIL	1 PER 2,000 SF	5	1 PER 2,000 SF	5
SUBTOTAL		**13**		**13**
COMMERCIAL PARKING ADDITIONAL OFFSET SPACES				0
COMMERCIAL BICYCLE PARKING TOTAL - RETAIL AND RESTAURANT				**26**

COMMERCIAL BICYCLE PARKING TOTAL PROVIDED - SHORT TERM	13
COMMERCIAL BICYCLE PARKING TOTAL PROVIDED - LONG TERM	13
COMMERCIAL BICYCLE PARKING TOTAL PROVIDED	**26**

NORTH PARCEL PARKING

NORTH PARCEL PARKING - VEHICULAR PARKING TOTALS

RESIDENTIAL REQUIREMENTS							PROVIDED
	UNIT TYPE						
	LW	STUDIO	1 BR	2 BR	3 BR	TOTAL	
TOTAL UNITS	0	38	175	112	25	**350**	
MIX PERCENTAGE	1.4%	10.7%	49.3%	31.5%	7.0%	100%	
HABITABLE ROOMS	3	< 3	3	> 3	> 3		
PARKING RATIO (LAMC 12.21 A.4AB)	1.5	1.0	1.5	2.0	2.0		
TOTAL PARKING REQUIRED	8	38	263	224	50	**583**	
BIKE PARKING OFFSET (LAMC 12.21 A.4)					**10%**	58	
TOTAL PARKING REQUIRED AFTER OFFSET						**525**	**525**

RETAIL AND RESTAURANT REQUIREMENTS				PROVIDED
	RESTAURANT	RETAIL	TOTAL	
TOTAL AREA	8,000	5,000	13,000	
PARKING RATIO 12.21A4(x)(3)	2 SPACES PER 1,000 SF	2 SPACES PER 1,000 SF		
TOTAL PARKING REQUIRED	16	10	**26**	
BIKE PARKING OFFSET (LAMC 12.21 A.4)		**20%**	5	
TOTAL PARKING REQUIRED AFTER OFFSET			**21**	**21**

TOTAL PARKING REQUIRED (RESIDENTIAL, RETAIL AND RESTAURANT)		PROVIDED
TOTAL PARKING REQUIRED	609	
TOTAL PARKING REQUIRED AFTER OFFSET	**546**	**546**
STANDARD		438
COMPACT		24
TANDEM		84
STACKED		0

ELECTRONIC VEHICLE SPACES

REQUIRED EV SPACES RATIO: 30% OF TOTAL (LAMC 99.04.106.2.2.1; LAMC 99.05.106.5.3.1)
RESIDENTIAL REQUIRED EV CHARGING STATIONS RATIO: 10% OF TOTAL (99.04.106.2.2.1)
NON-RESIDENTIAL REQUIRED EV CHARGING STATIONS RATIO: 20% OF TOTAL (99.05.106.5.3.2)

RESIDENTIAL EV REQUIREMENTS		PROVIDED
REQUIRED EV SPACES	**158**	**158**
REQUIRED EV CHARGING STATIONS	**53**	**53**

RETAIL AND RESTAURANT EV REQUIREMENTS		PROVIDED
REQUIRED EV SPACES	**6**	**6**
REQUIRED EV CHARGING STATIONS	**4**	**4**

NORTH PARCEL - ADA SPACES

REQUIRED ACCESIBLE NON-EVCS TOTAL RATIO: (LABC 11B 208.2) 26-50 TOTAL SPACES: 2 51-75 TOTAL SPACES: 3 401 TO 500 TOTAL SPACES: 9 501 TO 1,000 TOTAL SAPCES: 2% OF TOTAL
REQUIRED ACCESSIBLE NON-EVCS VAN RATIO: (LABC 11B 502) 1 FOR EVERY 6 OR FRACTION THEREOF
REQUIRED ACCESSIBLE EVCS RATIOS: (LABC 11B208.3.2.1)

TOTAL EVCS AT FACILITY	VAN	STANDARD	AMBULATORY
1-4	1	0	0
5-25	1	1	0
26-50	1	1	1
51-75	1	2	3
76-100	1	3	3
101+	1, PLUS 1 FOR EACH 300, OR FRACTION THEREOF, OVER 100	3, PLUS 1 FOR EACH 60, OR FRACTION THEREOF, OVER 100	3, PLUS 1 FOR EACH 50, OR FRACTION THEREOF, OVER 100

RESIDENTIAL ADA REQUIREMENTS		PROVIDED
ADA - STANDARD	9	
ADA - VAN	2	
TOTAL ADA - NON-EVCS	**11**	
ADA - EV - STANDARD	3	
ADA - EV - VAN	1	
ADA - EV - AMBULATORY	2	
TOTAL ADA - EVCS	**6**	
TOTAL ADA - RESIDENTIAL	**17**	**17**

RETAIL AND RESTAURANT ADA REQUIREMENTS		PROVIDED
ADA - STANDARD	1	
ADA - VAN	1	
TOTAL ADA - NON-EVCS	**2**	
ADA - EV - STANDARD	0	
ADA - EV - VAN	1	
ADA - EV - AMBULATORY	0	
TOTAL ADA - EVCS	**1**	
TOTAL ADA - RETAIL AND RESTAURANT	**3**	**3**

NORTH PARCEL - BICYCLE PARKING

RESIDENTIAL BICYCLE PARKING REQUIREMENTS				
REQUIRED RATIO: LAMC 12.21 A.16 (a)(1)(i)				
DWELLING UNITS	SHORT TERM RATIO	REQ	LONG TERM RATIO	REQ
1-25	1 PER 10 UNITS	3	1 PER UNIT	25
26-100	1 PER 15 UNITS	5	1 PER 1.5 UNITS	50
101-200	1 PER 20 UNITS	5	1 PER 2 UNITS	50
201+	1 PER 40 UNITS	4	1 PER 4 UNITS	39
SUBTOTAL		**17**		**164**
RESIDENTIAL PARKING ADDITIONAL OFFSET SPACES				52
RESIDENTIAL BICYCLE PARKING TOTAL REQUIRED				**232**

RESIDENTIAL BICYCLE PARKING TOTAL PROVIDED - SHORT TERM	29
RESIDENTIAL BICYCLE PARKING TOTAL PROVIDED - LONG TERM	212
RESIDENTIAL BICYCLE PARKING TOTAL PROVIDED	**232**

RETAIL AND RESTAURANT BICYCLE PARKING REQUIREMENTS				
REQUIRED RATIO: LAMC 12.21 A.16 (a)(2)				
TYPE	SHORT TERM RATIO	REQ	LONG TERM RATIO	REQ
RESTAURANT (>1,000 SF)	1 PER 2,000 SF	4	1 PER 2,000 SF	4
RETAIL	1 PER 2,000 SF	3	1 PER 2,000 SF	3
SUBTOTAL		**7**		**7**
COMMERCIAL PARKING ADDITIONAL OFFSET SPACES				6
COMMERCIAL BICYCLE PARKING TOTAL - RETAIL AND RESTAURANT				**29**

COMMERCIAL BICYCLE PARKING TOTAL PROVIDED - SHORT TERM	7
COMMERCIAL BICYCLE PARKING TOTAL PROVIDED - LONG TERM	13
COMMERCIAL BICYCLE PARKING TOTAL PROVIDED	**29**

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NOT FOR CONSTRUCTION

REVISIONS

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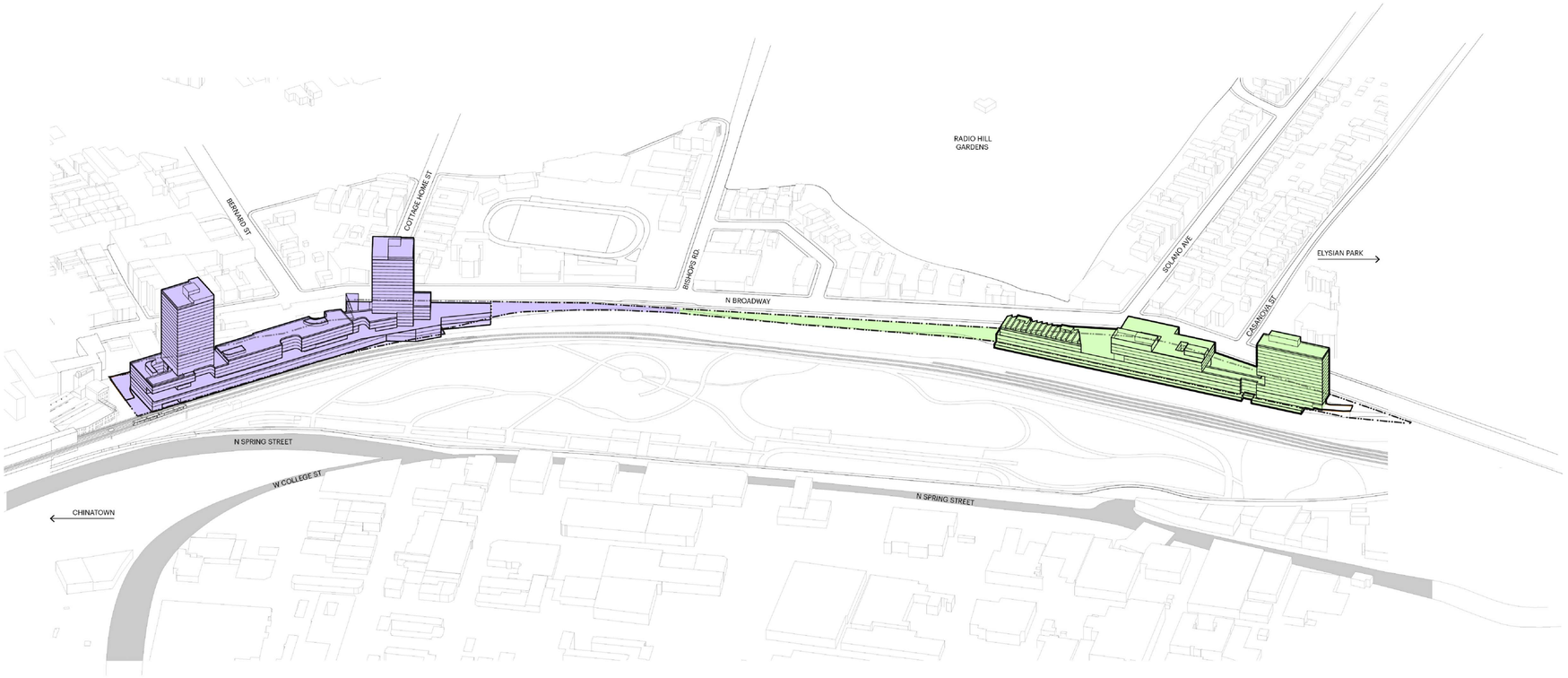
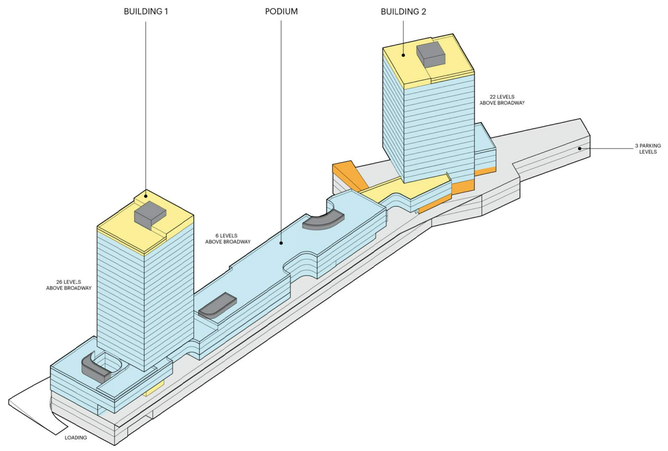


MASSING DIAGRAM 2

LEGEND

- SOUTH PARCEL
- NORTH PARCEL



SOUTH PARCEL

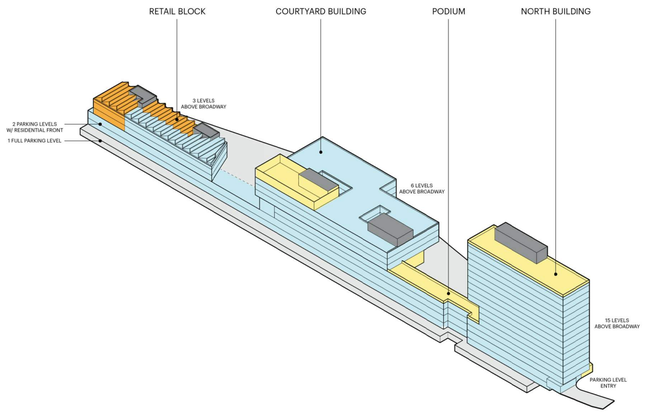
1. BUILDING 1
231 DWELLING UNITS
246,570 SF RESIDENTIAL
26 STORIES (22 LEVELS ABOVE 4-LEVEL PODIUM)

2. PODIUM
216 DWELLING UNITS
260,095 SF RESIDENTIAL
20,000 SF RESTAURANT/ RETAIL
5,800 SF EXTERIOR RESTAURANT AREA
6 STORIES

3. BUILDING 2
184 DWELLING UNITS
200,189 SF RESIDENTIAL
22 STORIES (18 LEVELS ABOVE 4-LEVEL PODIUM)

SOUTH PARCEL TOTAL
631 DWELLING UNITS
RESIDENTIAL AREA: 706,854 SF
LANDSCAPE TRELLIS/ OVERHANG: 51,134 SF
RESTAURANT/ RETAIL AREA: 20,000 SF
EXTERIOR RESTAURANT AREA: 5,800 SF

TOTAL SOUTH PARCEL AREA: 783,788 SF



NORTH PARCEL

4. RETAIL BLOCK
18 DWELLING UNITS
13,688 SF RESIDENTIAL
10,000 SF RESTAURANT/ RETAIL
3 STORIES (+2 RESIDENTIAL LEVELS LINING P1+P2)

5. COURTYARD BUILDING
135 DWELLING UNITS
127,702 SF RESIDENTIAL
6 STORIES (+2 RESIDENTIAL LEVELS LINING P1+P2)

6. PODIUM
58 DWELLING UNITS
85,250 SF RESIDENTIAL
2 STORIES (+2 RESIDENTIAL LEVELS LINING P1+P2)

7. NORTH BUILDING
144 DWELLING UNITS
156,632 SF RESIDENTIAL
15 STORIES (+2 RESIDENTIAL LEVELS LINING P1+P2)

NORTH PARCEL TOTAL
355 DWELLING UNITS
RESIDENTIAL AREA: 383,272 SF
LANDSCAPE TRELLIS/ OVERHANG: 65,129 SF
RESTAURANT/ RETAIL AREA: 10,000 SF
EXTERIOR RESTAURANT AREA: 3,000 SF

TOTAL SOUTH PARCEL AREA: 461,401 SF

MASSING DIAGRAM 1

LEGEND

- RESIDENTIAL
- RETAIL
- AMENITY / LOBBY
- PARKING

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- PARKING

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REQUIRED FRONT YARD SETBACK

COMMERCIAL USES = NOT REQUIRED

RESIDENTIAL USES = NOT REQUIRED

RESIDENTIAL SETBACK SUMMARY

SIDE YARD SETBACK N/A

RETAIL BLOCK

ABOVE BROADWAY: 1 ROOF MECHANICAL STORY + 2 RESIDENTIAL STORIES = 3 STORIES
BELOW BROADWAY: 2RESIDENTIAL STORIES + 1 PARKING STORY = 3 STORIES

>PROVIDED FRONT YARD(FY) SETBACK = 20' MIN.

COURTYARD BUILDING

ABOVE BROADWAY: 1 ROOF MECHANICAL STORY + 5 RESIDENTIAL STORIES = 6 STORIES
BELOW BROADWAY: 2 RESIDENTIAL STORIES + 1 PARKING STORIES = 3 STORIES

>PROVIDED FRONT YARD(FY) SETBACK = 10' MIN.

PODIUM

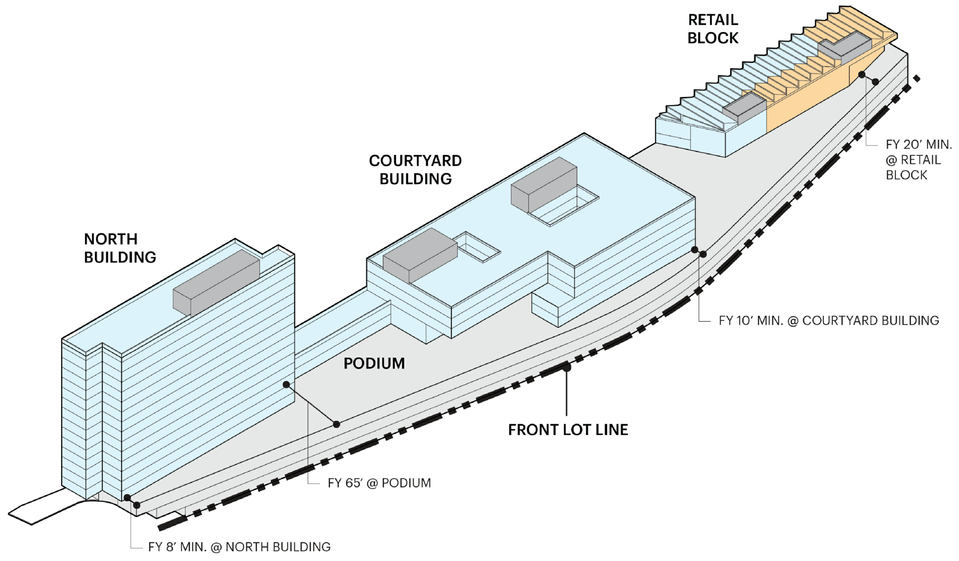
ABOVE BROADWAY: 2 RESIDENTIAL STORIES = 2
BELOW BROADWAY: 2 RESIDENTIAL STORIES + 1 PARKING STORIES = 3 STORIES

>PROVIDED FRONT YARD(FY) SETBACK = 65' MIN.

NORTH BUILDING

ABOVE BROADWAY: 1 ROOF MECHANICAL STORY + 14 RESIDENTIAL STORIES (ABOVE BROADWAYS) = 15 STORIES
BELOW BROADWAY: 2 RESIDENTIAL STORIES + 1 PARKING STORIES = 3 STORIES

>PROVIDED FRONT YARD(FY) SETBACK = 8' MIN.



SETBACKS DIAGRAM - NORTH PARCEL 4

REQUIRED REAR YARD SETBACK

COMMERCIAL USES = NOT REQUIRED

RESIDENTIAL USES = 15'+1' FOR EACH STORY OVER THIRD STORY, 20' MAXIMUM

RESIDENTIAL SETBACK SUMMARY

SIDE YARD SETBACK N/A

RETAIL BLOCK

ABOVE BROADWAY: 1 ROOF MECHANICAL STORY + 2 RESIDENTIAL STORIES = 3 STORIES
BELOW BROADWAY: 2 RESIDENTIAL STORIES + 1 PARKING STORY = 3 STORIES

>PROVIDED REAR YARD(RY) SETBACK = 16' MIN.

COURTYARD BUILDING

ABOVE BROADWAY: 1 ROOF MECHANICAL STORY + 5 RESIDENTIAL STORIES = 6 STORIES
BELOW BROADWAY: 2 RESIDENTIAL STORIES + 1 PARKING STORIES = 3 STORIES

>PROVIDED REAR YARD(RY) SETBACK = 16' MIN.

PODIUM

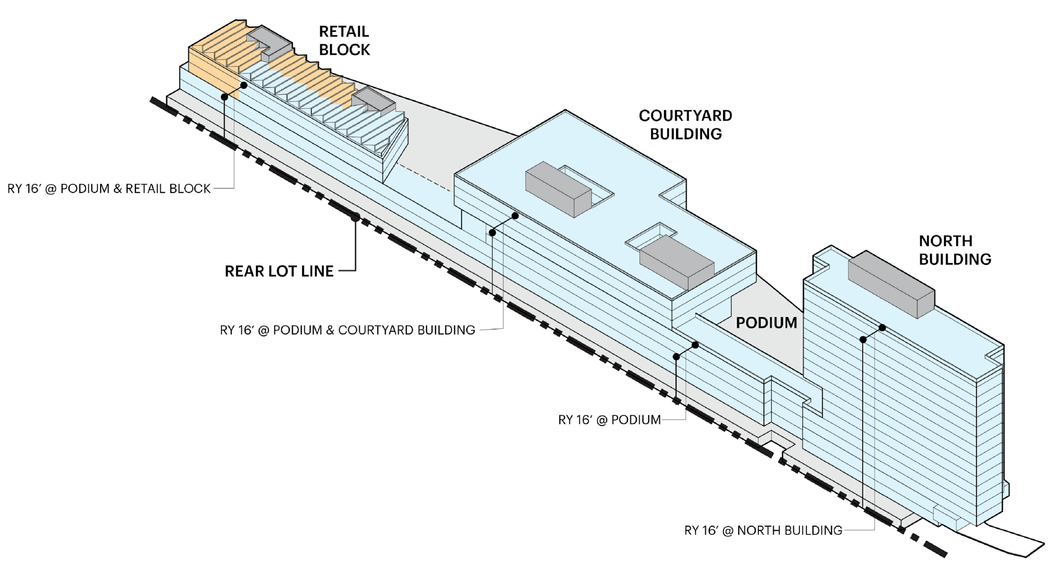
ABOVE BROADWAY: 2 RESIDENTIAL STORIES = 2
BELOW BROADWAY: 2 RESIDENTIAL STORIES + 1 PARKING STORIES = 3 STORIES

>PROVIDED REAR YARD(RY) SETBACK = 16' MIN.

NORTH BUILDING

ABOVE BROADWAY: 1 ROOF MECHANICAL STORY + 14 RESIDENTIAL STORIES (ABOVE BROADWAYS) = 15 STORIES
BELOW BROADWAY: 2 RESIDENTIAL STORIES + 1 PARKING STORIES = 3 STORIES

>PROVIDED REAR YARD(RY) SETBACK = 16' MIN.



SETBACKS DIAGRAM - NORTH PARCEL 3

REQUIRED FRONT YARD SETBACK

COMMERCIAL USES = NOT REQUIRED

RESIDENTIAL USES = NOT REQUIRED

REQUIRED SIDE YARD SETBACK

COMMERCIAL USES = NOT REQUIRED

RESIDENTIAL USES = 5'+1' FOR EACH STORY OVER SECOND STORY, 16' MAXIMUM

RESIDENTIAL SETBACK SUMMARY

BUILDING 1

ABOVE BROADWAY: 1 ROOF MECHANICAL STORY + 25 RESIDENTIAL STORIES = 26 STORIES
BELOW BROADWAY: 3 PARKING STORIES

>PROVIDED FRONT YARD(FY) SETBACK = 17' MIN.
>PROVIDED SIDE YARD(SY) SETBACK = 28' MIN.

PODIUM

ABOVE BROADWAY: 1 ROOF MECHANICAL STORY + 4-5 RESIDENTIAL STORIES = 5-6 STORIES
BELOW BROADWAY: 3 PARKING STORIES

>PROVIDED REAR YARD(RY) SETBACK = 17' MIN.
>PROVIDED SIDE YARD(SY) SETBACK = 28' MIN.

BUILDING 2

ABOVE BROADWAY: 1 ROOF MECHANICAL STORY + 21 RESIDENTIAL STORIES = 22 STORIES
BELOW BROADWAY: 3 PARKING STORIES

>PROVIDED FRONT YARD(FY) SETBACK = 17' MIN.
>PROVIDED SIDE YARD(SY) SETBACK = N/A - NOT ADJACENT TO SIDE LOT LINE

RETAIL

ABOVE BROADWAY: 1 RETAIL STORY
BELOW BROADWAY: 3 PARKING STORIES

>PROVIDED FRONT YARD(FY) SETBACK = 17' MIN.
>PROVIDED SIDE YARD(SY) SETBACK = N/A - NOT ADJACENT TO SIDE LOT LINE

REQUIRED SIDE YARD SETBACK

COMMERCIAL USES = NOT REQUIRED

RESIDENTIAL USES = 5'+1' FOR EACH STORY OVER SECOND STORY, 16' MAXIMUM

REQUIRED REAR YARD SETBACK

COMMERCIAL USES = NOT REQUIRED

RESIDENTIAL USES = 15'+1' FOR EACH STORY OVER THIRD STORY, 20' MAXIMUM

RESIDENTIAL SETBACK SUMMARY

BUILDING 1

ABOVE BROADWAY: 1 ROOF MECHANICAL STORY + 25 RESIDENTIAL STORIES = 26 STORIES
BELOW BROADWAY: 3 PARKING STORIES

>PROVIDED REAR YARD(RY) SETBACK = 25' MIN.
>PROVIDED SIDE YARD(SY) SETBACK = 28' MIN.

PODIUM

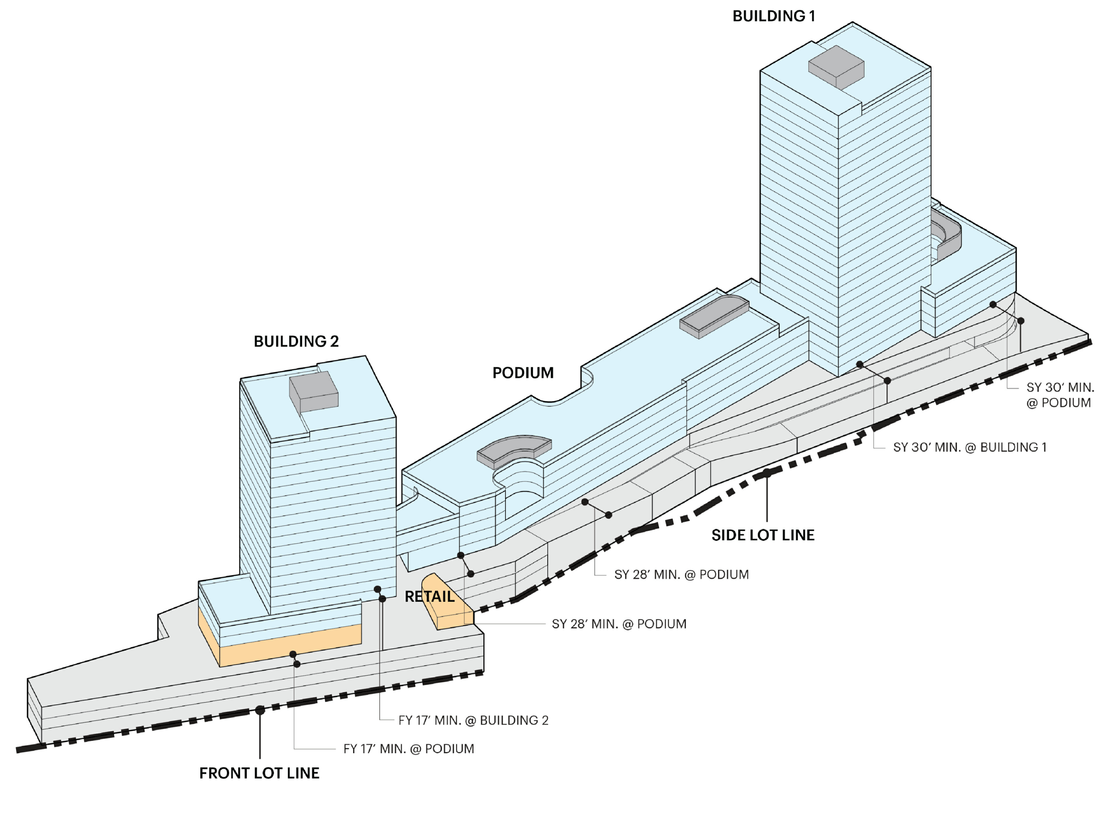
ABOVE BROADWAY: 1 ROOF MECHANICAL STORY + 4-5 RESIDENTIAL STORIES = 5-6 STORIES
BELOW BROADWAY: 3 PARKING STORIES

>PROVIDED REAR YARD(RY) SETBACK = 10' MIN.
>PROVIDED SIDE YARD(SY) SETBACK = 28' MIN.

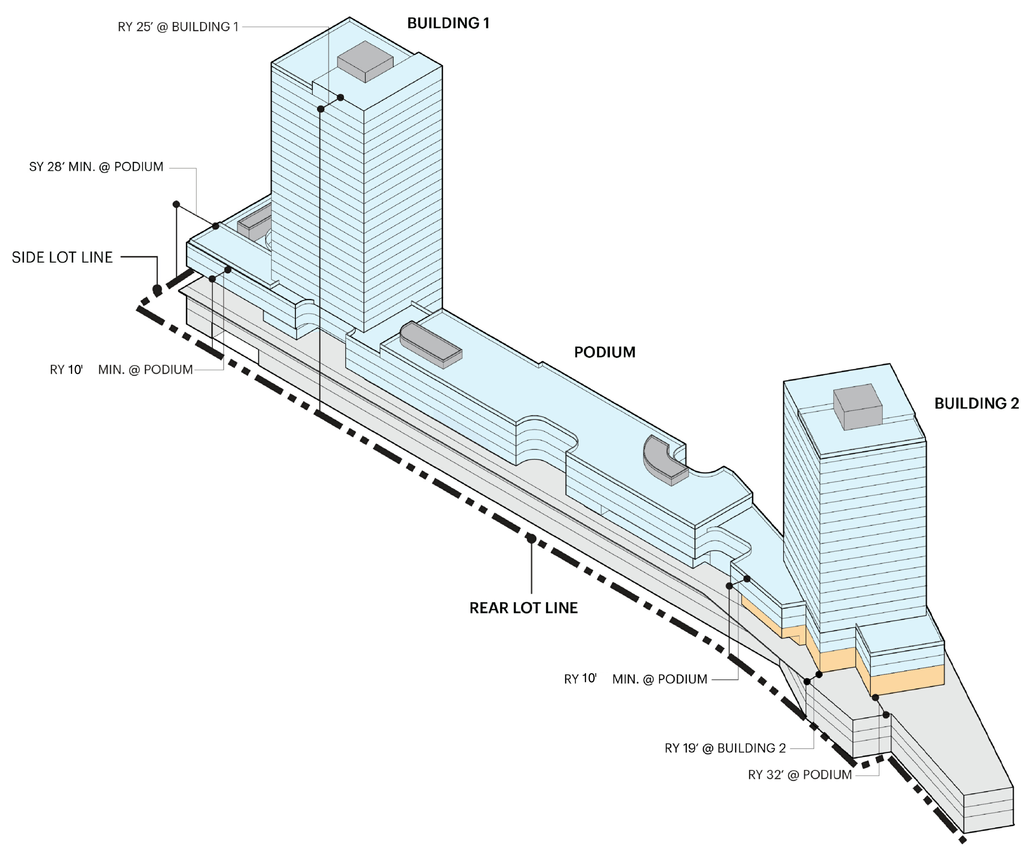
BUILDING 2

ABOVE BROADWAY: 1 ROOF MECHANICAL STORY + 21 RESIDENTIAL STORIES = 22 STORIES
BELOW BROADWAY: 3 PARKING STORIES

>PROVIDED REAR YARD(RY) SETBACK = 19' MIN.
>PROVIDED SIDE YARD(SY) SETBACK = N/A - NOT ADJACENT TO SIDE LOT LINE



SETBACKS DIAGRAM - SOUTH PARCEL 2



SETBACKS DIAGRAM - SOUTH PARCEL 1

REVISIONS

ISSUE		
ENTITLEMENT		07/01/2024

DRAWING TITLE: DIAGRAMS - SETBACKS

SCALE: N/A (WHEN PRINTED ON 30"X42" SHEET)

DRAWING NO.: G0.11

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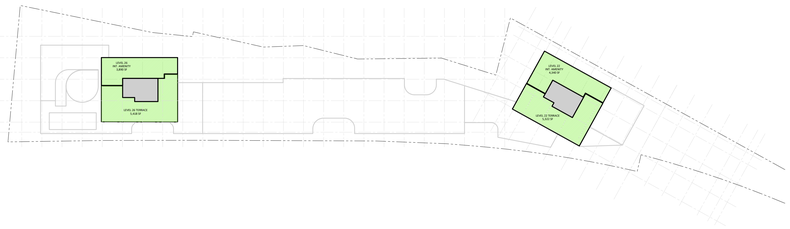
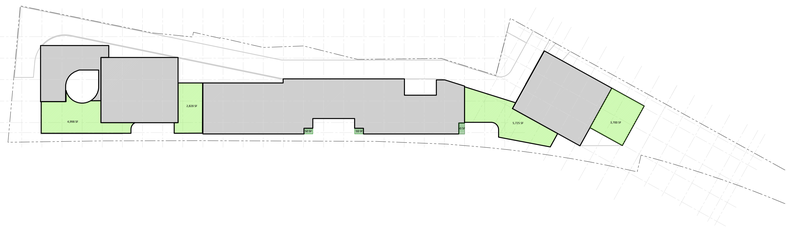
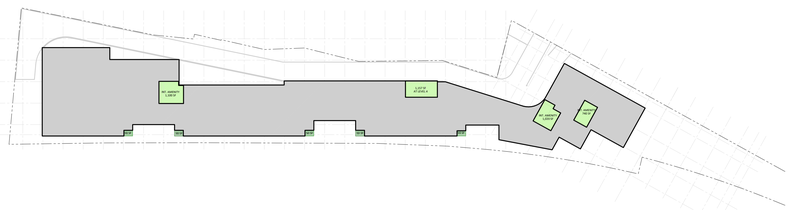


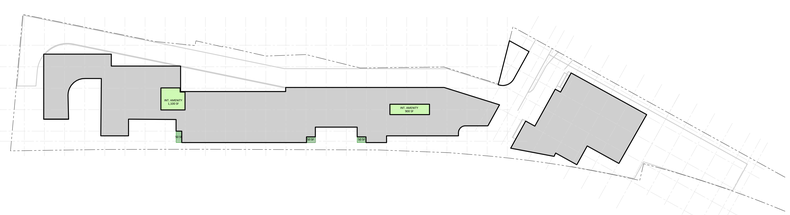
SOUTH PARCEL FLOOR PLAN - TERRACES 9
1" = 80'



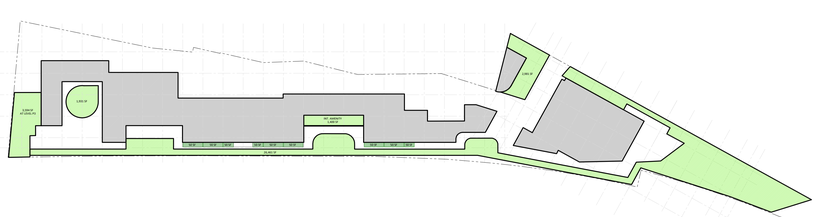
SOUTH PARCEL FLOOR PLAN - L5 8
1" = 80'



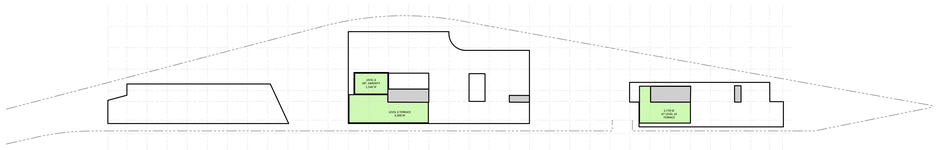
SOUTH PARCEL FLOOR PLAN - L3-4 7
1" = 80'



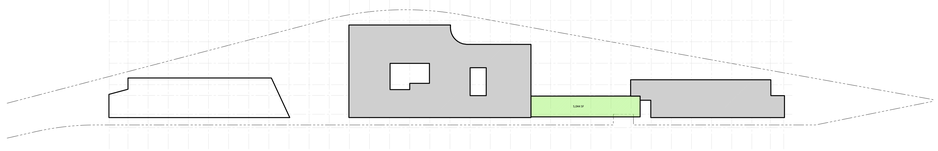
SOUTH PARCEL FLOOR PLAN - L2 6
1" = 80'



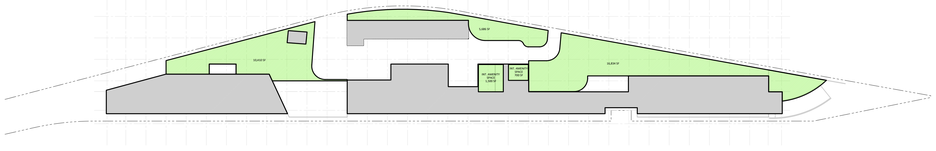
SOUTH PARCEL FLOOR PLAN - L1 5
1" = 80'



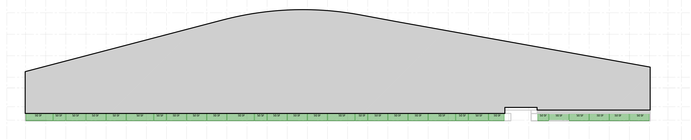
NORTH PARCEL FLOOR PLAN - TERRACES 4
1" = 80'



NORTH PARCEL FLOOR PLAN - L3 3
1" = 80'



NORTH PARCEL FLOOR PLAN - L1 2
1" = 80'



NORTH PARCEL FLOOR PLAN - P2 1
1" = 80'

OPEN SPACE AREAS - SOUTH PARCEL
(LAMC 12.21G)

OPEN SPACE - REQUIRED

UNIT TYP	HABITABLE ROOMS	OPEN SPACE REQ. PER UNIT	TOTAL UNITS	TOTAL OPEN SPACE REQ. (SF)
STUDIO	< 3	100	106	10,600
1 BEDROOM	< 3	100	293	29,300
2 BEDROOM	3	125	195	24,375
3 BEDROOM	> 3	175	35	6,125
LIVE WORK	< 3	100	2	200
TOTAL OPEN SPACE - REQUIRED			**631**	**70,600**
TOTAL COMMON OPEN SPACE - REQUIRED (50% OF TOTAL OPEN SPACE)				**35,300**
TOTAL OPEN SPACE - INTERIOR AMENITY ALLOWABLE				**17,650**

OPEN SPACE - PROPOSED

TYPE	TOTAL AREA (SF)
PUBLICLY ACCESSIBLE OPEN SPACE	
GROUND LEVEL PUBLIC COURTYARDS	31,373
LEVEL P-3 PLAZA	3,594
PUBLICLY ACCESSIBLE OPEN SPACE SUBTOTAL	34,967
RESIDENTIAL COMMON OPEN SPACE	
GROUND LEVEL - INTERIOR AMENITIES	1,400
LEVEL 2 - INTERIOR AMENITIES	2,000
LEVEL 3, LEVEL 4 - INTERIOR AMENITIES	5,720
LEVEL 4 TERRACES	1,157
LEVEL 5 TERRACES	17,291
LEVEL 22 TERRACES	5,322
LEVEL 22 - INTERIOR AMENITIES	4,340
LEVEL 26 TERRACES	5,418
LEVEL 26 - INTERIOR AMENITIES	3,890
RESIDENTIAL COMMON OPEN SPACE SUBTOTAL	46,498
PRIVATE OPEN SPACE	
GROUND LEVEL PRIVATE TERRACES	450
LEVEL 2 - PRIVATE TERRACES	150
LEVEL 3, LEVEL 4 - PRIVATE TERRACES	500
LEVEL 5 - PRIVATE TERRACES	150
PRIVATE OPEN SPACE SUBTOTAL	1,250
SOUTH PARCEL TOTAL OPEN SPACE	**82,715**
OPEN SPACE REQUIRED PER LAMC 12.21 G.2	**70,600**

PLANTING AND TREE REQUIREMENTS

PLANTING REQUIREMENT (SF)	
LAMC 12.21.G.2.a.3: A minimum of 25% of the common open space area shall be planted with ground cover, shrubs or trees.	
TOTAL PLANTED OPEN SPACE - REQUIRED	**8,825**
GROUND LEVEL	7,854
L-2 TERRACES	463
L-5 TERRACES	2,959
L-22 TERRACE	679
L-26 TERRACE	701
TOTAL PLANTED OPEN SPACE - PROPOSED	**17,236**
TREE REQUIREMENT (QTY)	
LAMC 12.21.G.2.a.3: At least one 24-inch box tree for every four dwelling units shall be provided on site	
Unprotected street trees will be replaced by the Department of Public Works' Tree Replacement Policy of "2x1"	
The project is not removing any trees protected under the City's Protected Tree and Shrubs Ordinance No. 186 873	
TOTAL TREES - REQUIRED	**158**
TOTAL TREES - PROPOSED ON SOUTH PARCEL	**110**
TOTAL TREES - PROPOSED ON STREET SCAPE	**62**
TOTAL TREES - PROPOSED	**172**

OPEN SPACE AREAS - NORTH PARCEL
(LAMC 12.21G)

OPEN SPACE - REQUIRED

UNIT TYP	HABITABLE ROOMS	OPEN SPACE REQ. PER UNIT	TOTAL UNITS	TOTAL OPEN SPACE REQ. (SF)
STUDIO	< 3	100	38	3,800
1 BEDROOM	< 3	100	175	17,500
2 BEDROOM	3	125	112	14,000
3 BEDROOM	> 3	175	25	4,375
LIVE WORK	< 3	100	5	500
TOTAL OPEN SPACE - REQUIRED			**355**	**40,175**
TOTAL COMMON OPEN SPACE - REQUIRED (50% OF TOTAL OPEN SPACE)				**20,088**
TOTAL OPEN SPACE - INTERIOR AMENITY ALLOWABLE				**10,044**

OPEN SPACE - PROPOSED

TYPE	TOTAL AREA (SF)
PUBLICLY ACCESSIBLE OPEN SPACE	
GROUND LEVEL PUBLIC COURTYARDS	10,410
PUBLICLY ACCESSIBLE OPEN SPACE SUBTOTAL	10,410
RESIDENTIAL COMMON OPEN SPACE	
GROUND LEVEL RESIDENTIAL COURTYARDS	22,520
GROUND LEVEL - INTERIOR AMENITIES	2,200
LEVEL 3 TERRACES	5,044
LEVEL 6 TERRACES	4,300
LEVEL 6 - INTERIOR AMENITIES	1,540
LEVEL 14 TERRACES	2,770
RESIDENTIAL COMMON OPEN SPACE SUBTOTAL	38,374
PRIVATE OPEN SPACE	
LEVEL P-2 PRIVATE BALCONY TERRACES	1,450
PRIVATE OPEN SPACE SUBTOTAL	1,450
NORTH PARCEL TOTAL OPEN SPACE	**50,234**
OPEN SPACE REQUIRED PER LAMC 12.21 G.2	**40,175**

PLANTING AND TREE REQUIREMENTS

PLANTING REQUIREMENT (SF)	
LAMC 12.21.G.2.a.3: A minimum of 25% of the common open space area shall be planted with ground cover, shrubs or trees.	
TOTAL PLANTED OPEN SPACE - REQUIRED	**5,022**
TOTAL PLANTED OPEN SPACE - PROPOSED	**12,736**
TREE REQUIREMENT (QTY)	
LAMC 12.21.G.2.a.3: At least one 24-inch box tree for every four dwelling units shall be provided on site	
Unprotected street trees will be replaced by the Department of Public Works' Tree Replacement Policy of "2x1"	
The project is not removing any trees protected under the City's Protected Tree and Shrubs Ordinance No. 186 873	
TOTAL TREES - REQUIRED	**89**
TOTAL TREES - PROPOSED ON NORTH PARCEL	**102**
TOTAL TREES - PROPOSED ON STREET SCAPE	**48**
TOTAL TREES - PROPOSED	**150**

LEGEND

- OPEN SPACE - COMMON
- OPEN SPACE - PRIVATE

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ISSUES		
	ENTITLEMENT	**07/01/2024**

DRAWING TITLE
PLANS - OPEN SPACE

SCALE
1"=80'
WHEN PRINTED ON 30"x42" SHEET

DRAWING NO.
G0.12

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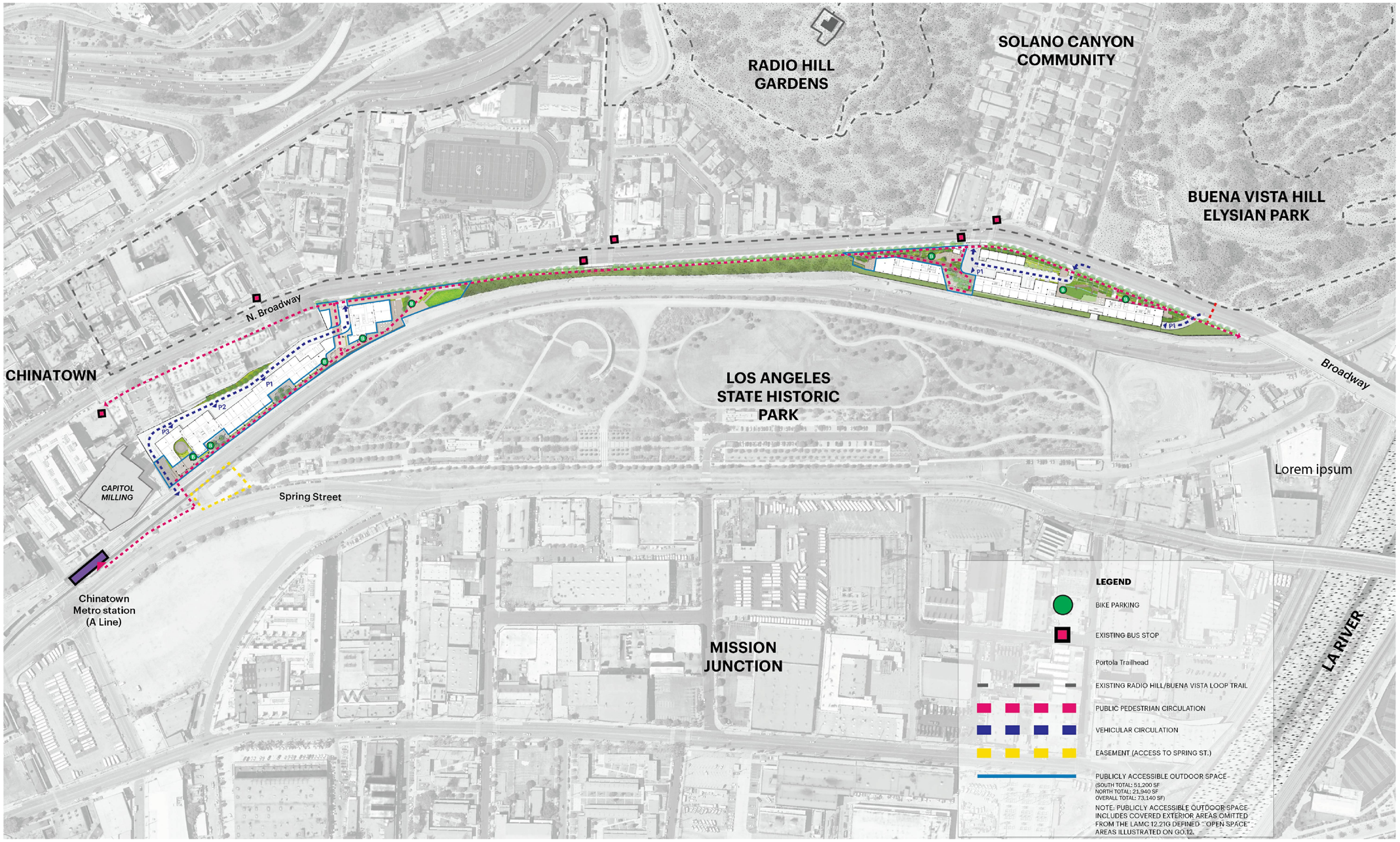

SITE ACCESS PLAN 1
1/32" = 1'-0"

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DRAWING TITLE PLANS - SITE ACCESS

SCALE AS NOTE 1/32"=1'-0"
WHEN PRINTED ON 30"x42" SHEETS

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PERSPECTIVE VIEW - CAPITOL MILLING ADJACENCY (SOUTH) 3



PERSPECTIVE VIEW - NEIGHBORHOOD RETAIL PLAZA (NORTH) 2



PERSPECTIVE VIEW - SITE 1

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DRAWING TITLE PERSPECTIVE VIEWS

SCALE N/A WHEN PRINTED ON 30"x42" SHEET

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PERSPECTIVE VIEW - CHINATOWN METRO STATION ADJACENCY (SOUTH) 2



PERSPECTIVE VIEW - BOARDWALK (SOUTH) 1

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DRAWING TITLE
PERSPECTIVE VIEWS

SCALE N/A DATE

DRAWING NO.
G0.21

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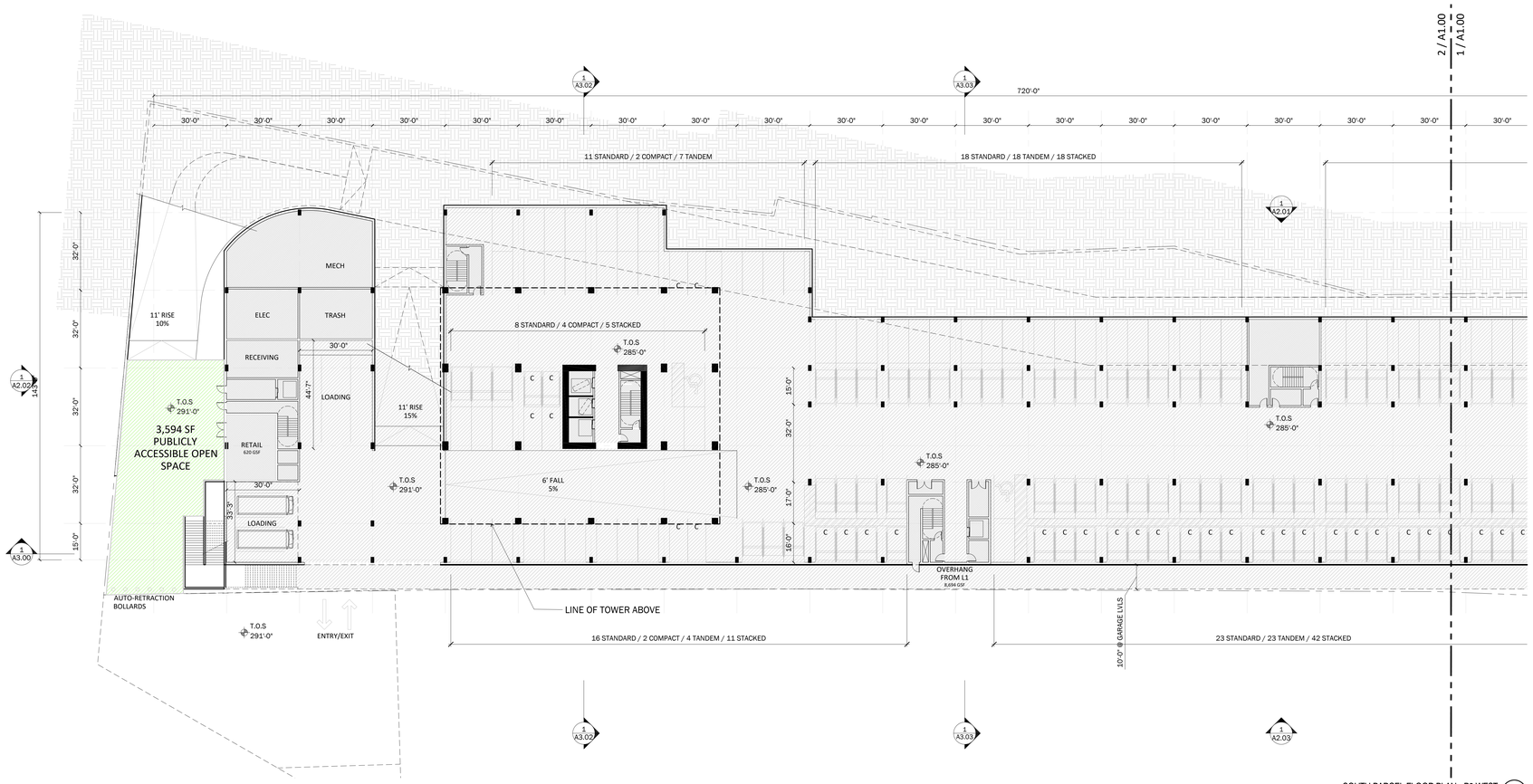


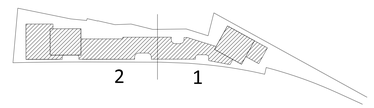
KEYPLAN: SITE

1" = 500'



KEYPLAN: SOUTH PARCEL

1" = 200'



LEGEND

PUBLICLY ACCESSIBLE
OPEN SPACE

NOTES

NORTH

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PLAN - SOUTH - P3
OPEN SPACE

SCALE: 1" = 20'

DRAWING NO.: G0.30

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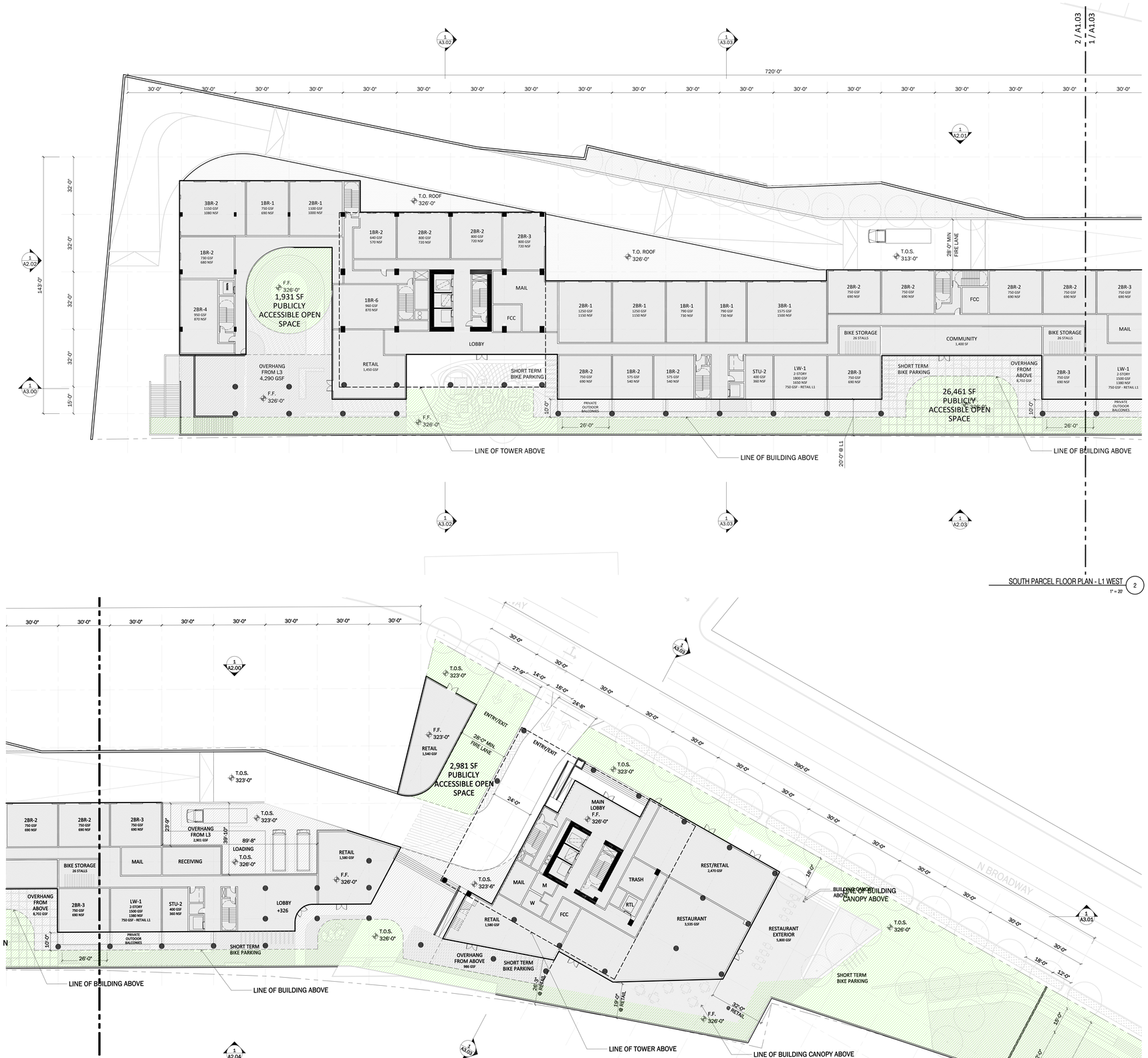


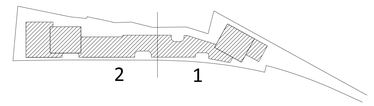
SOUTH PARCEL FLOOR PLAN - L1 WEST 2
1" = 20'

SOUTH PARCEL FLOOR PLAN - L1 EAST 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



LEGEND

PUBLICLY ACCESSIBLE OPEN SPACE

NOTES

NORTH

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PLAN - SOUTH - L1 OPEN SPACE

SCALE 1" = 20'

DRAWING NO. G0.31

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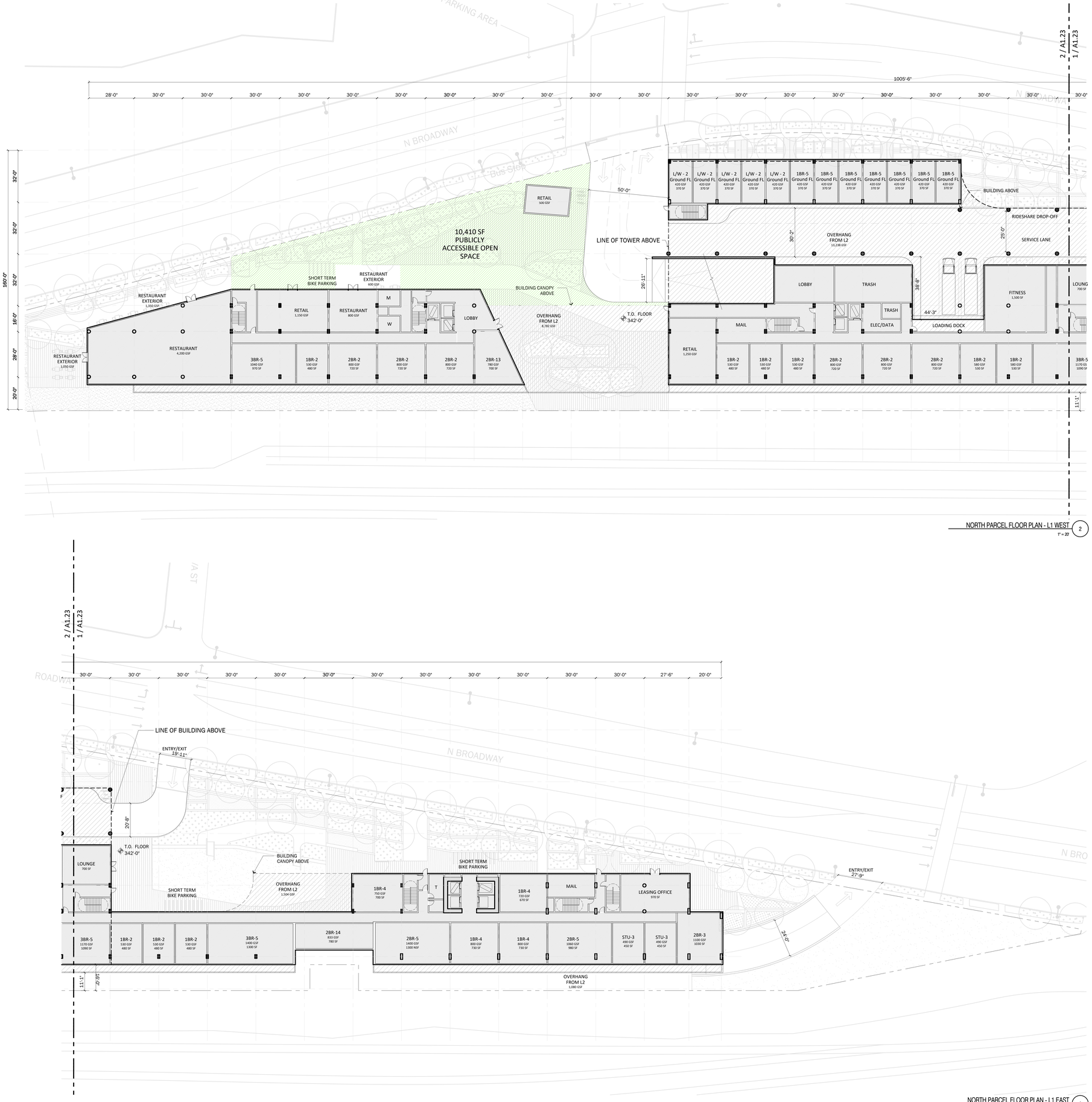


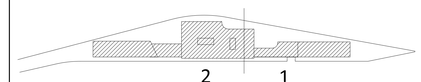
NORTH PARCEL FLOOR PLAN - L1 WEST (2)
1" = 20'

NORTH PARCEL FLOOR PLAN - L1 EAST (1)
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



LEGEND

PUBLICLY ACCESSIBLE
OPEN SPACE

NOTES

NORTH

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ENTITLEMENT 07/01/2024

DRAWING TITLE: PLAN - NORTH - L1 OPEN SPACE

SCALE: 1" = 20' WHEN PRINTED ON 30"x42" SHEET

DRAWING NO.: G0.32

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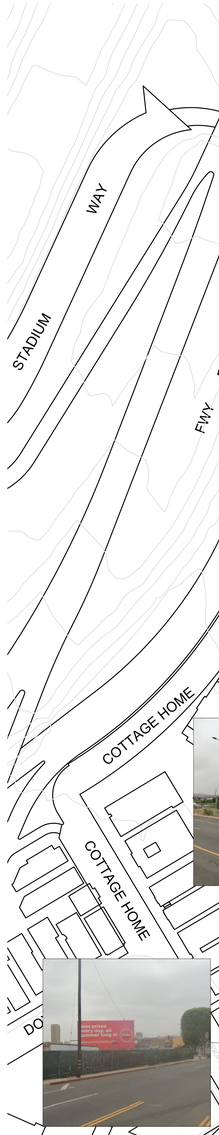










BILLBOARD MISSING FROM SURVEY









KEY

- BILLBOARDS (EXISTING TO DEMO)
- BILLBOARDS (EXISTING MAY REMAIN)
- CURB CUTS (EXISTING TO DEMO)
- BUS STOP (EXISTING)
- BUILDINGS / CONCRETE PADS (EXISTING TO DEMO)
- POWER POLE / LIGHT (EXISTING)

SITE PLAN - EXISTING ELEMENTS 1
1" = 80'

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1	ENTITLEMENT	07/01/2024

DRAWING TITLE: SITE PLAN - EXISTING ELEMENTS

SCALE: 1"=80'
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DRAWING NO.: AS1.00

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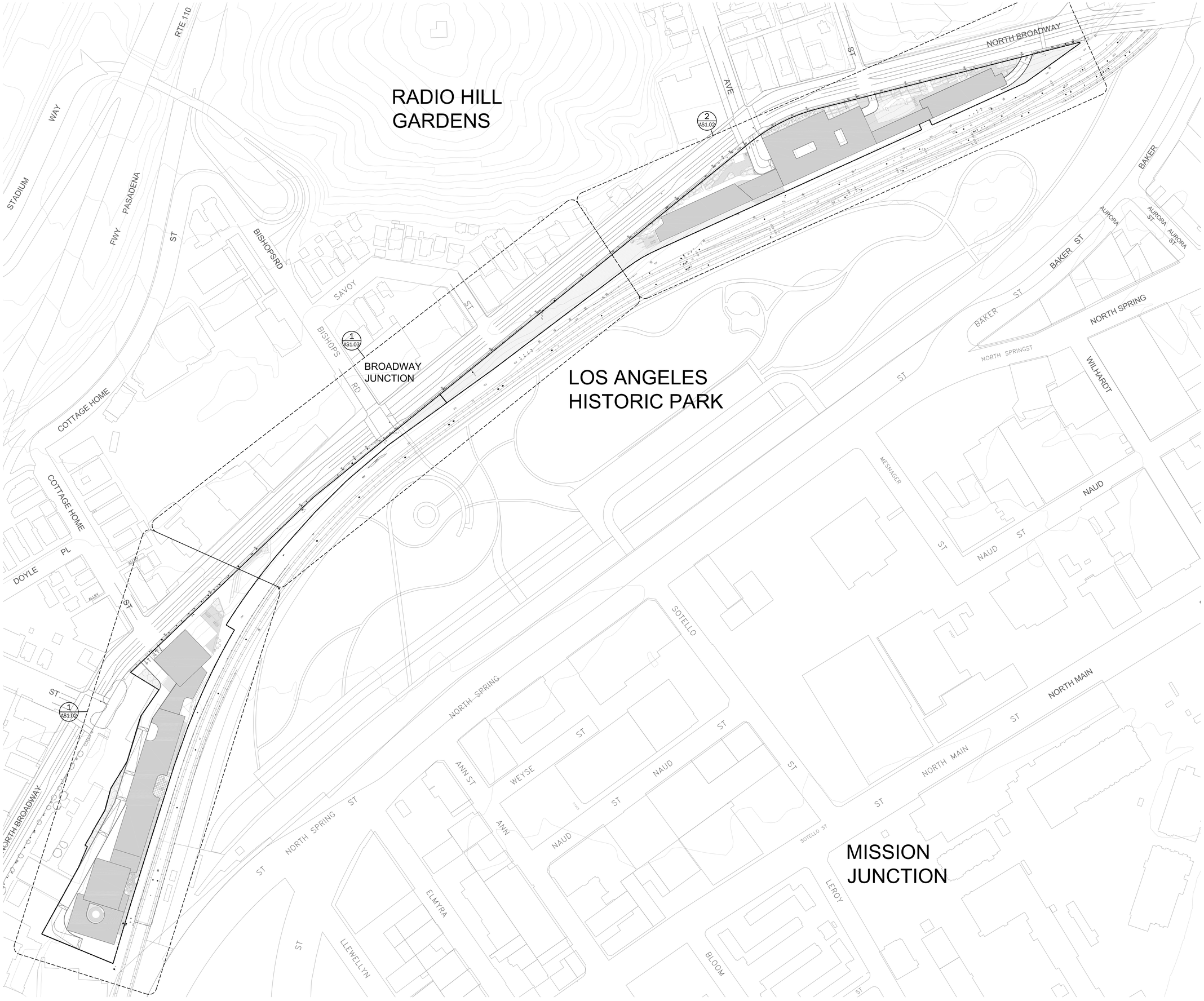

PLOT PLAN 1
1" = 80'

NORTH

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	ENTITLEMENT	07/01/2024

PLOT PLAN

DATE

SCALE 1"=80' WHEN PRINTED ON 30"X42" SHEETS

DRAWING NO. AS1.01

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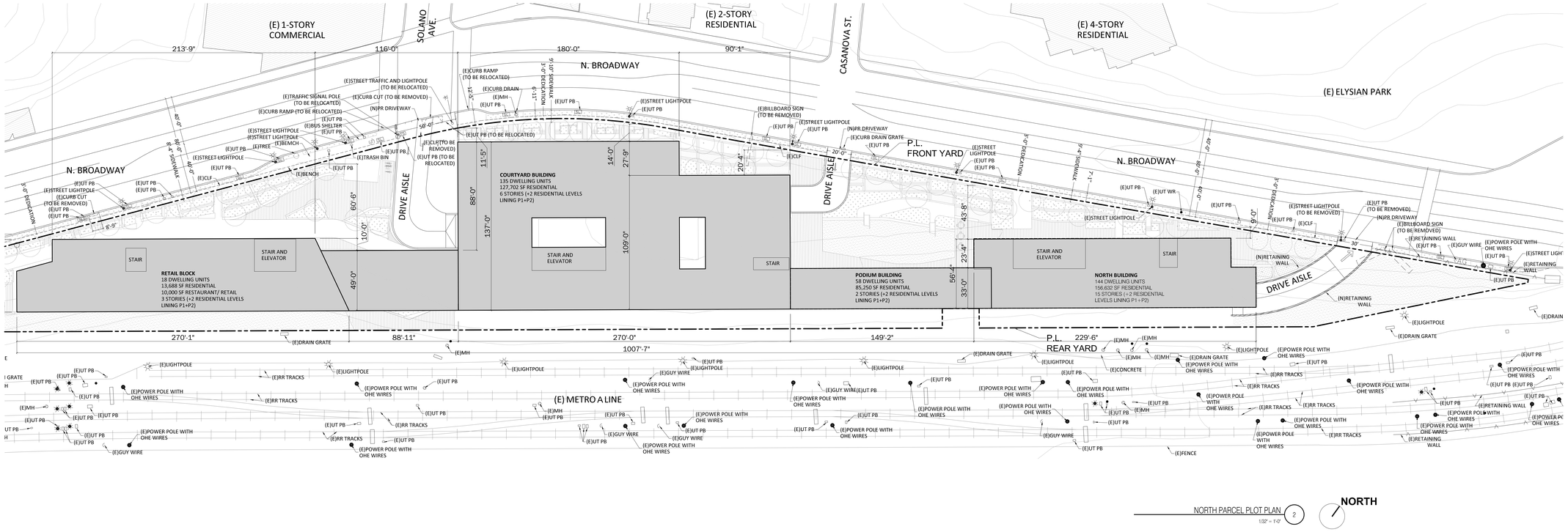
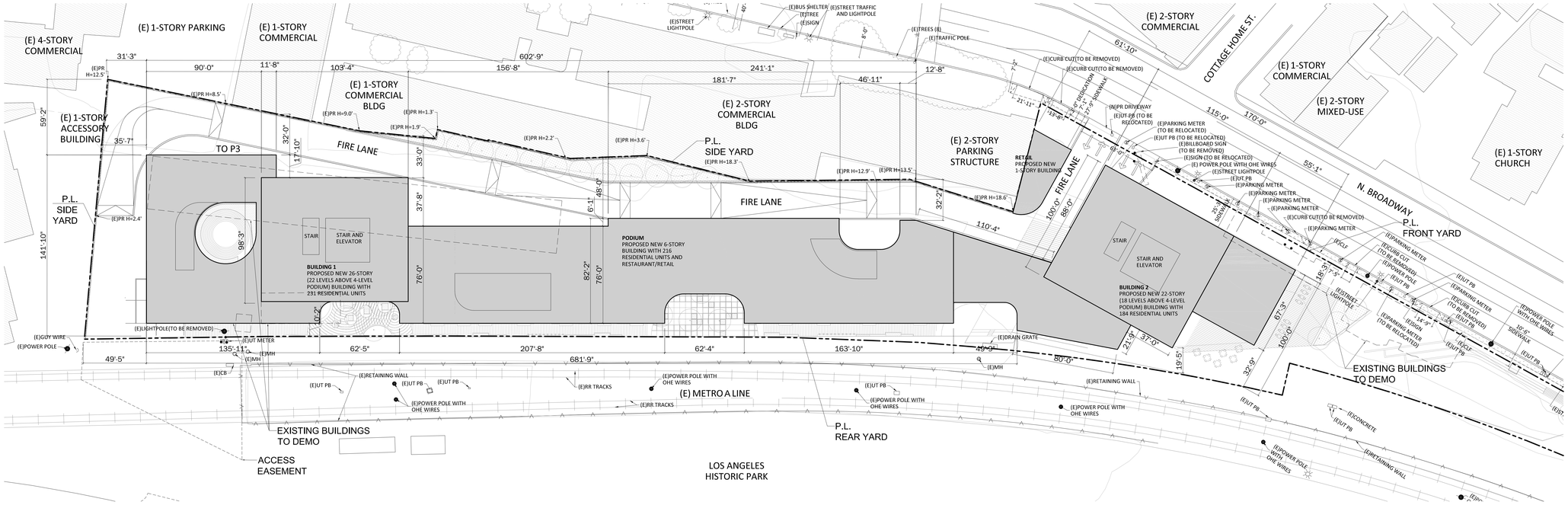


NORTH PARCEL PLOT PLAN 2
1/32" = 1'-0"

NORTH



SOUTH PARCEL PLOT PLAN 1
1/32" = 1'-0"

NORTH

PARCEL A:
SOUTH
APN: 5414016002
ADDRESS: 1030 N BROADWAY, 1310 N BROADWAY, 1322 N BROADWAY, 1251 N SPRING ST, 1050 N BROADWAY, 1040 N BROADWAY

PARCEL JSY:
NORTH
APN: 5414016002
ADDRESS: NONE

PARCEL B:
NORTH
APN: 5414016002
ADDRESS: 1380 N BROADWAY

LEGAL DESCRIPTION:
REFERENCED FROM SURVEY
THE LAND REFERRED TO HEREIN IS SITUATED IN THE STATE OF CALIFORNIA, COUNTY OF LOS ANGELES, DESCRIBED AS FOLLOWS:

PARCEL A:
BEING PARCEL 2 OF REVISED CERTIFICATE OF COMPLIANCE FOR LOT LINE ADJUSTMENT, RECORDED JANUARY 20, 2000 AS INSTRUMENT NO. 00-0081163, OFFICIAL RECORDS, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

THAT PORTION OF THAT CERTAIN PARCEL OF LAND IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, DESCRIBED AS PARCEL 3 IN THE CORPORATION GRANT DEED OF UNION PACIFIC RAILROAD COMPANY, RECORDED MAY 24, 1999 AS DOCUMENT 99-0932192, OF OFFICIAL RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, BEING A PORTION OF LOT "A" OF THE FREIGHT DEPOT TRACT, IN SAID CITY, COUNTY AND STATE, AS PER MAP RECORDED IN BOOK 72, PAGES 75 AND 76 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER, DESCRIBED AS FOLLOWS:

COMMENCING AT THE INTERSECTION OF THE CENTERLINES OF LLEWELLYN STREET AND NORTH SPRING STREET, AS SAID CENTERLINES ARE SHOWN ON THE MAP OF THE TRACT NO. 19617, RECORDED IN BOOK 558, PAGES 45 AND 46 OF MAPS, IN THE OFFICE OF SAID COUNTY RECORDER, THENCE ALONG THE CENTERLINE OF SAID NORTH SPRING STREET, SOUTH 50° 47' 43" WEST 486.76 FEET, THENCE NORTH 15° 30' 02" EAST 61.30 FEET TO THE SOUTHEASTERLY BOUNDARY OF SAID LOT "A", THENCE ALONG SAID SOUTHEASTERLY BOUNDARY AND THE SOUTHERLY BOUNDARY OF SAID LOT "A" THE FOLLOWING TWO (2) COURSES 1) SOUTH 47° 08' 30 WEST 85.60 FEET, 2) NORTH 67° 45' 38" WEST 28.50 FEET TO THE TRUE POINT OF BEGINNING, SAID TRUE POINT OF BEGINNING BEING THE SOUTHERLY TERMINUS OF THAT CERTAIN CURVE CONCAVE TO THE EAST AND HAVING A RADIUS OF 11489.50 FEET, IN THE WESTERLY BOUNDARY OF THAT CERTAIN PARCEL OF LAND DESCRIBED AS PARCEL PA-020-2, (PERMANENT AREA) IN THE EASEMENT AGREEMENT BETWEEN SOUTHERN PACIFIC TRANSPORTATION COMPANY AND LOS ANGELES METROPOLITAN TRANSPORTATION AUTHORITY, RECORDED ON JUNE 30, 1994, AS DOCUMENT NO. 94-1251701, OF OFFICIAL RECORDS, IN THE OFFICE OF SAID COUNTY RECORDER, A RADIAL LINE OF SAID CURVE THROUGH SAID POINT BEARS NORTH 74° 05' 31" WEST, THENCE ALONG THE WESTERLY BOUNDARY OF SAID CERTAIN PARCEL OF LAND AS FOLLOWS:

NORTHERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 1° 25' 33" AN ARC DISTANCE OF 285.91; THENCE, TANGENT TO SAID CURVE, NORTH 17° 20' 02" EAST 263.30, THENCE NORTH 19° 19' 46" EAST 105.16 FEET, THENCE NORTH 21° 49' 15" EAST 41.07 FEET TO A TANGENT CURVE CONCAVE TO THE SOUTHEAST AND HAVING A RADIUS OF 1689.50 FEET, THENCE NORTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 8° 20' 30" AN ARC DISTANCE OF 245.97 FEET, THENCE NORTH 59° 50' 15" WEST 25.66 FEET TO A CURVE CONCAVE TO THE SOUTHEAST AND HAVING A RADIUS OF 1612.00 FEET, THENCE NORTHEASTERLY ALONG SAID LAST MENTIONED CURVE THROUGH A CENTRAL ANGLE OF 9° 54' 51" AN ARC DISTANCE OF 278.94 FEET, THENCE NORTH 41° 38', 43" EAST 98.83 FEET, THENCE NORTH 44° 53' 20" EAST 120.39 FEET, THENCE NORTH 49° 11' 41" EAST 145.37 FEET TO A STRAIGHT LINE, DRAWN AT RIGHT ANGLES TO AND EXTENDING SOUTHEASTERLY FROM A POINT IN THAT CERTAIN COURSE DESCRIBED AS HAVING A BEARING AND LENGTH OF, ON A DIFFERENT BASIS OF BEARINGS, SOUTH 50° 44' 30" WEST 1484.12 FEET IN THE SOUTHEASTERLY LINE OF THAT CERTAIN LOT AND PARCEL OF LAND DESCRIBED IN THAT INDENTURE BETWEEN THE SOUTHERN PACIFIC RAILROAD COMPANY AND SOUTHERN PACIFIC COMPANY, ITS LESSEE AND THE CITY OF LOS ANGELES RECORDED ON AUGUST 19, 1910, IN BOOK 4225, PAGE 278 OF DEEDS IN THE OFFICE OF SAID COUNTY RECORDER, SAID LAST MENTIONED POINT BEING DISTANT SOUTH 50° 38' 32" WEST, MEASURED ALONG SAID CERTAIN COURSE, 1243.56 FEET FROM ITS NORTHEASTERLY TERMINUS, THENCE, LEAVING SAID WESTERLY BOUNDARY, NORTH 39° 21' 28" WEST ALONG SAID STRAIGHT LINE, 21.51 FEET TO SAID CERTAIN COURSE, THENCE SOUTH 50° 38' 32" WEST, ALONG SAID CERTAIN COURSE, 241.63 FEET TO ITS SOUTHWESTERLY TERMINUS IN THE NORTHWESTERLY BOUNDARY OF SAID LOT "A", TENCE ALONG THE BOUNDARY F SAID LOT "A" AS FOLLOWS:

SOUTH 45° 58' 22" WEST 670.39 FEET, SOUTH 58° 36' 38" EAST 91.00 FEET, SOUTH 34° 29' 22" WEST 85.00 FEET, SOUTH 16° 26' 22" WEST 125.00 FEET, SOUTH 31° 04' 56" WEST 83.05 FEET, SOUTH 14° 56' 51" WEST 60.00 FEET, SOUTH 29° 53' 22" WEST 66.00 FEET, SOUTH 61° 20' 53" EAST 0.90, SOUTH 39° 53' 22" WEST 40.60 FEET, SOUTH 61° 20' 53" EAST 7.20 FEET, SOUTH 22° 53' 22" WEST 59.99 FEET, SOUTH 28° 39' 52" WEST 200.62 FEET AND SOUTH 67° 45' 38" EAST 233.02 FEET TO THE TRUE POINT OF BEGINNING.

TOGETHER WITH THAT PORTION OF SAID LOT "A", IN SAID CITY, COUNTY AND STATE, INCLUDED WITHIN THE BOUNDARIES OF SAID CERTAIN LOT AND PARCEL OF LAND AS DESCRIBED IN SAID CERTAIN INDENTURE. EXCEPTING THEREFROM THAT PORTION THEREOF LYING NORTHEASTERLY OF THE NORTHWESTERLY PROLONGATION OF SAID STRAIGHT LINE.

PARCEL B:
BEING PARCEL 3 OF REVISED CERTIFICATE OF COMPLIANCE FOR LOT-LINE ADJUSTMENT, RECORDED JANUARY 20, 2000, AS INSTRUMENT NO.00-0081163, OFFICIAL RECORDS, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

THOSE PORTIONS OF THOSE CERTAIN PARCELS OF LAND IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, DESCRIBED AS PARCEL 2, PARCEL 3 AND PARCEL 4 IN THE CORPORATION GRANT DEED OF UNION PACIFIC RAILROAD COMPANY RECORDED MAY 24, 1999 AS DOCUMENT NO. 99-0932195, OF OFFICIAL RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, BEING THAT PORTION OF CITY LANDS, IN SAID CITY, COUNTY AND STATE, AS SHOWN ON MAP RECORDED IN BOOK 2, PAGES 504 AND 505 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, AS DESCRIBED IN THE FINAL ORDER OF CONDEMNATION, ENTERED IN THE LOS ANGELES COUNTY SUPERIOR COURT CASE NO. 68,092, A CERTIFIED COPY OF WHICH WAS RECORDED ON NOVEMBER 22, 1910, AS INSTRUMENT NO. 208, IN BOOK 4388, PAGE 48 OF DEEDS, IN THE OFFICE OF SAID COUNTY RECORDER, INCLUDED WITHIN THE ORDINANCE NO. 30,445 (NEW SERIES), ON FILE IN THE CITY CLERK'S OFFICE OF SAID CITY, TOGETHER WITH THAT PORTION OF "LOT A" OF THE FREIGHT DEPOT TRACT, IN SAID CITY COUNTY AND STATE AS PER MAP RECORDED IN BOOK 72, PAGES 75 AND 76 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF SAID COUNTY RECORDER AND THAT PORTION OF LOT 1 OF WILSON'S BUENA VISTA ST TRACT, IN SAID CITY, COUNTY, AND STATE, AS PER MAP RECORDED IN BOOK 60, PAGE 61 OF SAID MISCELLANEOUS RECORDS AND THAT PORTION OF LOT 8 OF THE JOSE SAVERIANO YBARRA TRACT, IN SAID CITY, COUNTY AND STATE, AS PER MAP RECORDED IN BOOK 17, PAGE 32 OF SAID MISCELLANEOUS RECORDS, DESCRIBED AS FOLLOWS:

COMMENCING AT THE INTERSECTION OF THE CENTERLINES OF LLEWELLYN STREET AND NORTH SPRING STREET, AS SAID CENTERLINES ARE SHOWN ON THE MAP OF TRACT NO. 19617, RECORDED IN BOOK 558, PAGES 45 AND 46 OF MAPS, IN THE OFFICE OF SAID COUNTY RECORDER, THENCE ALONG THE CENTERLINE OF SAID NORTH SPRING STREET, SOUTH 50° 47' 43" WEST 486.76 FEET, THENCE NORTH 15° 30' 02" EAST 61.30 FEET TO THE SOUTHEASTERLY BOUNDARY OF SAID LOT "A", THENCE ALONG SAID SOUTHEASTERLY BOUNDARY AND THE SOUTHERLY BOUNDARY OF SAID LOT "A" THE FOLLOWING TWO (2) COURSES 1) SOUTH 47° 08' 30" WEST 85.60 FEET, 2) NORTH 67° 45' 38" WEST 28.50 FEET TO THE SOUTHERLY TERMINUS OF THAT CERTAIN CURVE CONCAVE TO THE EAST AND HAVING A RADIUS OF 11489.50 FEET, IN THE WESTERLY BOUNDARY OF THAT CERTAIN PARCEL OF LAND DESCRIBED AS PARCEL PA-020-2, (PERMANENT AREA) IN THE EASEMENT AGREEMENT BETWEEN SOUTHERN PACIFIC TRANSPORTATION COMPANY AND LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY, RECORDED ON JUNE 30, 1994 AS DOCUMENT NO 94-1251701, OF OFFICIAL RECORDS, IN THE OFFICE OF SAID COUNTY RECORDER, A RADIAL LINE OF SAID CURVE THROUGH SAID POINT BEARS NORTH 74° 05' 31" WEST, THENCE ALONG THE WESTERLY BOUNDARY OF SAID CERTAIN PARCEL OF LAND AS FOLLOWS:

NORTHERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 1° 25' 33" AN ARC DISTANCE OF 285.91, THENCE, TANGENT TO SAID CURVE, NORTH 17° 20' 02" EAST 263.30 THENCE NORTH 19° 19' 46" EAST 105.16 FEET, THENCE NORTH 23° 49' 15" EAST 41.07 FEET TO A TANGENT CURVE CONCAVE TO THE SOUTHEAST AND HAVING A RADIUS OF 1689.50 FEET, THENCE NORTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 8° 20' 30" AN ARC DISTANCE OF 245.97 FEET, THENCE NORTH 59° 50' 15" WEST 25.66 FEET TO A CURVE CONCAVE TO THE SOUTHEAST AND HAVING A RADIUS OF 1612.00 FEET, THENCE NORTHEASTERLY ALONG SAID LAS MENTIONED CURVE THROUGH A CENTRAL ANGLE OF 9° 54' 51" AN ARC DISTANCE OF 278.94 FEET, THENCE NORTH 41° 38' 43" EAST 98.83 FEET, THENCE NORTH 44° 53' 20" EAST 120.39 FEET, THENCE NORTH 49° 11' 41" EAST 145.37 FEET TO THE TRUE POINT OF BEGINNING, SAID TRUE POINT OF BEGINNING BEING IN A STRAIGHT LINE, DRAWN AT RIGHT ANGLES TO AND EXTENDING SOUTHEASTERLY FROM A POINT IN THAT CERTAIN COURSE DESCRIBED AS HAVING A BEARING AND LENGTH OF, ON A DIFFERENT BASIS OF BEARINGS, SOUTH 50° 44' 30" WEST 1484.12 FEET IN THE SOUTHEASTERLY LINE OF THAT CERTAIN LOT AND PARCEL OF LAND DESCRIBED IN THAT CERTAIN INDENTURE BETWEEN THE SOUTHERN PACIFIC RAILROAD COMPANY AND SOUTHER PACIFIC COMPANY, ITS LESSEE AND THE CITY OF LOS ANGELES, RECORDED ON AUGUST 19, 1910, IN BOOK 4225, PAGE 278 OF DEEDS, IN THE OFFICE OF SAID COUNTY RECORDER, SAID LAST MENTIONED POINT BEING DISTANT SOUTH 50° 28' 32" WEST, MEASURED ALONG SAID CERTAIN COURSE, 1243.56 FEET FROM ITS NORTHEASTERLY TERMINUS, THENCE NORTH 53° 57' 13" EAST 351.63 FEET, THENCE NORTH 52° 33' 01" EAST 433.62 FEET TO A POINT ON A TANGENT CURVE CONCAVE TO THE SOUTHEAST AND HAVING A RADIUS OF 405.00 FEET, THENCE NORTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 12° 48' 19" AN ARC DISTANCE OF 90.51 FEET, THENCE NORTH 65° 21' 20" EAST 771.76 FEET, THENCE NORTH 24° 38' 40" WEST 16.00 FEET, THENCE NORTH 65° 21' 20" EAST 30.00 FEET, THENCE SOUTH 24° 38' 40" EAST 16.00 FEET, THENCE NORTH 65° 21' 20" EAST 271.50 FEET, THENCE NORTH 53° 58' 59" EAST 178.09 FEET TO THE SOUTHEASTERLY LINE OF SAID CERTAIN LOT AND PARCEL OF LAND DESCRIBED IN SAID CERTAIN INDENTURE, THENCE ALONG SAID LAST MENTIONED SOUTHEASTERLY LINE AS FOLLOWS:

NORTH 14° 31' 53" WEST 8.00 FEET, THENCE SOUTH 75° 28' 07" WEST 659.53 FEET, THENCE SOUTH 75° 50' 12" WEST 53.80 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE TO THE SOUTHEAST AND HAVING A RADIUS OF 475.00 FEET, THENCE SOUTHWESTERLY ALONG SAID CURBE, THROUGH A CENTRAL ANGLE OF 25° 11' 40", AN ARC DISTANCE OF 208.87 FEET, THENCE SOUTH 50° 38' 32" WEST, TANGENT TO SAID CURVE, 1243.56 FEET TO SAID STRAIGHT LINE, THENCE, ALONG SAID STRAIGHT LINE, SOUTH 39° 21' 28" EAST 21.51 FEET TO THE TRUE POINT OF BEGINNING.

TOGETHER WITH THOSE PORTIONS OF SAID LOT "A" AND SAID LOT 8, IN SAID CITY, COUNTY AND STATE, INCLUDED WITHIN THE BOUNDARIES, OF SAID LOT AND PARCEL OF LAND AS DESCRIBED IN SAID CERTAIN INDENTURE.

EXCEPTING THEREFROM THAT PORTION THEREOF LYING SOUTHWESTERLY OF THE NORTHWESTERLY PROLONGATION OF SAID STRAIGHT LINE.

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FAX: 323.785.1801
rios.com

PROJECT ID
18046

CONSULTANT

NOT FOR CONSTRUCTION

REVISIONS

ISSUES	
ENTITLEMENT	07/01/2024

PLOT PLAN - ENLARGED

SCALE: 1/32"=1'-0"
WHEN PRINTED ON 24"x36" SHEETS

DRAWING NO.
AS1.02

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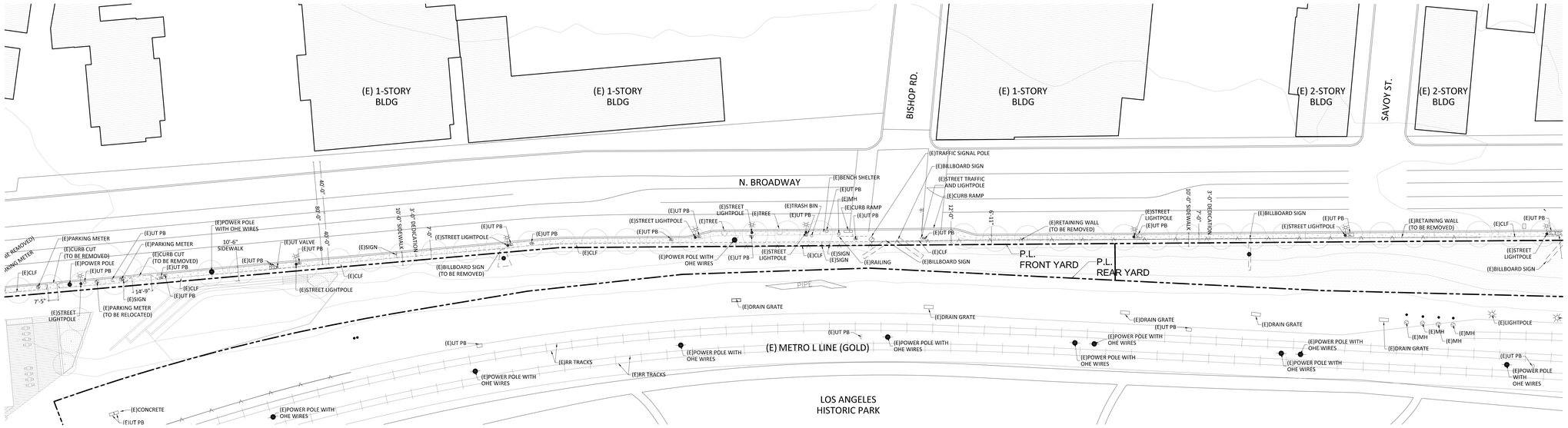

CENTRAL PARCEL PLOT PLAN 1
1/32" = 1'-0"

NORTH

RIOS

3101 W EXPOSITION PLACE
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FAX: 323.785.1801
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REVISIONS

ISSUED
ENTITLEMENT 07/01/2024

DRAWING TITLE
PLOT PLAN - ENLARGED

SCALE 1/32"=1'-0"
WHEN PRINTED ON 30"x42" SHEETS

DRAWING NO.
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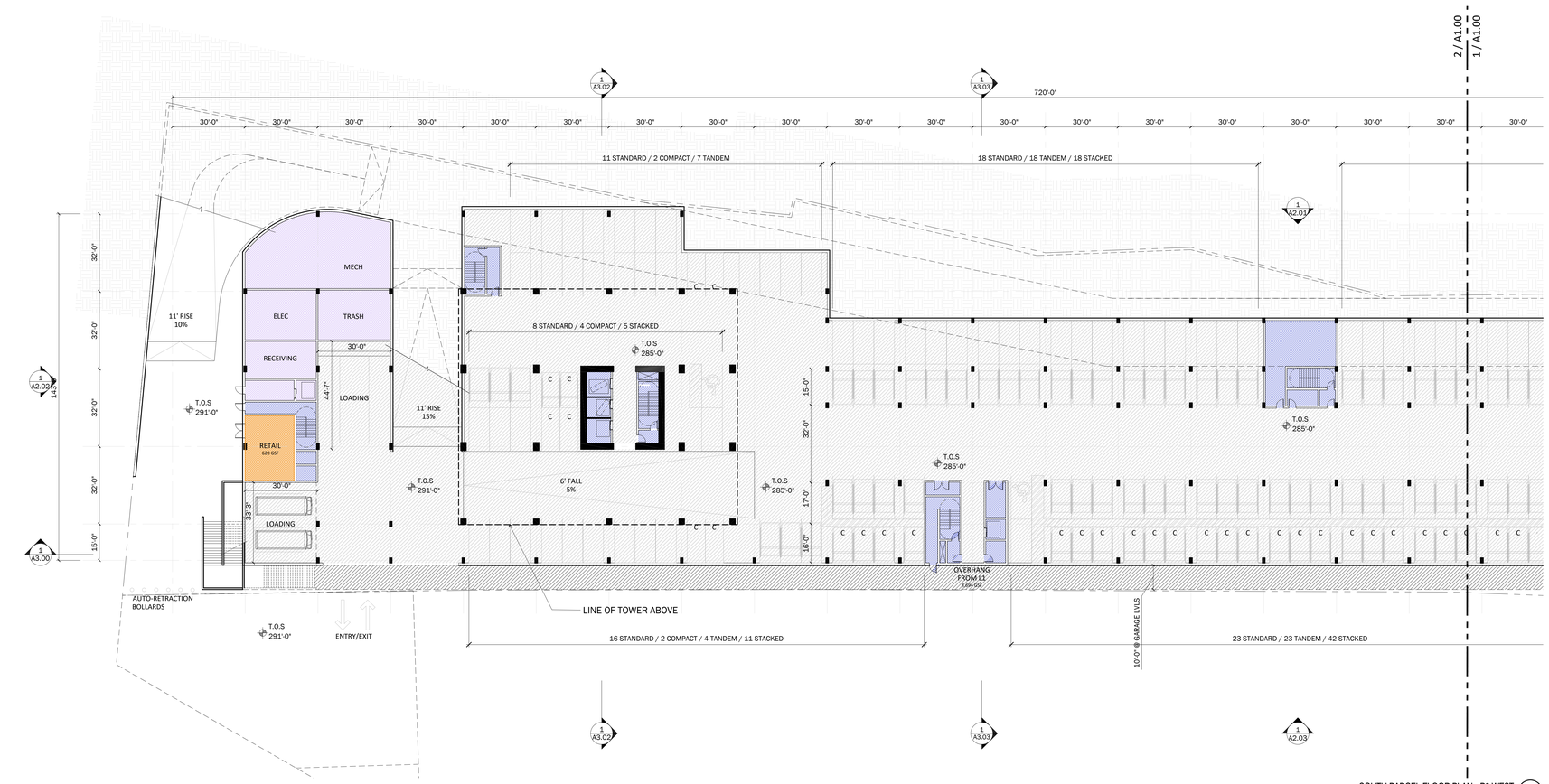
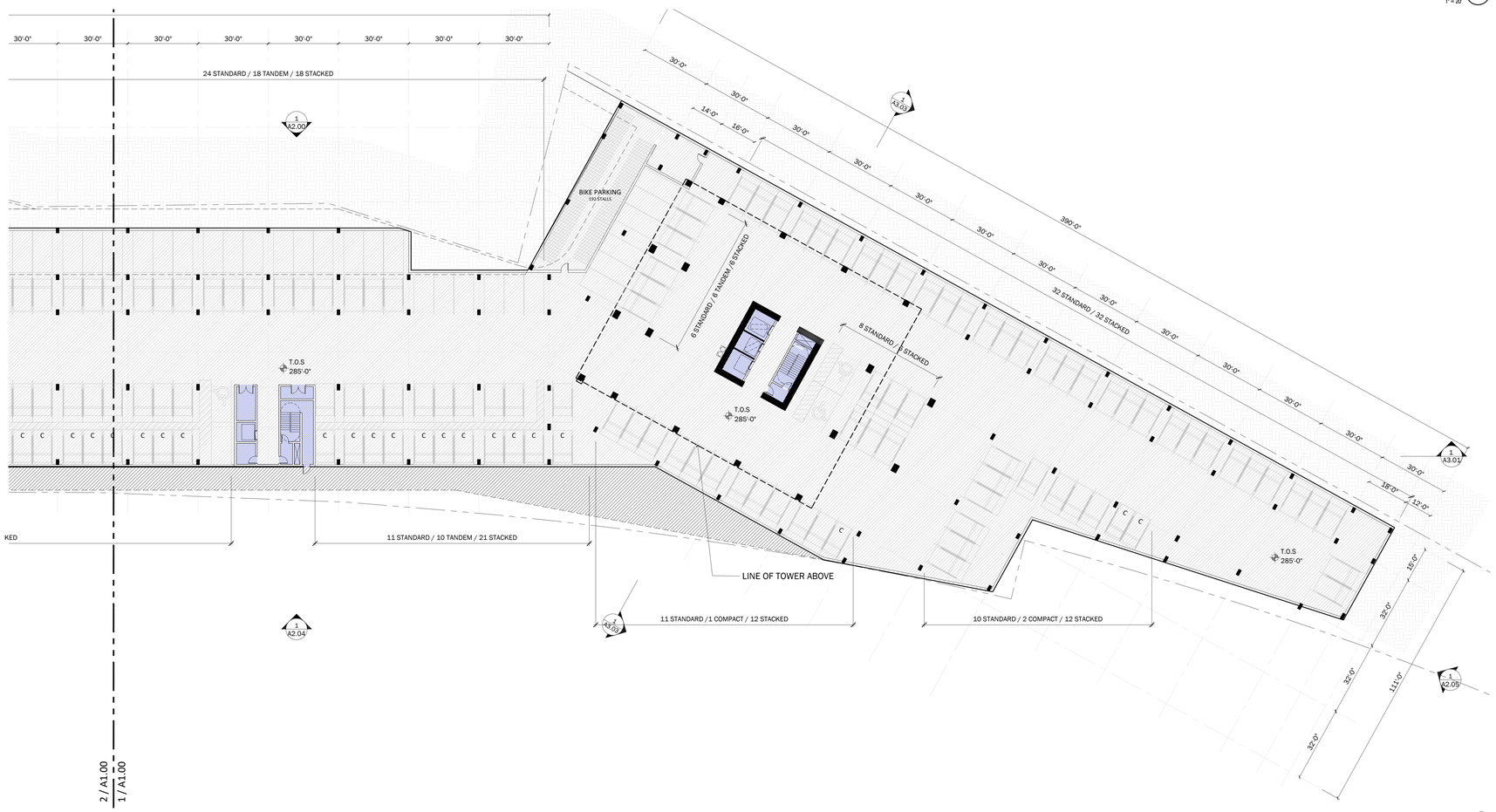


SOUTH PARCEL FLOOR PLAN - P3 WEST (2)
1" = 20'

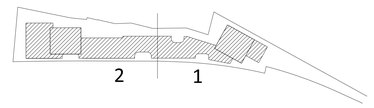


SOUTH PARCEL FLOOR PLAN - P3 EAST (1)
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG
- STUDIO
- LIVE / WORK
- 1BR
- 2BR
- 3BR

PARKING SUMMARY

RESIDENTIAL PARKING - P3

STANDARD:	178 TOTAL (0 EVSE, 0 EVCS, 5 ADA, 0 ADA VAN)
COMPACT:	11 TOTAL
TANDEM:	86 TOTAL (36 COMPACT)
STACKED:	183 TOTAL (41 COMPACT)
BICYCLE - LONG TERM:	192

COMMERCIAL PARKING - P3

STANDARD:	0
COMPACT:	0
TANDEM:	0
STACKED:	0
BICYCLE - LONG TERM:	0

TOTAL PARKING - P3

STANDARD:	178 TOTAL (0 EVSE, 0 EVCS, 5 ADA, 0 ADA VAN)
COMPACT:	11 TOTAL
TANDEM:	86 TOTAL (36 COMPACT)
STACKED:	183 TOTAL (41 COMPACT)
BICYCLE - LONG TERM:	192

NOTES

NORTH

RIOS
3101 W EXPOSITION PLACE
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PROJECT ID: 18046

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ISSUED: ENTITLEMENT 07/01/2024

DRAWING TITLE: PLAN - P3 SOUTH PARCEL

SCALE: 1" = 20' (WHEN PRINTED ON 24"x36" SHEET)

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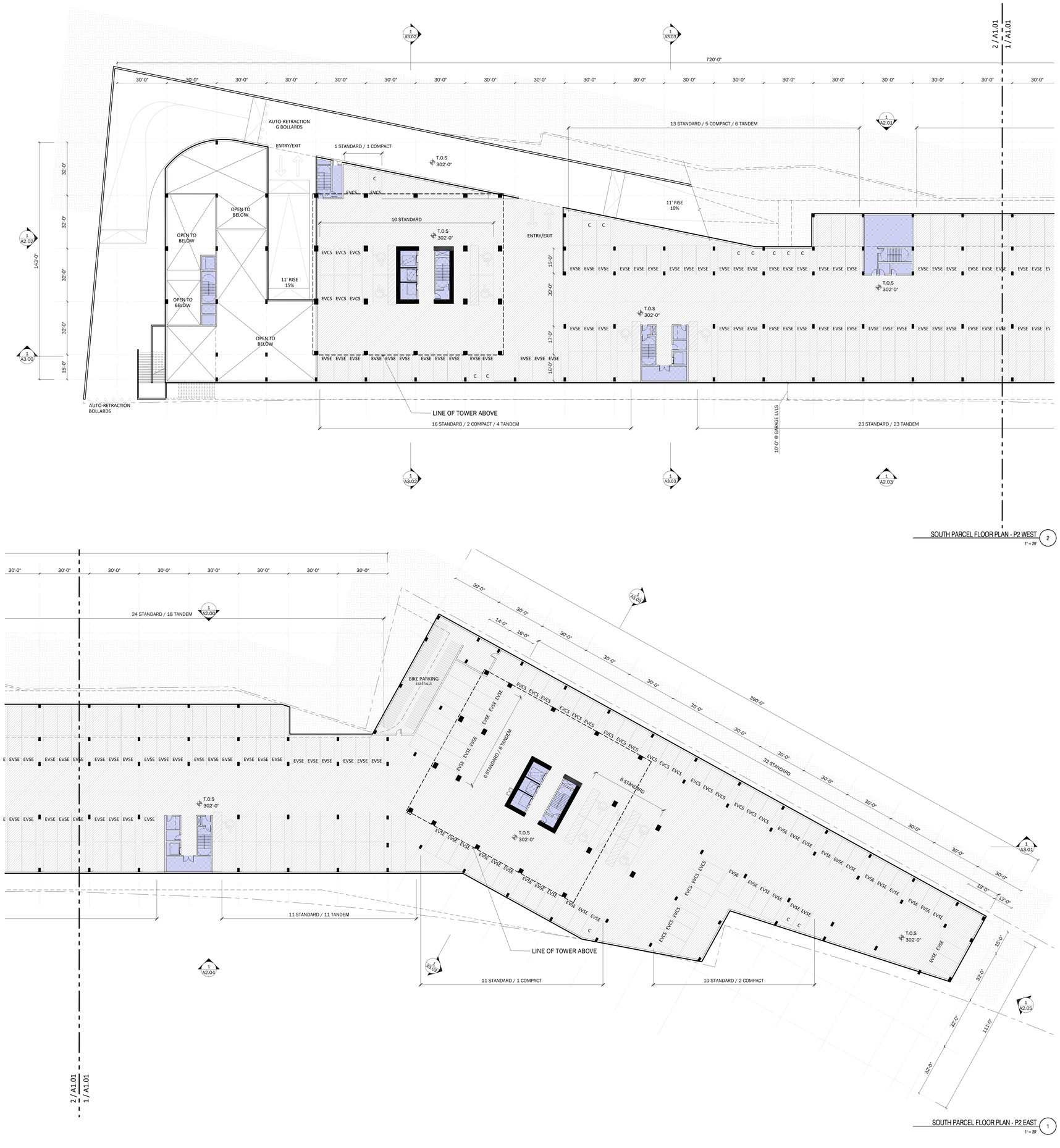


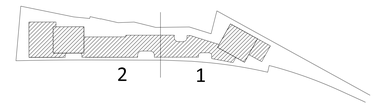
SOUTH PARCEL FLOOR PLAN - P2 WEST 2
1" = 20'

SOUTH PARCEL FLOOR PLAN - P2 EAST 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG
- STUDIO
- LIVE / WORK
- 1BR
- 2BR
- 3BR

PARKING SUMMARY

RESIDENTIAL PARKING - P2

STANDARD:	163 TOTAL (109 EVSE, 31 EVCS, 13 ADA, 0 ADA VAN)
COMPACT:	11 TOTAL (10 EVSE, 1 EVCS)
TANDEM:	68 TOTAL (2 COMPACT)
STACKED:	0
BICYCLE - LONG TERM:	192

COMMERCIAL PARKING - P2

STANDARD:	0
COMPACT:	0
TANDEM:	0
STACKED:	0
BICYCLE - LONG TERM:	0

TOTAL PARKING - P2

STANDARD:	163 TOTAL (109 EVSE, 31 EVCS, 13 ADA, 0 ADA VAN)
COMPACT:	11 TOTAL (10 EVSE, 1 EVCS)
TANDEM:	68 TOTAL (2 COMPACT)
STACKED:	0
BICYCLE - LONG TERM:	192

NOTES

NORTH

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REVISIONS

ISSUED ENTITLEMENT 07/01/2024

DRAWING TITLE
PLAN - P2
SOUTH PARCEL

SCALE 1" = 20' UNLESS PRINTED ON 24"x36" SHEET

DRAWING NO. A1.01

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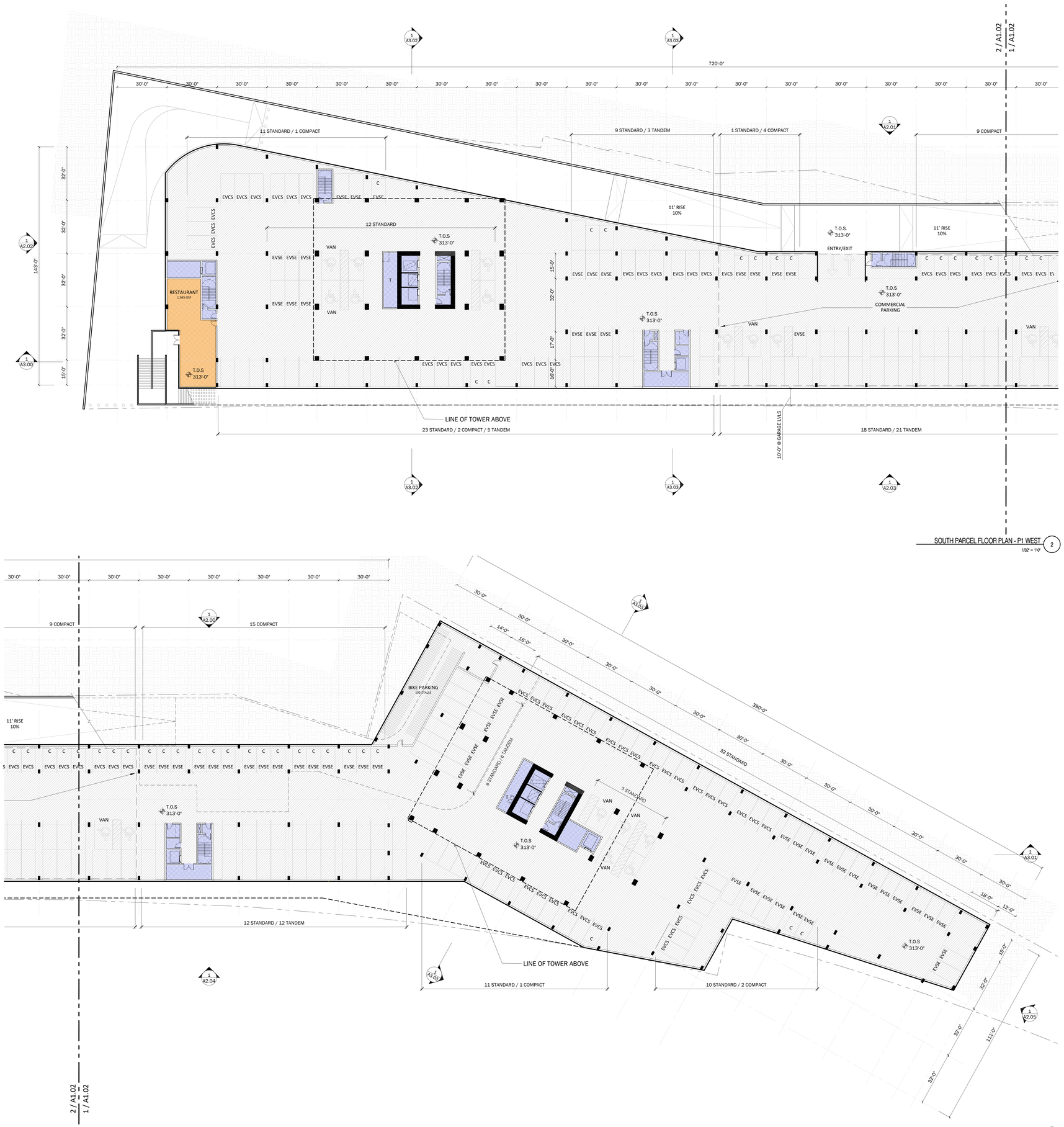


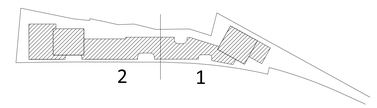
KEYPLAN: SITE

1" = 500'



KEYPLAN: SOUTH PARCEL

1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG
- STUDIO
- LIVE / WORK
- 1BR
- 2BR
- 3BR

PARKING SUMMARY

RESIDENTIAL PARKING - P1

STANDARD:	131 TOTAL (38 EVSE, 53 EVCS, 6 ADA, 5 ADA VAN)
COMPACT:	21 TOTAL (18 EVSE, 3 EVCS)
TANDEM:	26 TOTAL (2 COMPACT)
STACKED:	0
BICYCLE - LONG TERM:	179

COMMERCIAL PARKING - P1

STANDARD:	19 TOTAL (1 EVSE, 1 EVCS, 3 ADA, 2 ADA VAN)
COMPACT:	13 TOTAL (4 EVSE, 9 EVCS)
TANDEM:	21 TOTAL (0 COMPACT)
STACKED:	0
BICYCLE - LONG TERM:	13

TOTAL PARKING - P1

STANDARD:	150 TOTAL (39 EVSE, 54 EVCS, 9 ADA, 7 ADA VAN)
COMPACT:	34 TOTAL (22 EVSE, 12 EVCS)
TANDEM:	47 TOTAL (2 COMPACT)
STACKED:	0
BICYCLE - LONG TERM:	192

NOTES

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PROJECT ID: 18046

CONSULTANT

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REVISIONS

ISSUED: ENTITLEMENT 07/01/2024

DRAWING TITLE: PLAN - P1 SOUTH PARCEL

SCALE: 1" = 20' UNLESS PRINTED ON 24"x36" SHEET

DRAWING NO.: A1.02

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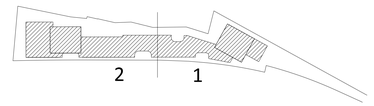
KEYPLAN: SITE

1" = 500'



KEYPLAN: SOUTH PARCEL

1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG
- STUDIO x 2
- LIVE / WORK x 2
- 1BR x 8
- 2BR x 15
- 3BR x 2

NOTES

NORTH

RIOS

3101 W EXPOSITION PLACE
LOS ANGELES, CA 90018
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FAX: 323.785.1801
rios.com

PROJECT ID: 18046

CONSULTANT

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ISSUED		
	ENTITLEMENT	07/01/2024

REVISIONS

DRAWING TITLE: PLAN - L1 SOUTH PARCEL

SCALE: 1" = 20'

DRAWING NO.: A1.03

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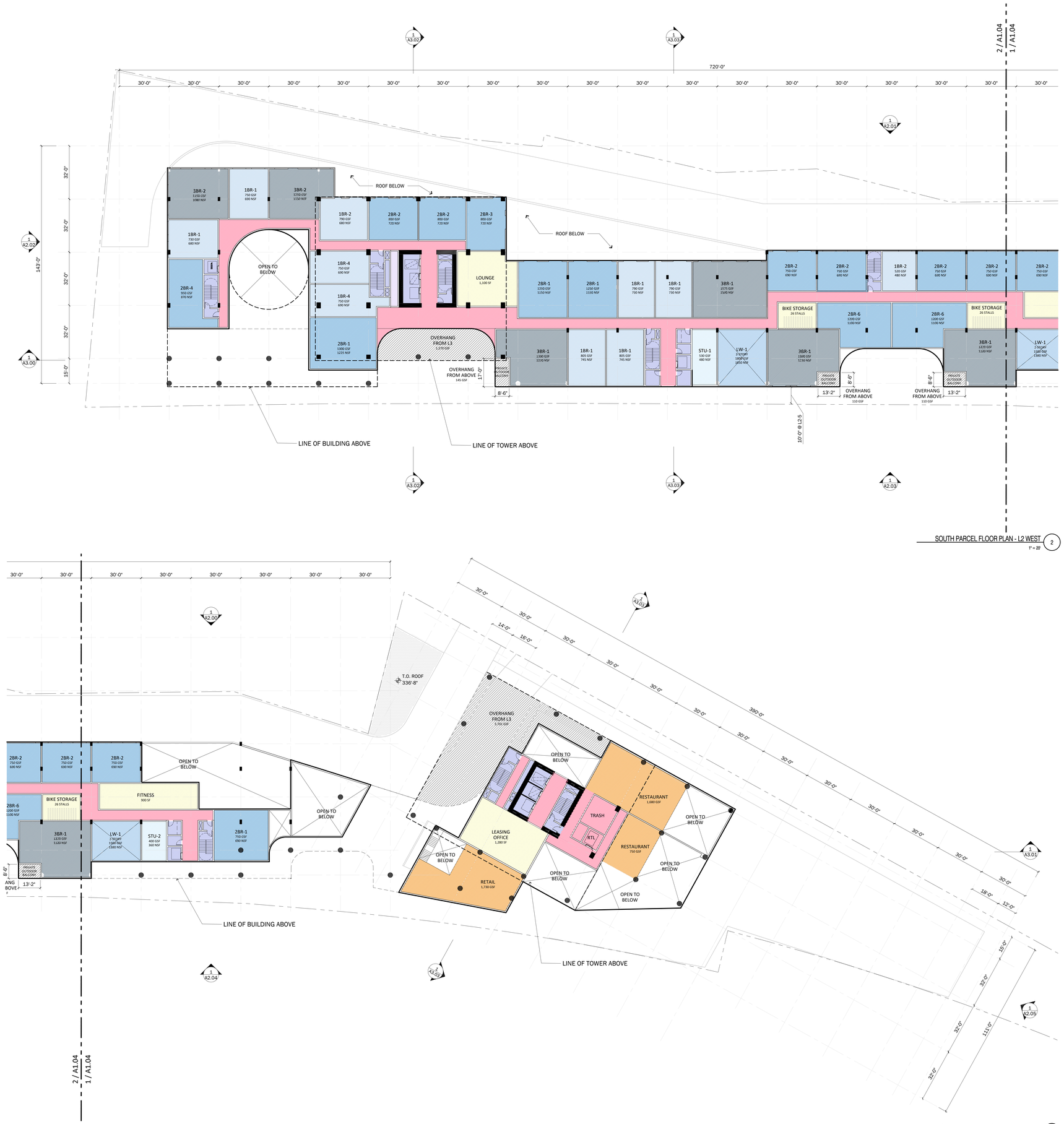


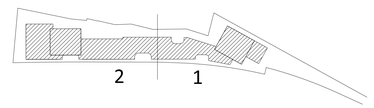
KEYPLAN: SITE

1" = 500'



KEYPLAN: SOUTH PARCEL

1" = 200'



LEGEND

RETAIL		STUDIO	x 2
AMENITY / LOBBY		LIVE / WORK	x 0
PARKING		1BR	x 10
SERVICE / MECH RM		2BR	x 15
CORES		3BR	x 6
CIRCULATION			
EARTH			
OVERHANG			

NOTES

NORTH

RIOS

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PROJECT ID: 18046

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REVISIONS

ISSUED: ENTITLEMENT 07/01/2024

DRAWING TITLE: PLAN - L2 SOUTH PARCEL

SCALE: 1" = 20' (UNLESS INDICATED ON DETAIL SHEET)

DRAWING NO.: A1.04

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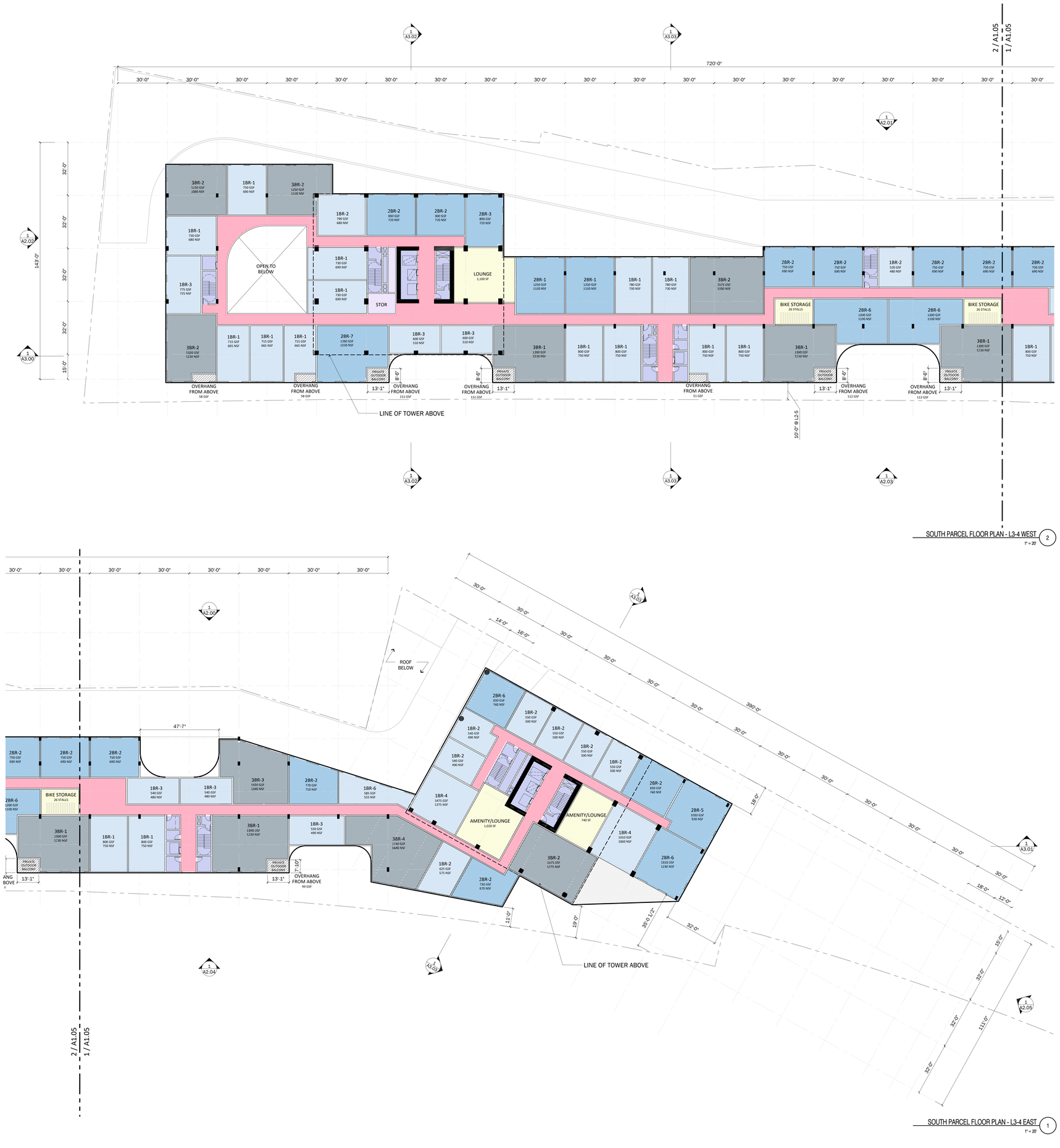


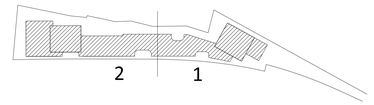
KEYPLAN: SITE

1" = 500'



KEYPLAN: SOUTH PARCEL

1" = 200'



LEGEND

RETAIL		STUDIO	x 0
AMENITY / LOBBY		LIVE / WORK	x 0
PARKING		1BR	x 33
SERVICE / MECH RM		2BR	x 19
CORES		3BR	x 11
CIRCULATION			
EARTH			
OVERHANG			

NOTES

NORTH

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ISSUED: ENTITLEMENT 07/01/2024

DRAWING TITLE: PLAN - L3-4 SOUTH PARCEL

SCALE: 1" = 20'
WHEN PRINTED ON 30"x42" SHEET

DRAWING NO.: A1.05

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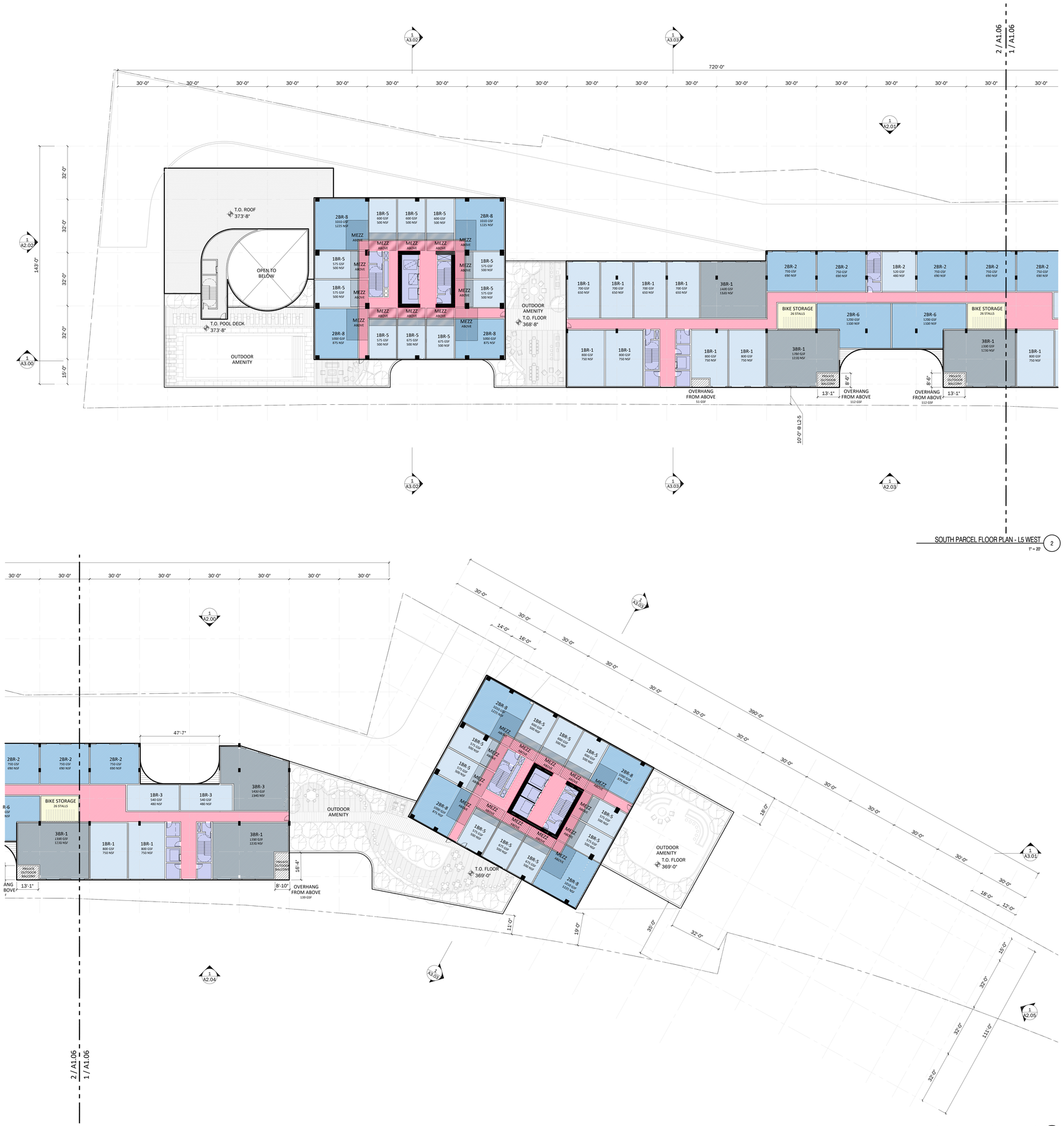


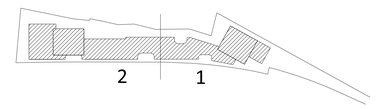
KEYPLAN: SITE

1" = 500'



KEYPLAN: SOUTH PARCEL

1" = 200'



LEGEND

RETAIL		STUDIO	x 0
AMENITY / LOBBY		LIVE / WORK	x 0
PARKING		1BR	x 33
SERVICE / MECH RM		2BR	x 15
CORES		3BR	x 5
CIRCULATION			
EARTH			
OVERHANG			

NOTES

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ISSUED: ENTITLEMENT 07/01/2024

DRAWING TITLE: PLAN - L5 SOUTH PARCEL

SCALE: 1" = 20" (WHEN PRINTED ON 24"x36" SHEET)

DRAWING NO.: A1.06

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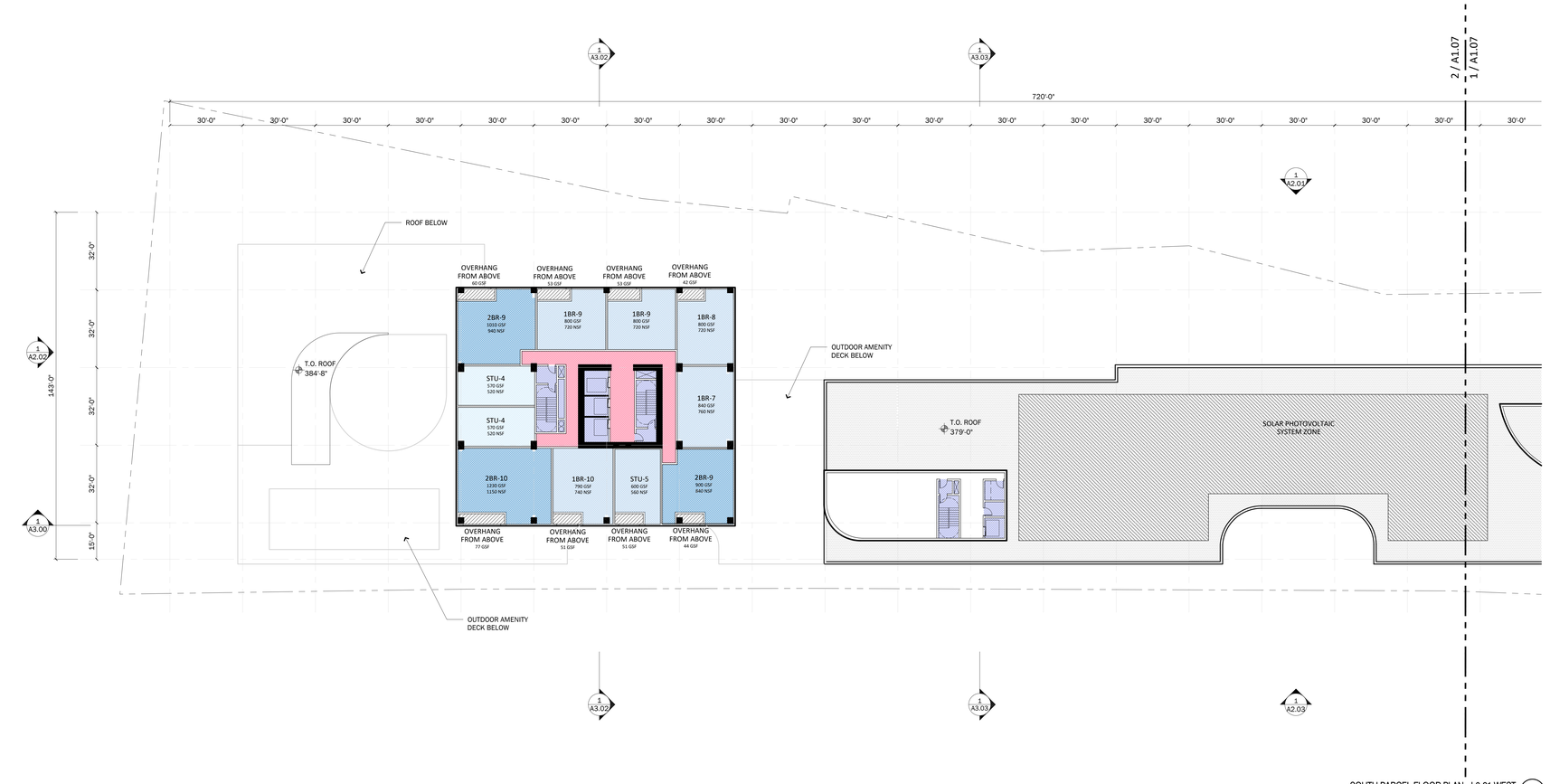
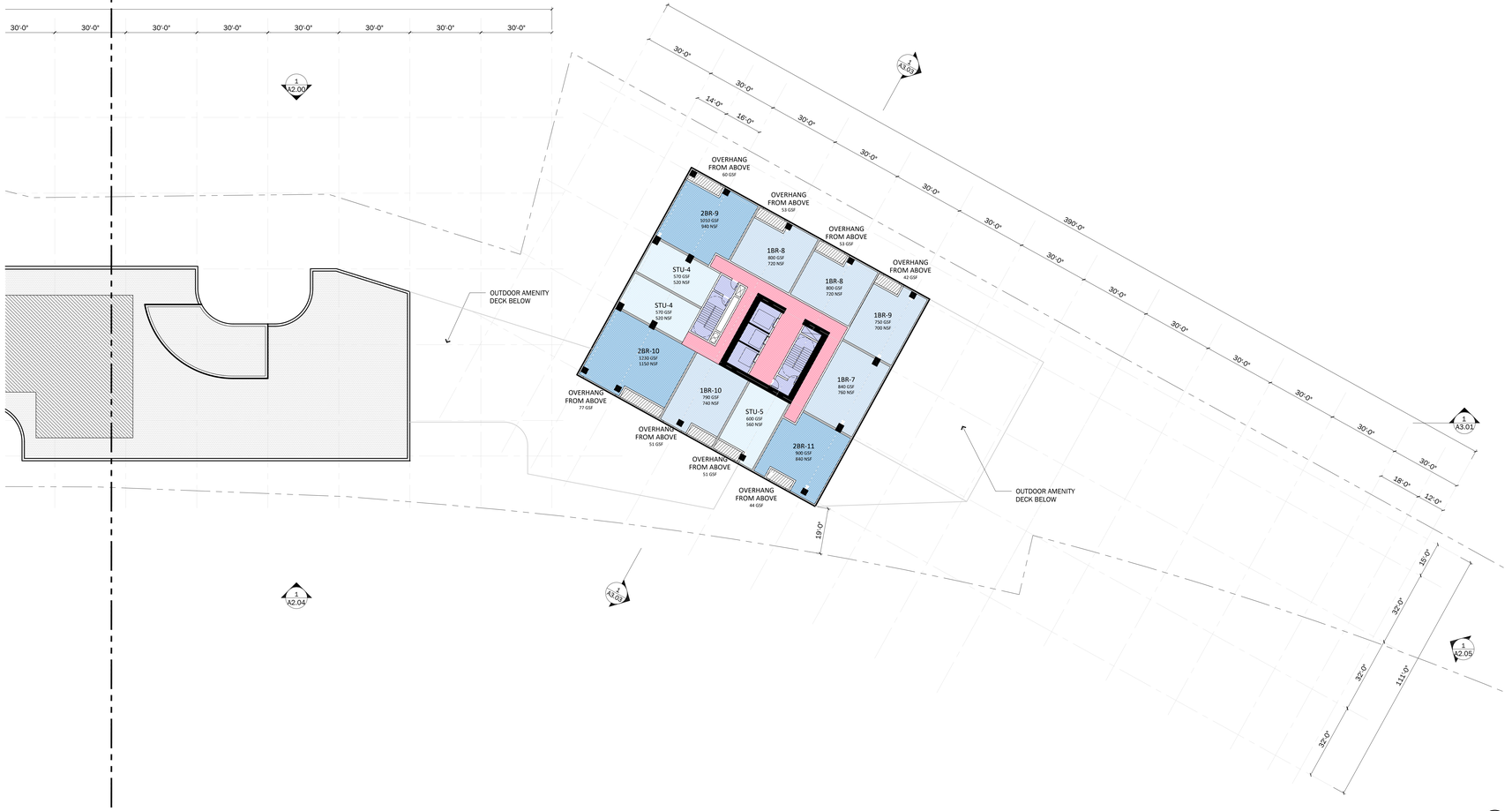


SOUTH PARCEL FLOOR PLAN - L6-21 WEST 2
1" = 20'

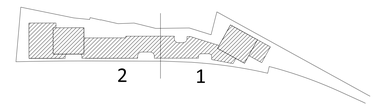


SOUTH PARCEL FLOOR PLAN - L6-21 EAST 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



LEGEND

RETAIL		STUDIO	x 6
AMENITY / LOBBY		LIVE / WORK	x 0
PARKING		1BR	x 10
SERVICE / MECH RM		2BR	x 6
CORES		3BR	x 0
CIRCULATION			
EARTH			
OVERHANG			

NOTES

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DRAWING TITLE: PLAN - L6-21 SOUTH PARCEL

SCALE: 1" = 20" WHEN PRINTED ON 30"x42" SHEET

DRAWING NO.: A1.07

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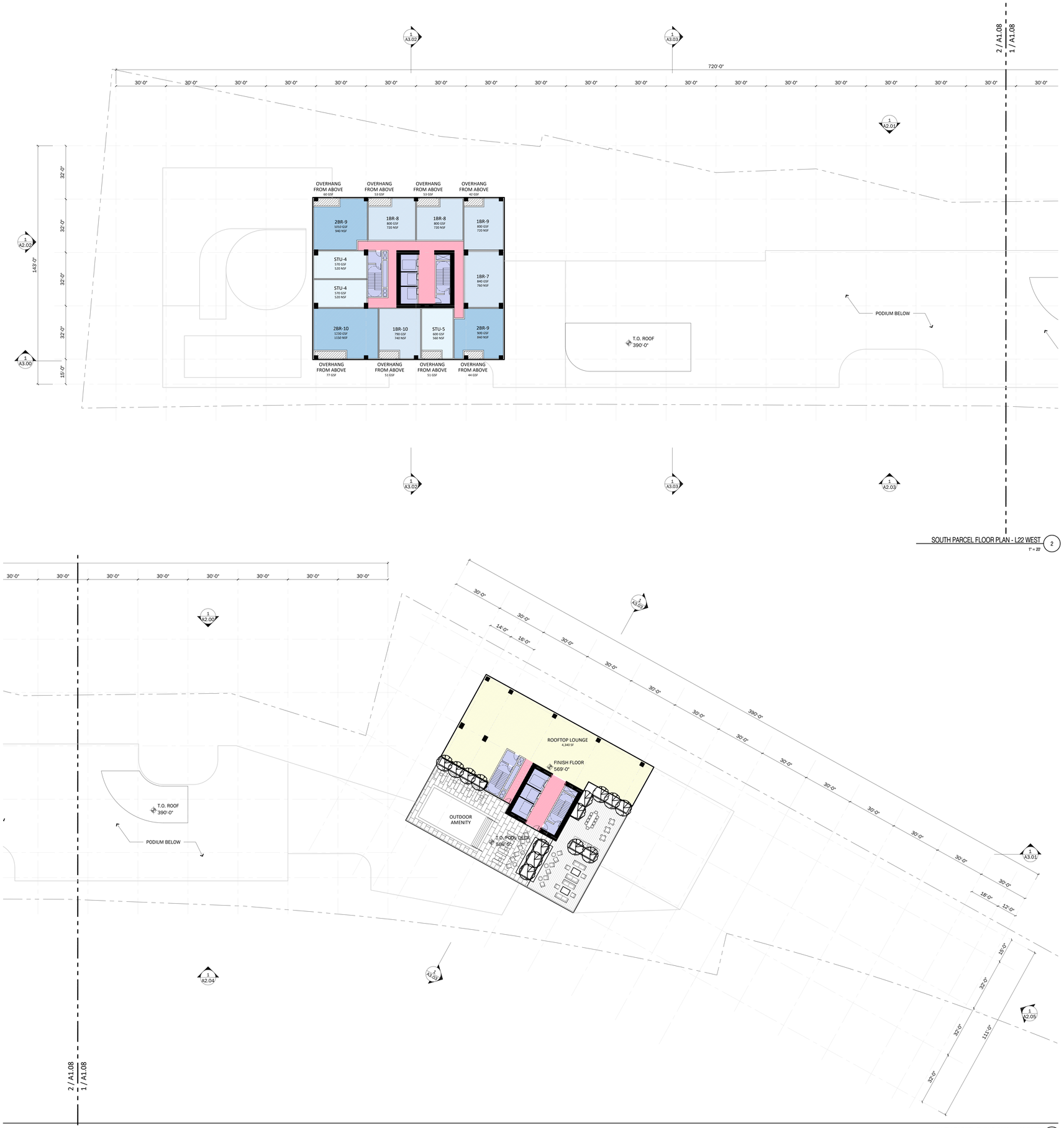


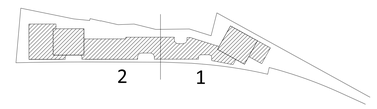
SOUTH PARCEL FLOOR PLAN - L22 WEST
1" = 20'

SOUTH PARCEL FLOOR PLAN - L22 EAST
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



LEGEND

RETAIL		STUDIO	x 3
AMENITY / LOBBY		LIVE / WORK	x 0
PARKING		1BR	x 5
SERVICE / MECH RM		2BR	x 3
CORES		3BR	x 0
CIRCULATION			
EARTH			
OVERHANG			

NOTES

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DRAWING TITLE
PLAN - L22
SOUTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 24"x36" SHEET

DRAWING NO.
A1.08

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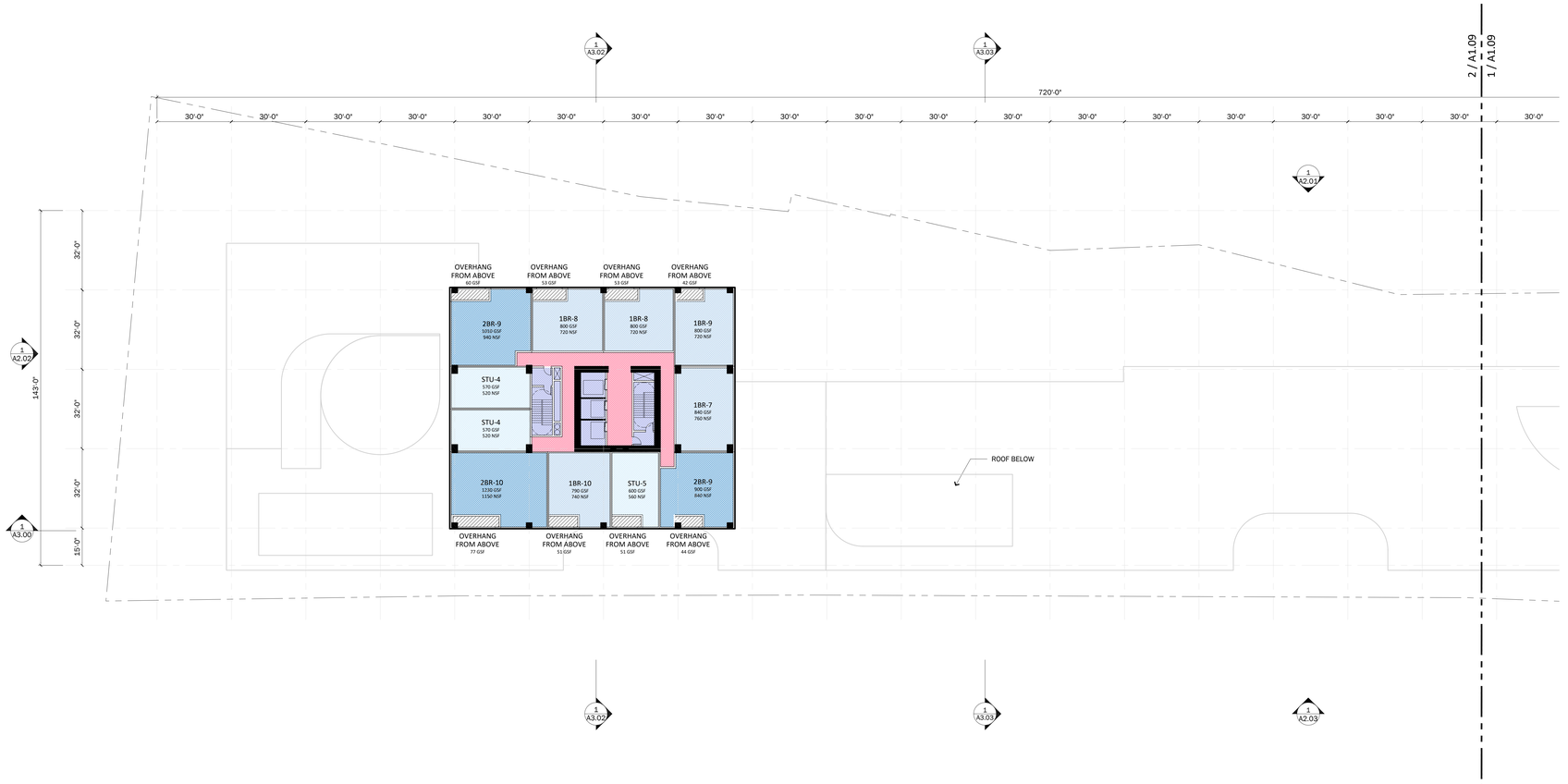


SOUTH PARCEL FLOOR PLAN - L23 WEST (2) 1" = 20'



SOUTH PARCEL FLOOR PLAN - L23 EAST (1) 1" = 20'

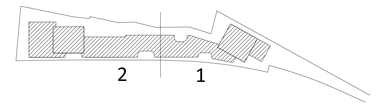
KEYPLAN: SITE

1" = 500'



KEYPLAN: SOUTH PARCEL

1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG
- STUDIO x 3
- LIVE / WORK x 0
- 1BR x 5
- 2BR x 3
- 3BR x 0

NOTES

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DRAWING TITLE: PLAN - L23 SOUTH PARCEL

SCALE: 1" = 20' (WHEN PRINTED ON 30"x42" SHEET)

DRAWING NO.: A1.09

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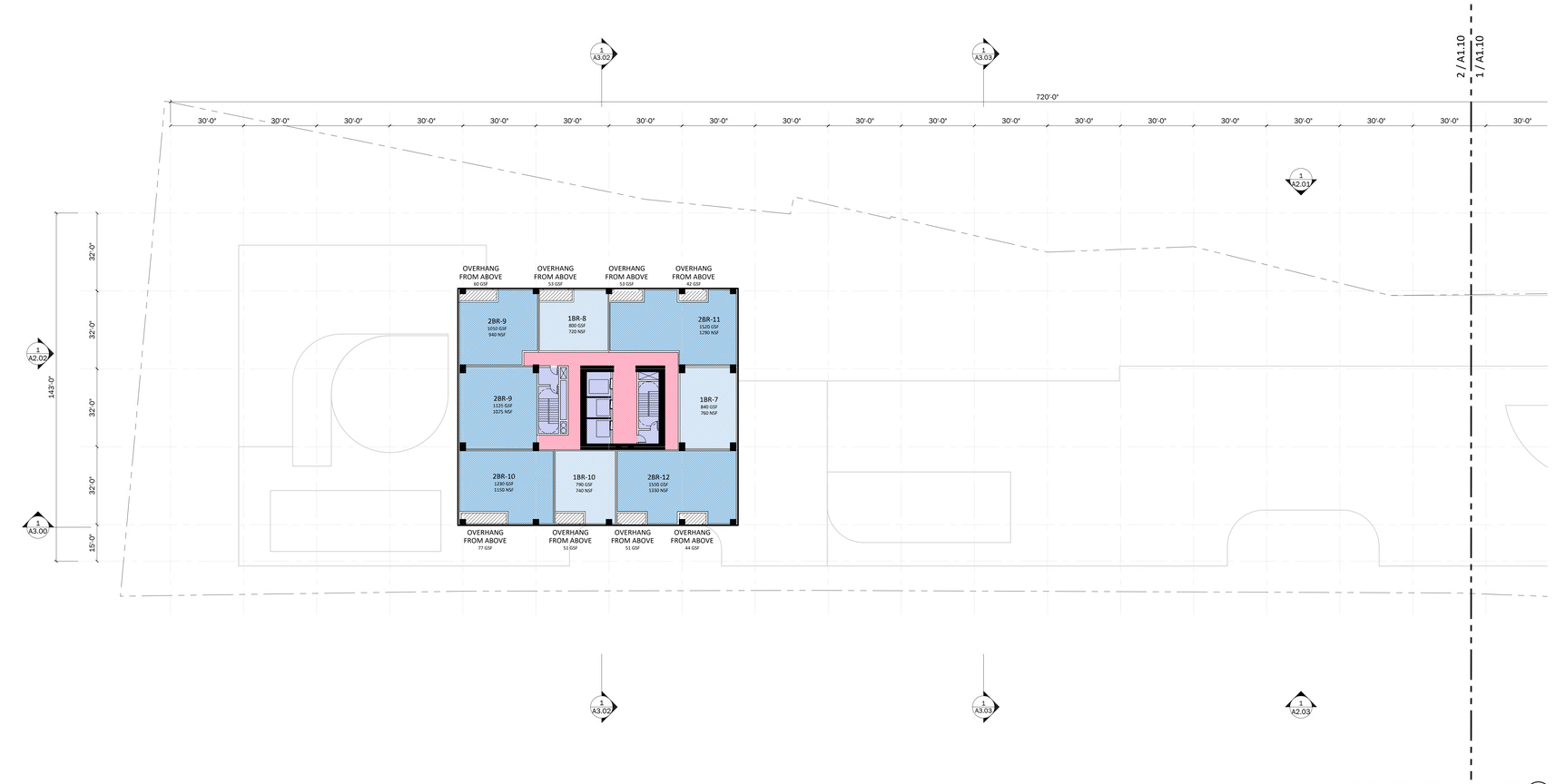
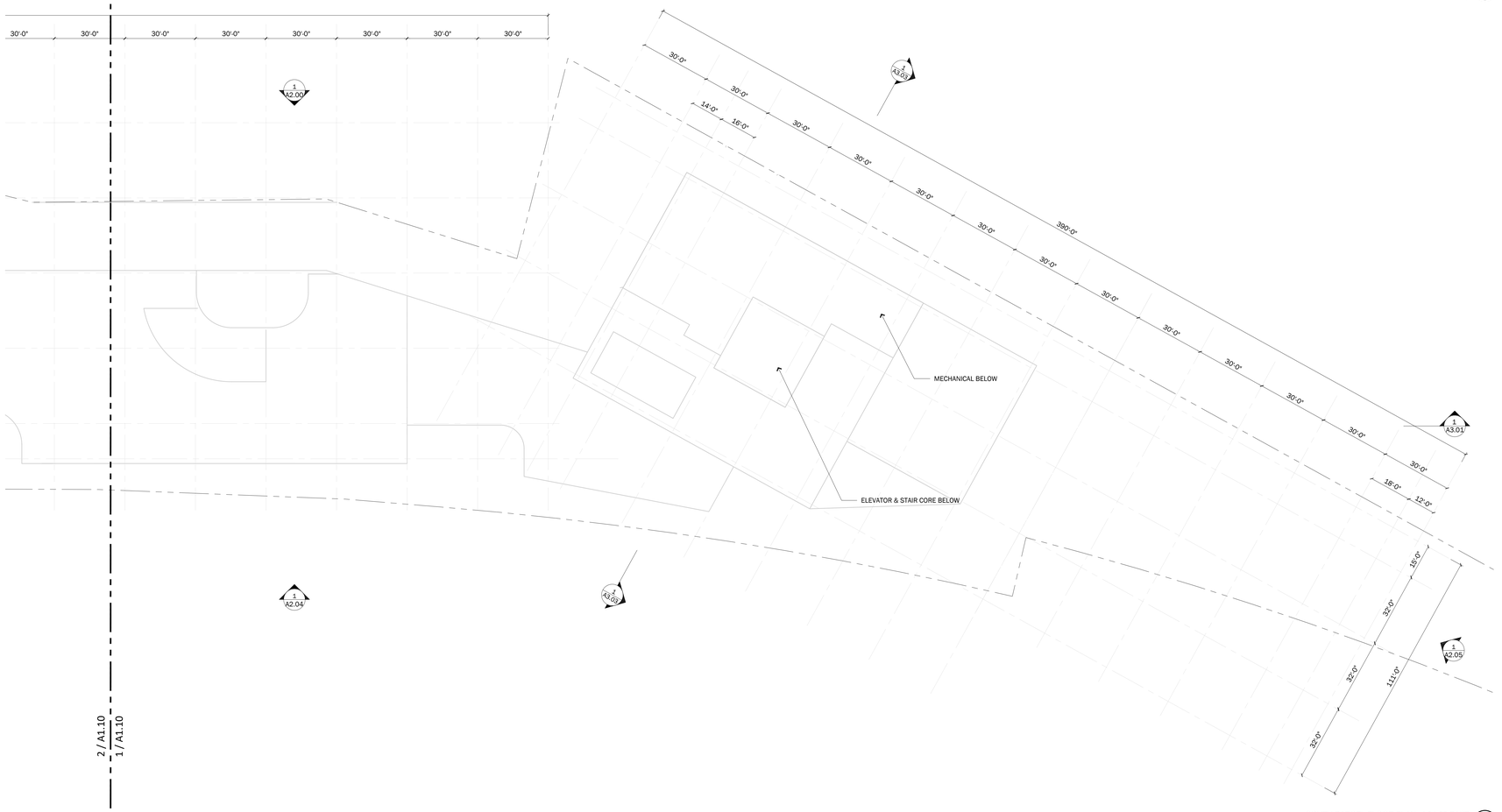


SOUTH PARCEL FLOOR PLAN - L24-25 WEST (2) 1" = 20'

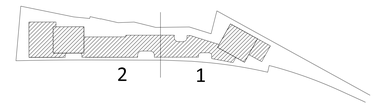


SOUTH PARCEL FLOOR PLAN - L24-25 EAST (1) 1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



LEGEND

RETAIL		STUDIO	x 0
AMENITY / LOBBY		LIVE / WORK	x 0
PARKING		1BR	x 3
SERVICE / MECH RM		2BR	x 5
CORES		3BR	x 0
CIRCULATION			
EARTH			
OVERHANG			

NOTES

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DRAWING TITLE: PLAN - L24-25 SOUTH PARCEL

SCALE: 1" = 20'

DRAWING NO.: A1.10

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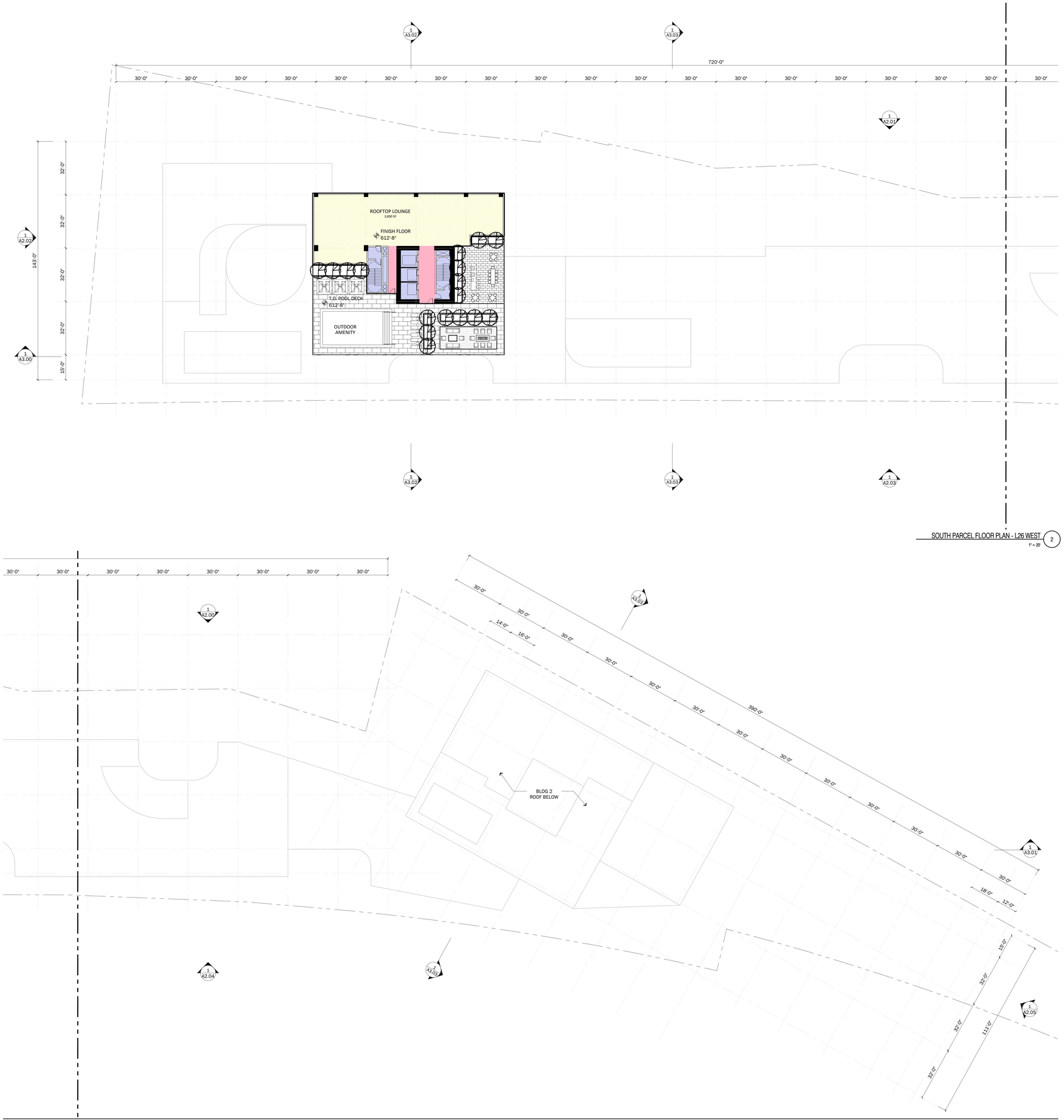


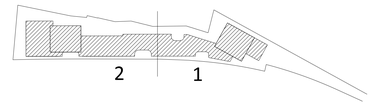
SOUTH PARCEL FLOOR PLAN - L26 WEST (2)
1" = 20'

SOUTH PARCEL FLOOR PLAN - L26 EAST (1)
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG
- STUDIO
- LIVE / WORK
- 1BR
- 2BR
- 3BR

NOTES

NORTH

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DRAWING TITLE: PLAN - L26 SOUTH PARCEL

SCALE: 1" = 20' (WHEN PRINTED ON 30"x42" SHEET)

DRAWING NO.: A1.11

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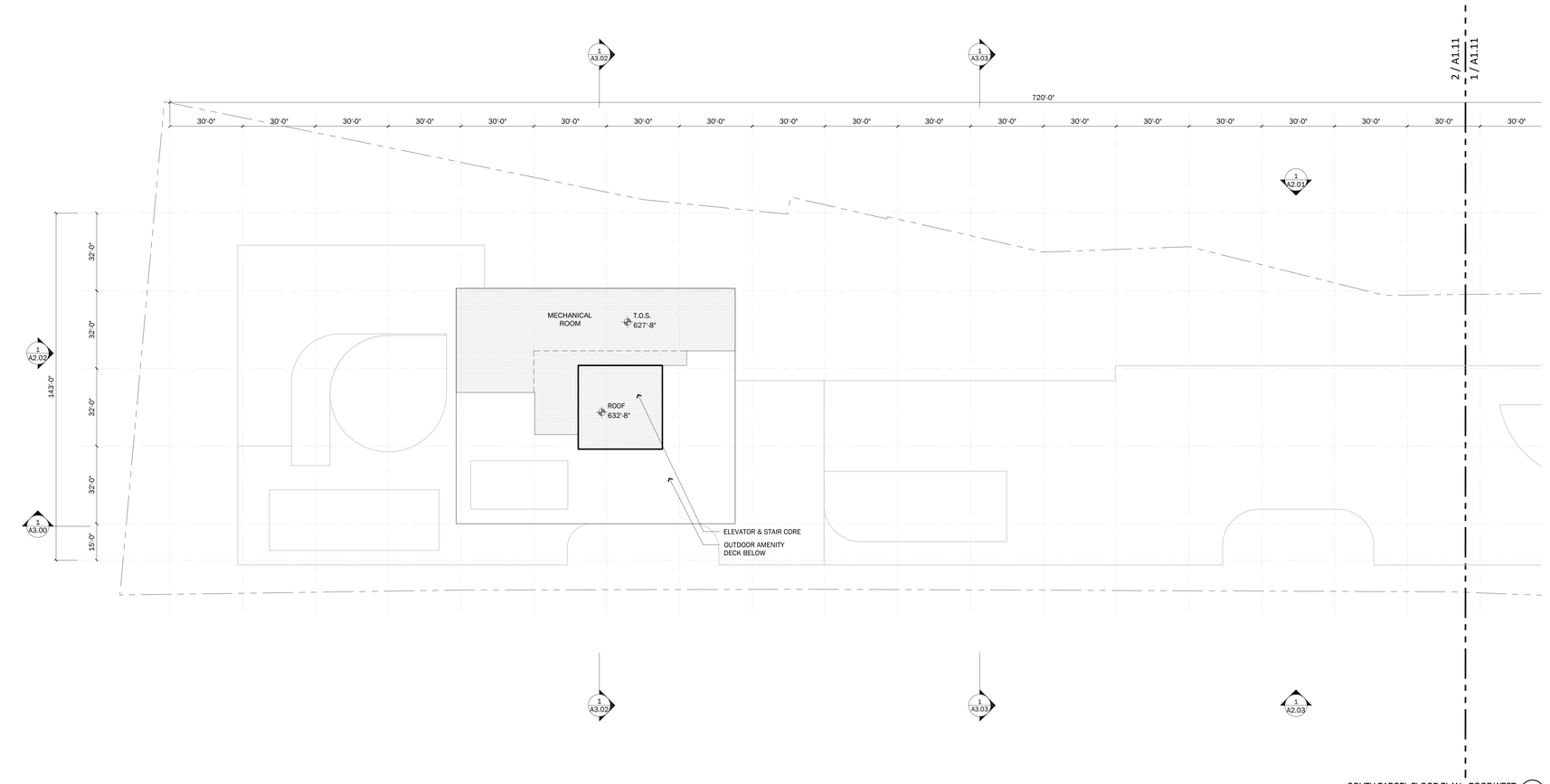
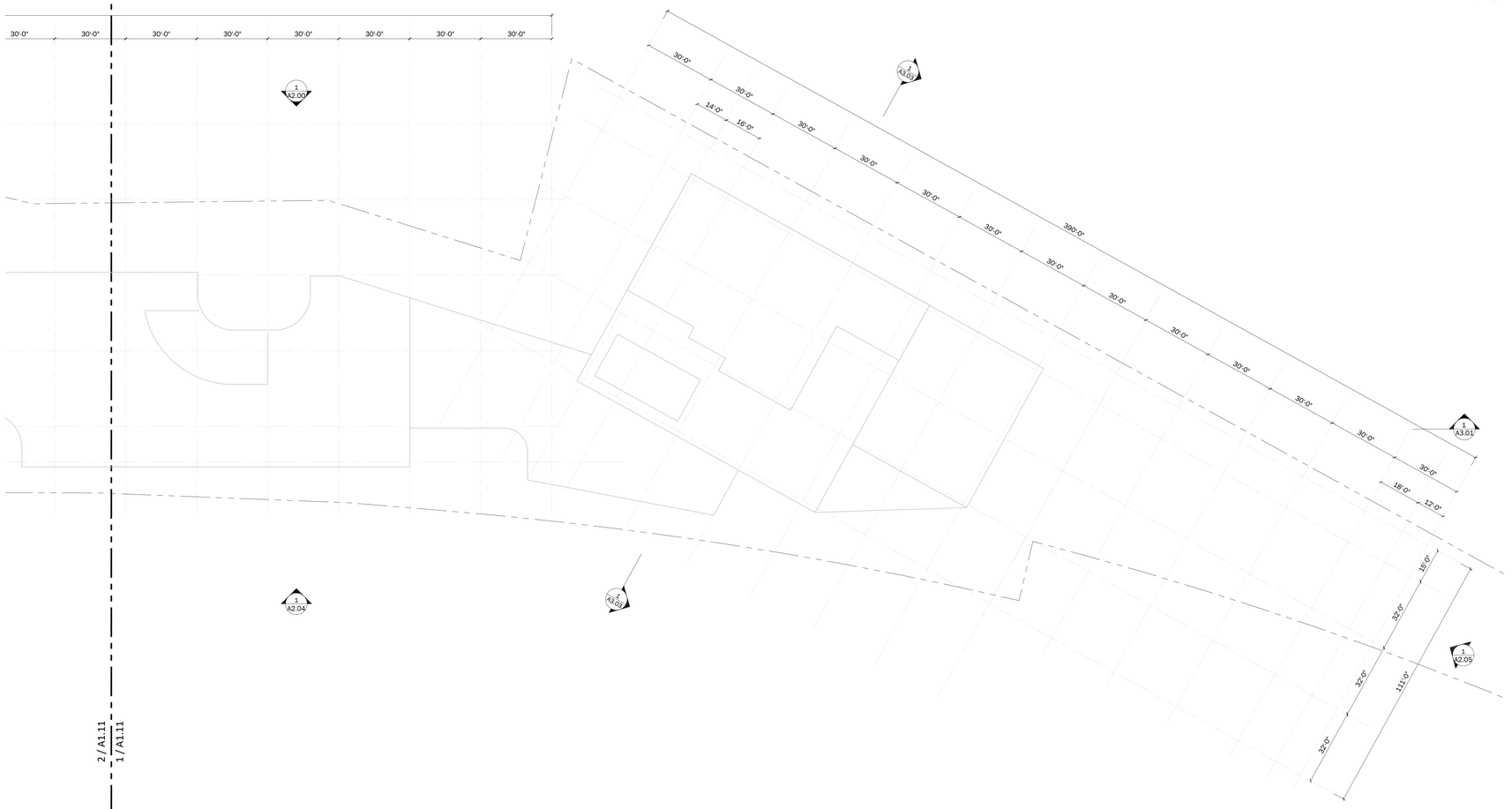


SOUTH PARCEL FLOOR PLAN - ROOF WEST (2)
1" = 20'

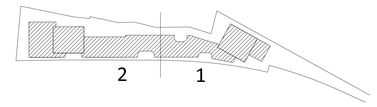


SOUTH PARCEL FLOOR PLAN - ROOF EAST (1)
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG
- STUDIO
- LIVE / WORK
- 1BR
- 2BR
- 3BR

NOTES

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ISSUED: ENTITLEMENT 07/01/2024

DRAWING TITLE: PLAN - ROOF SOUTH PARCEL

SCALE: 1" = 20'

DRAWING NO.: A1.12

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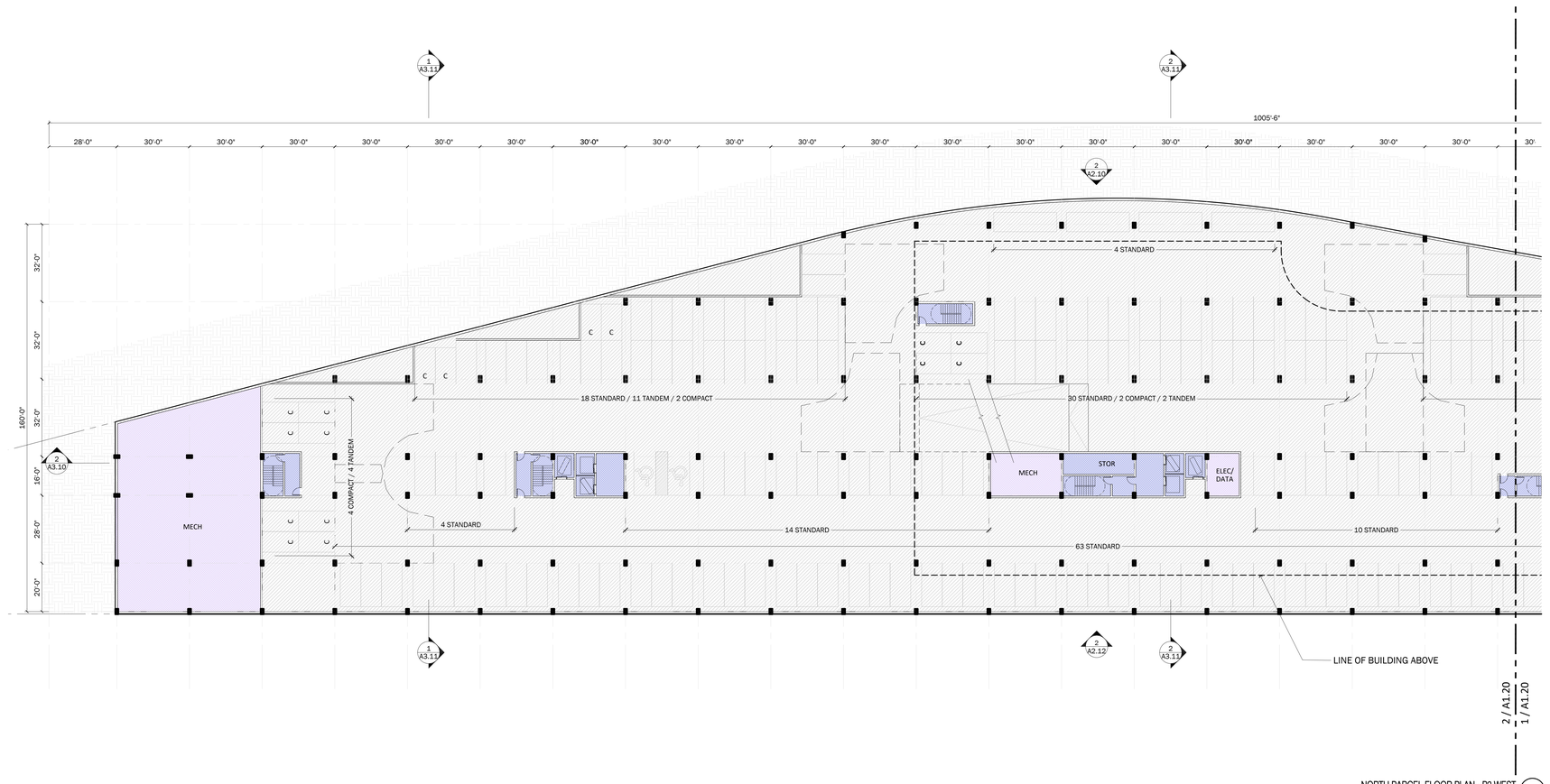
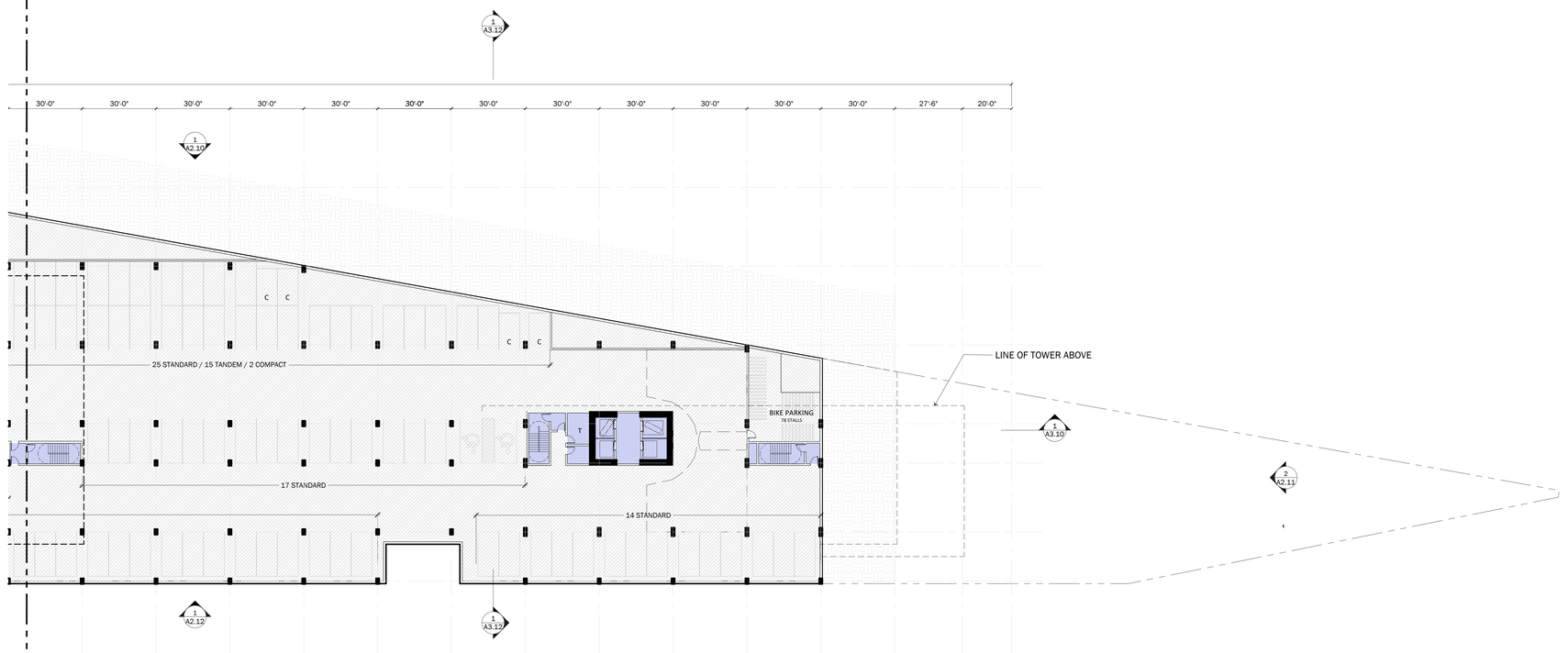


NORTH PARCEL FLOOR PLAN - P3 WEST 2
1" = 20'

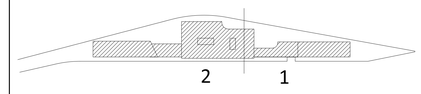


NORTH PARCEL FLOOR PLAN - P3 EAST 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG
- STUDIO
- LIVE / WORK
- 1BR
- 2BR
- 3BR

PARKING SUMMARY

RESIDENTIAL PARKING - P3

STANDARD:	199 TOTAL (0 EVSE, 0 EVCS, 4 ADA, 0 ADA VAN)
COMPACT:	10 TOTAL (0 EVSE, 0 EVCS)
TANDEM:	32 TOTAL (6 COMPACT)
STACKED:	0
BICYCLE - LONG TERM:	78

COMMERCIAL PARKING - P3

STANDARD:	0
COMPACT:	0
TANDEM:	0
STACKED:	0
BICYCLE - LONG TERM:	0

TOTAL PARKING - P3

STANDARD:	199 TOTAL (0 EVSE, 0 EVCS, 4 ADA, 0 ADA VAN)
COMPACT:	10 TOTAL (0 EVSE, 0 EVCS)
TANDEM:	32 TOTAL (6 COMPACT)
STACKED:	0
BICYCLE - LONG TERM:	78

NOTES

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DRAWING TITLE PLAN - P3 NORTH PARCEL

SCALE 1" = 20' WHEN PRINTED ON 24"x36" SHEET

DRAWING NO. A1.20

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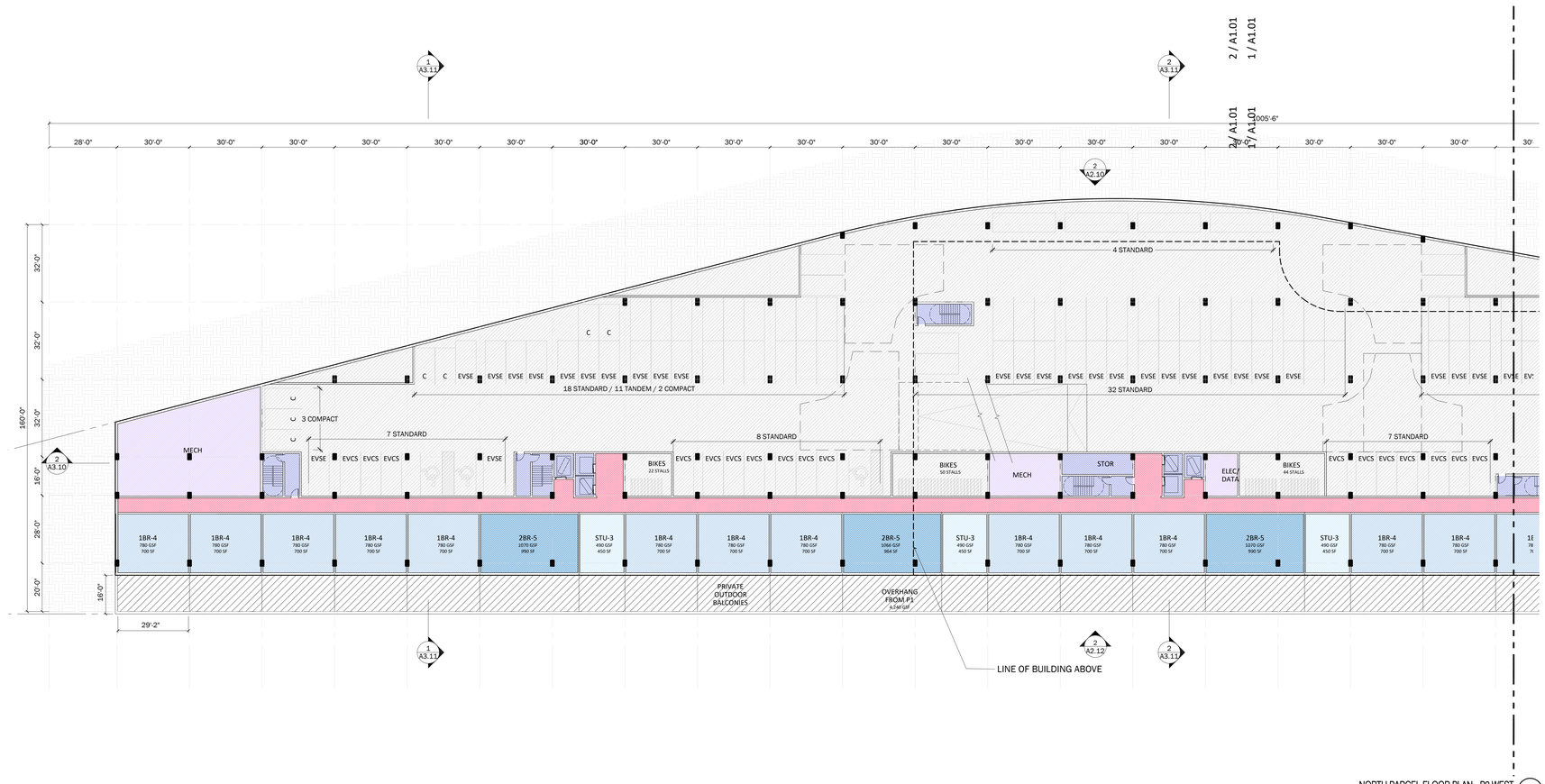
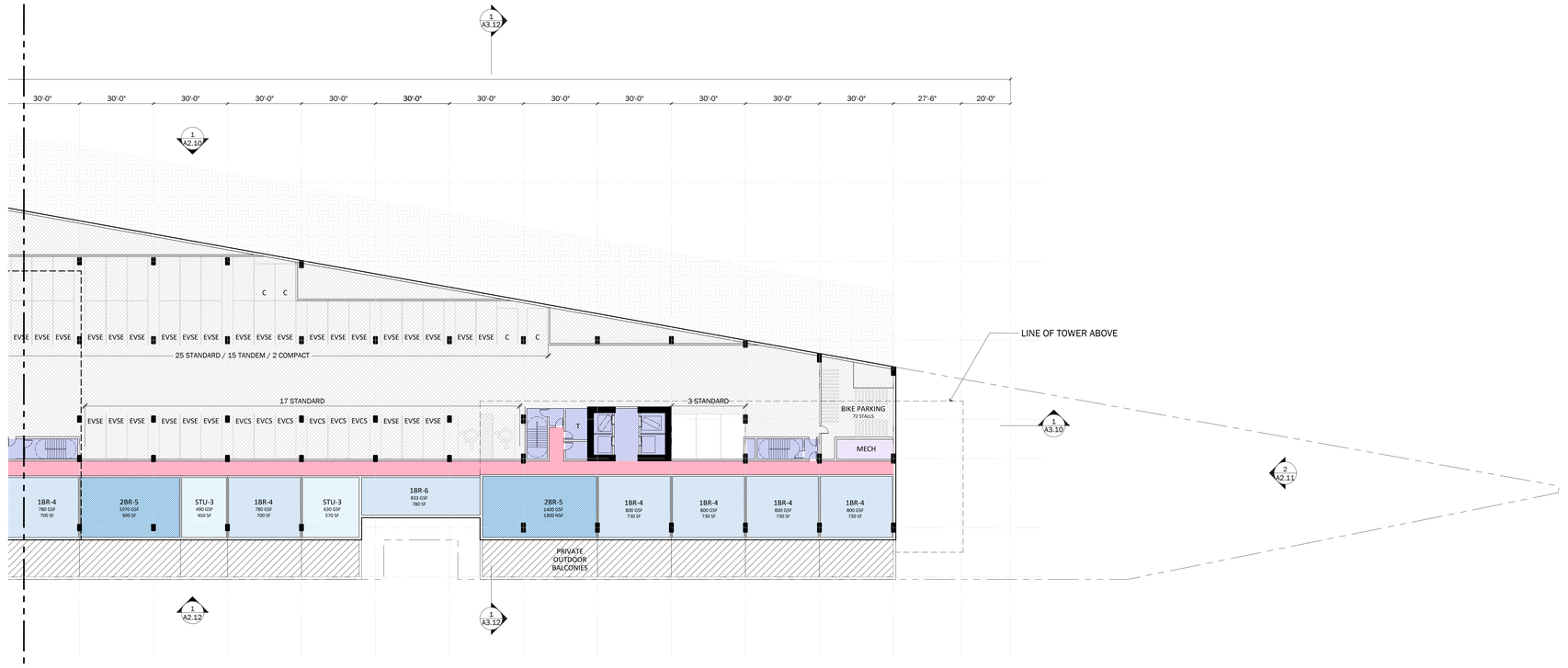


NORTH PARCEL FLOOR PLAN - P2 WEST

1" = 20'



NORTH PARCEL FLOOR PLAN - P3 EAST

1" = 20'

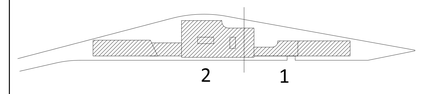
KEYPLAN: SITE

1" = 500'



KEYPLAN: NORTH PARCEL

1" = 200'



LEGEND

RETAIL		STUDIO	x 5
AMENITY / LOBBY		LIVE / WORK	x 0
PARKING		1BR	x 19
SERVICE / MECH RM		2BR	x 5
CORES		3BR	x 0
CIRCULATION			
EARTH			
OVERHANG			

PARKING SUMMARY

RESIDENTIAL PARKING - P2

STANDARD:	121 TOTAL (57 EVSE, 23 EVCS, 5 ADA, 0 ADA VAN)
COMPACT:	7
TANDEM:	26 TOTAL (4 COMPACT)
STACKED:	0
BICYCLE - LONG TERM:	188

COMMERCIAL PARKING - P2

STANDARD:	0
COMPACT:	0
TANDEM:	0
STACKED:	0
BICYCLE - LONG TERM:	0

TOTAL PARKING - P2

STANDARD:	121 TOTAL (57 EVSE, 23 EVCS, 5 ADA, 0 ADA VAN)
COMPACT:	7
TANDEM:	26 TOTAL (4 COMPACT)
STACKED:	0
BICYCLE - LONG TERM:	188

NOTES

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ISSUED: ENTITLEMENT 07/01/2024

DRAWING TITLE: PLAN - P2
NORTH PARCEL

SCALE: 1" = 20'
WHEN PRINTED ON 30"x42" SHEET

DRAWING NO: A1.21

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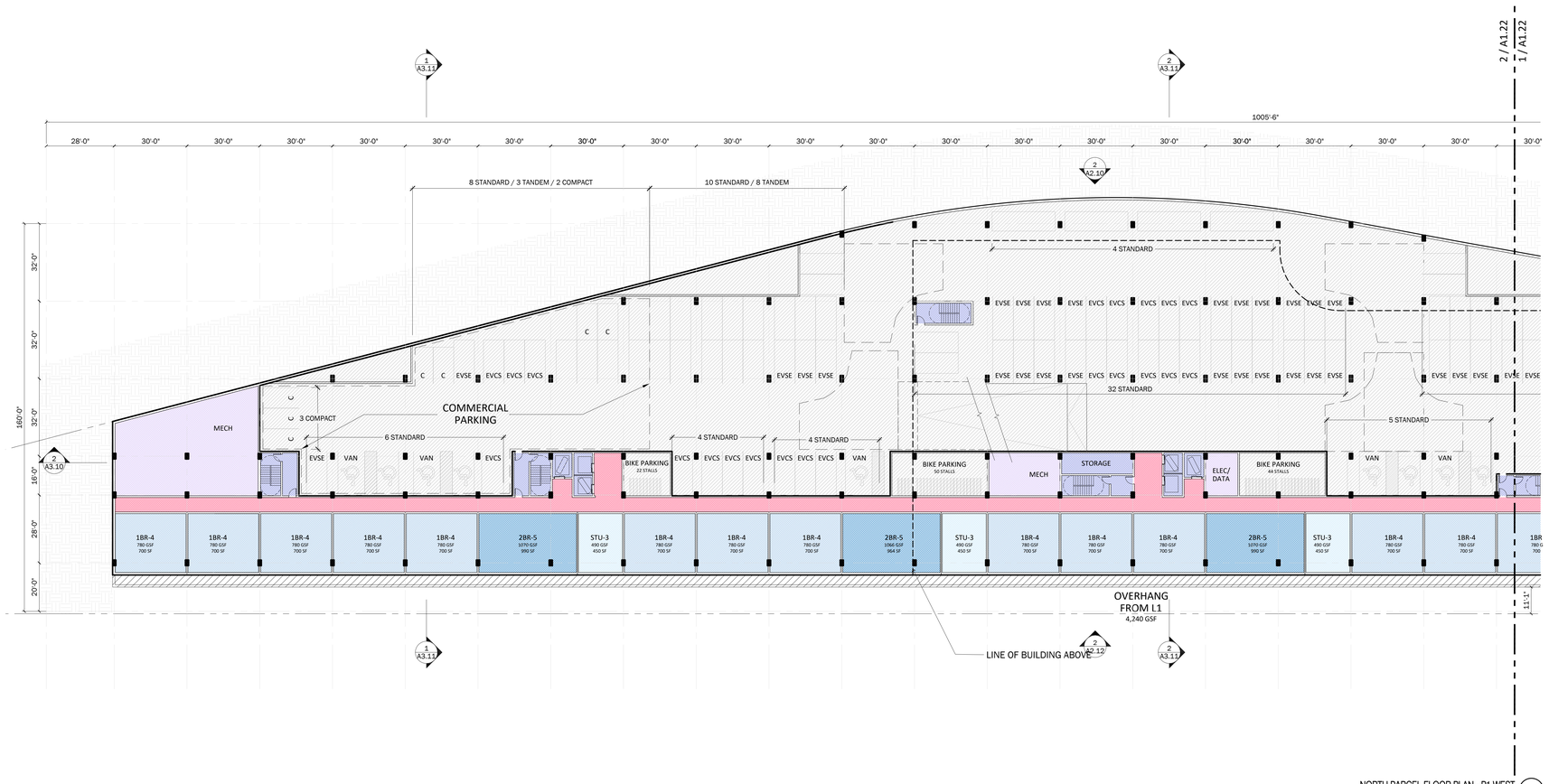
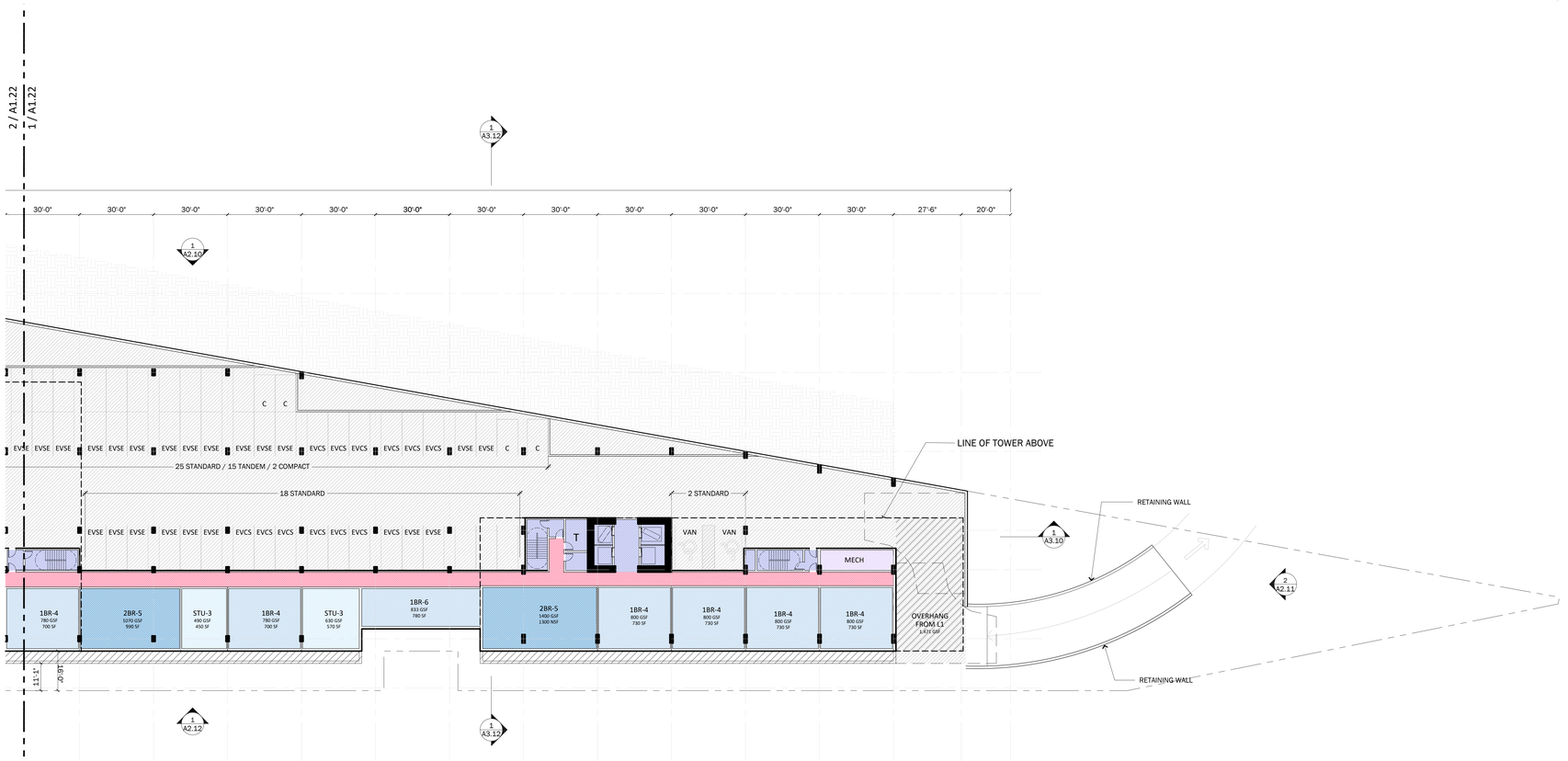


NORTH PARCEL FLOOR PLAN - P1 WEST (2)
1" = 20'

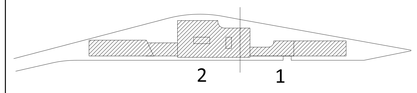


NORTH PARCEL FLOOR PLAN - P1 EAST (1)
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



LEGEND

RETAIL		STUDIO	x 5
AMENITY / LOBBY		LIVE / WORK	x 0
PARKING		1BR	x 19
SERVICE / MECH RM		2BR	x 5
CORES		3BR	x 0
CIRCULATION			
EARTH			
OVERHANG			

PARKING SUMMARY

RESIDENTIAL PARKING - P1

STANDARD:	104 TOTAL (48 EVSE, 30 EVCS, 2 ADA, 5 ADA VAN)
COMPACT:	2
TANDEM:	23 TOTAL (1 COMPACT)
STACKED:	0
BICYCLE - LONG TERM:	94

COMMERCIAL PARKING - P1

STANDARD:	14 TOTAL (2 EVSE, 4 EVCS, 2 ADA, 2 ADA VAN)
COMPACT:	5
TANDEM:	3 TOTAL (2 COMPACT)
STACKED:	0
BICYCLE - LONG TERM:	22

TOTAL PARKING - P1

STANDARD:	118 TOTAL (50 EVSE, 34 EVCS, 4 ADA, 7 ADA VAN)
COMPACT:	7
TANDEM:	26 TOTAL (3 COMPACT)
STACKED:	0
BICYCLE - LONG TERM:	116

NOTES

NORTH

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FAX: 323.785.1801
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PROJECT ID: 18046

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ISSUES
ENTITLEMENT 07/01/2024

DRAWING TITLE: PLAN - P1 NORTH PARCEL

SCALE: 1/32"=1'-0" WHEN PRINTED ON 24"X36" SHEET

DRAWING NO: A1.22

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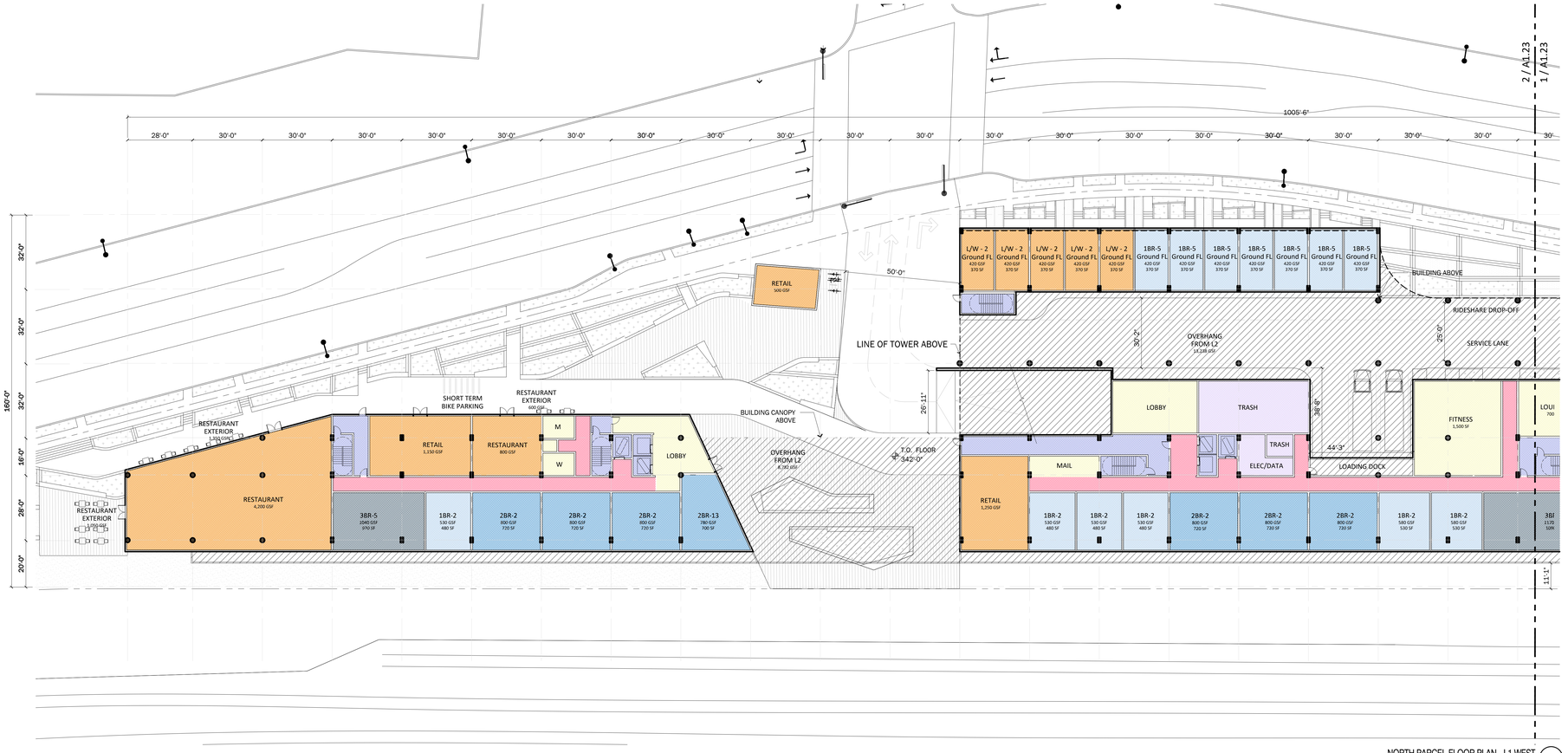
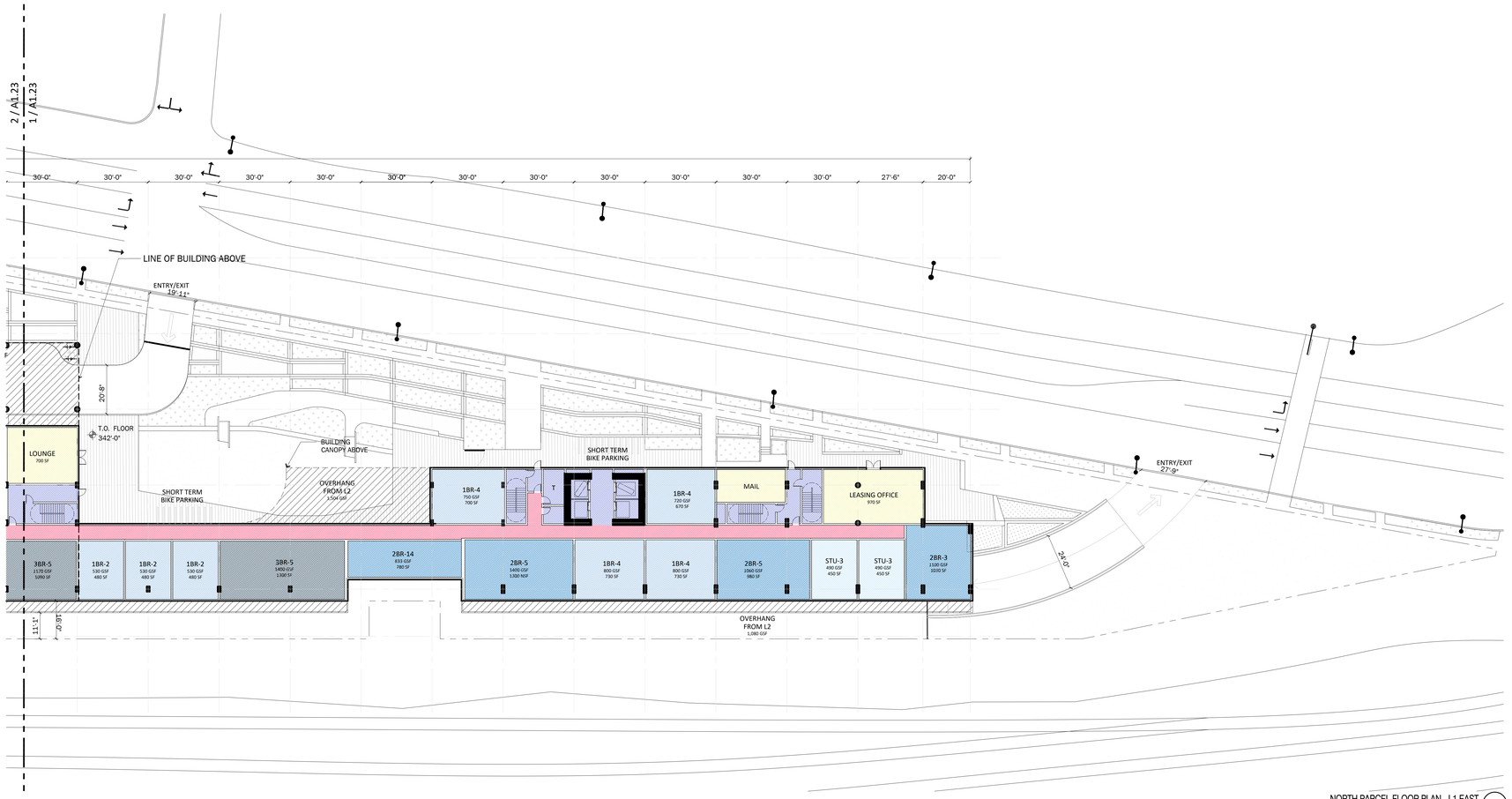




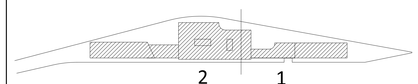
KEYPLAN: SITE

1" = 500'



KEYPLAN: NORTH PARCEL

1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG
- STUDIO x 2
- LIVE / WORK x 5
- 1BR x 20
- 2BR x 11
- 3BR x 3

NOTES

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ISSUES
ENTITLEMENT 07/01/2024

DRAWING TITLE
PLAN - L1
NORTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 30"x42" SHEET

DRAWING NO. A1.23

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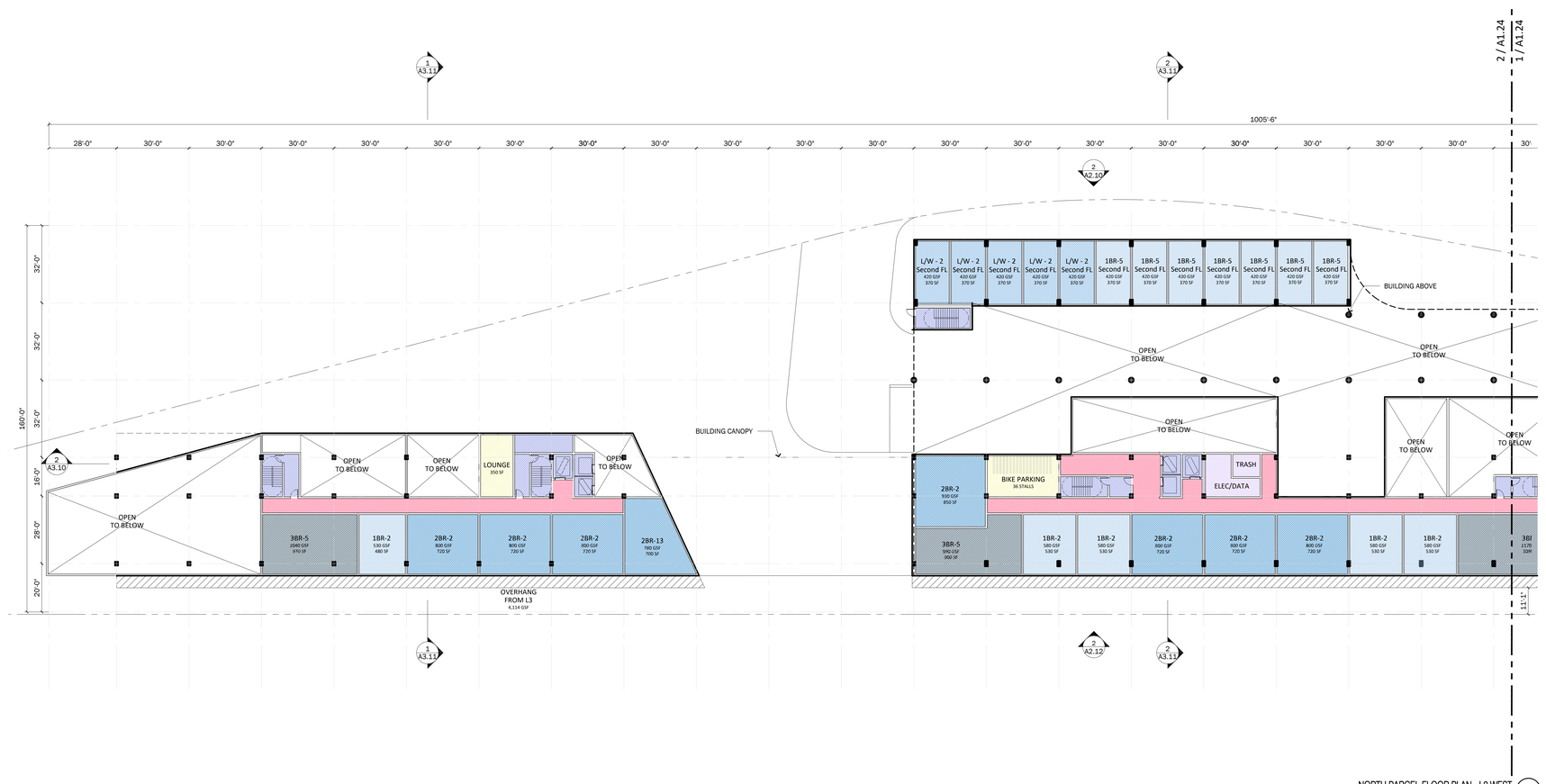
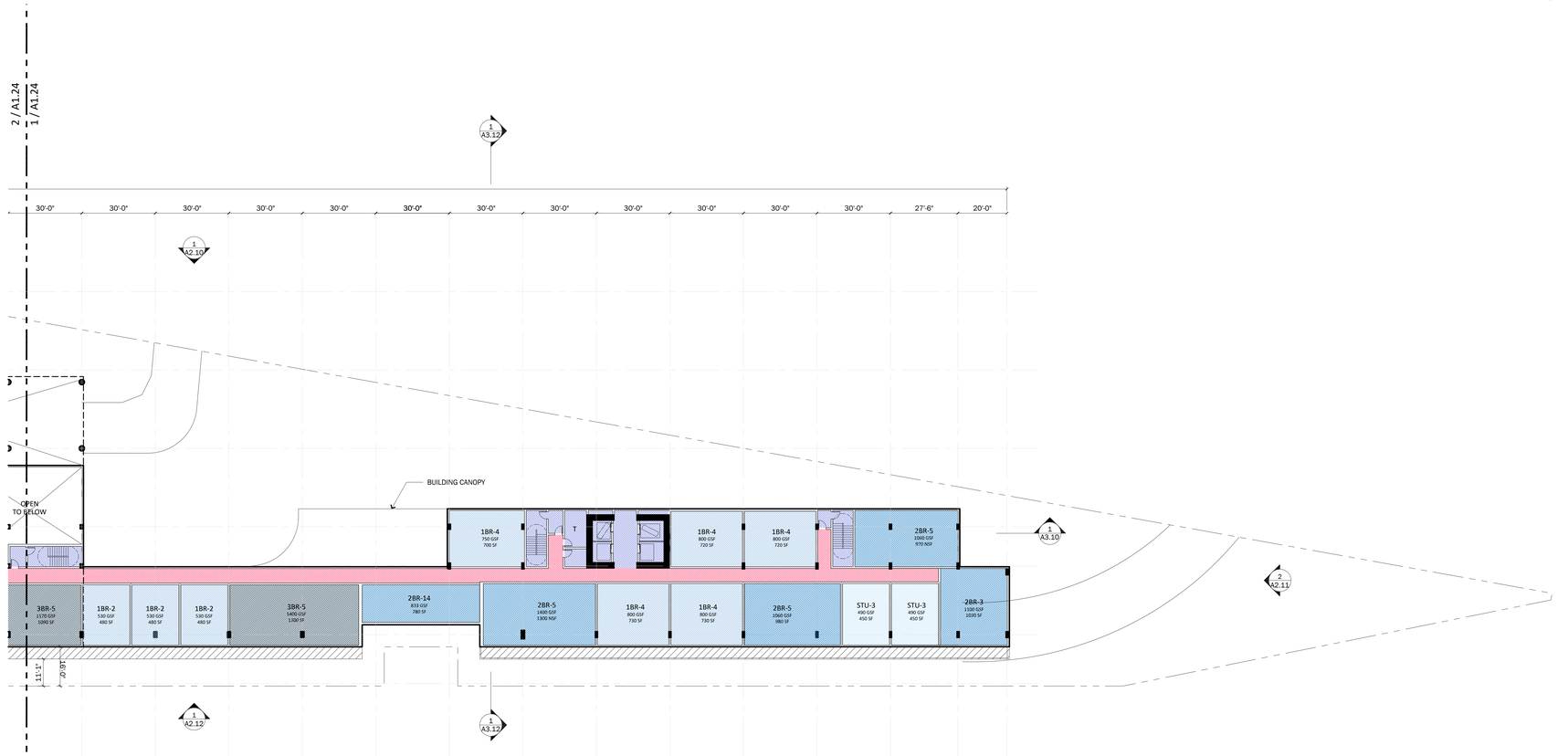


NORTH PARCEL FLOOR PLAN - L2 WEST 2
1" = 20'

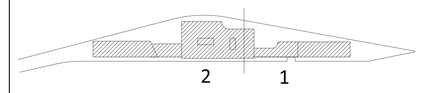


NORTH PARCEL FLOOR PLAN - L2 EAST 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG
- STUDIO x 2
- LIVE / WORK x 0
- 1BR x 13
- 2BR x 13
- 3BR x 4

NOTES

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DRAWING TITLE
PLAN - L2
NORTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 24"x36" SHEETS

DRAWING NO. A1.24

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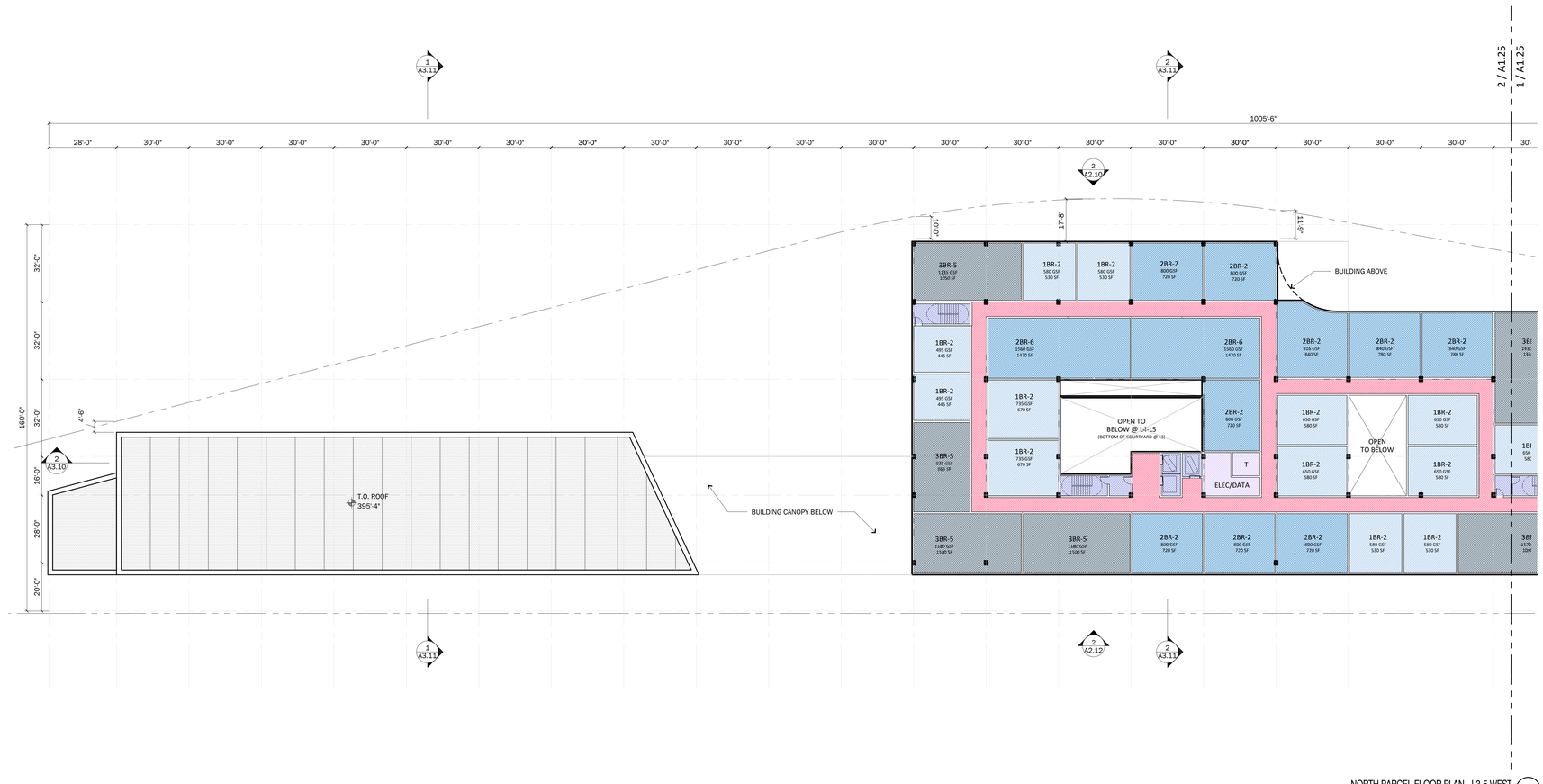
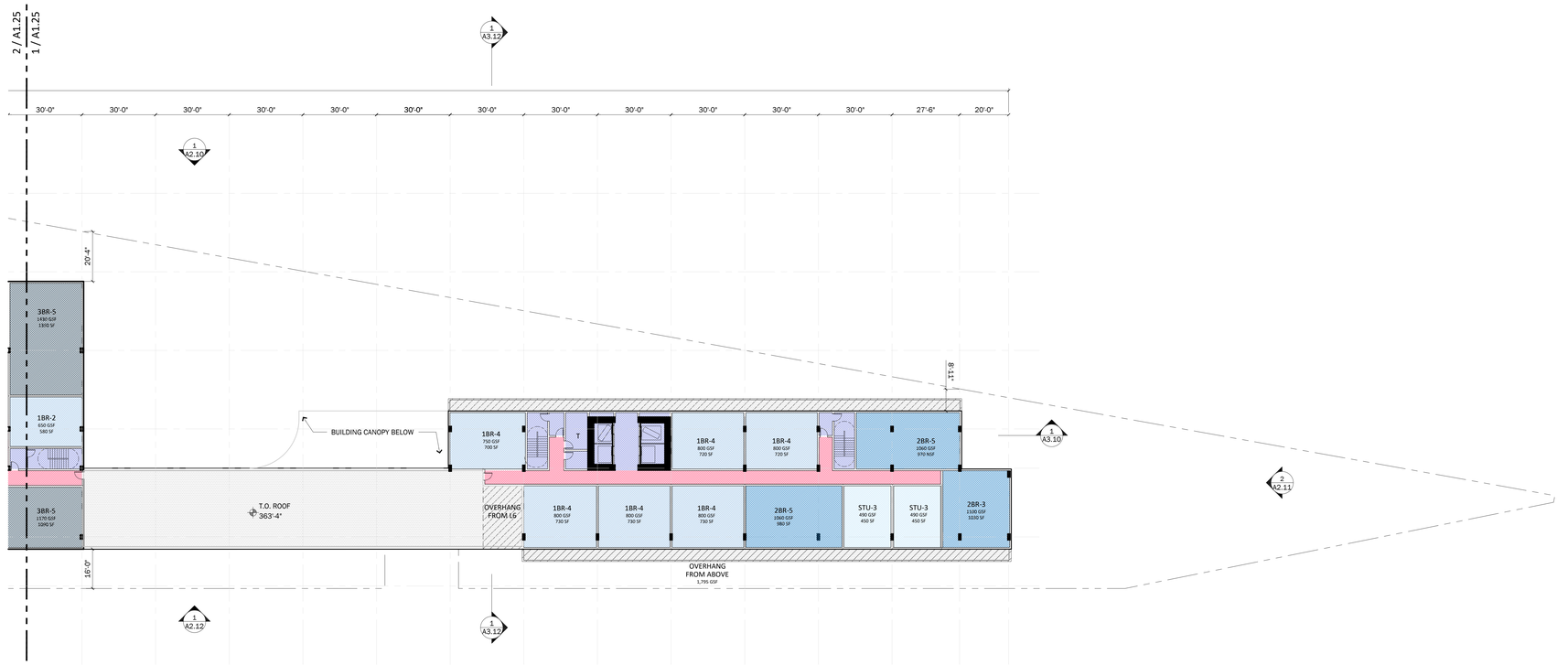


NORTH PARCEL FLOOR PLAN - L3-5 WEST
1" = 20'
2

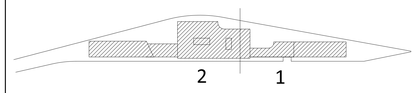


NORTH PARCEL FLOOR PLAN - L3-5 EAST
1" = 20'
1

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG

STUDIO	x 2
LIVE / WORK	x 0
1BR	x 19
2BR	x 14
3BR	x 6

NOTES

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DRAWING TITLE
PLAN - L3-5
NORTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 30"x42" SHEET

DRAWING NO. A1.25

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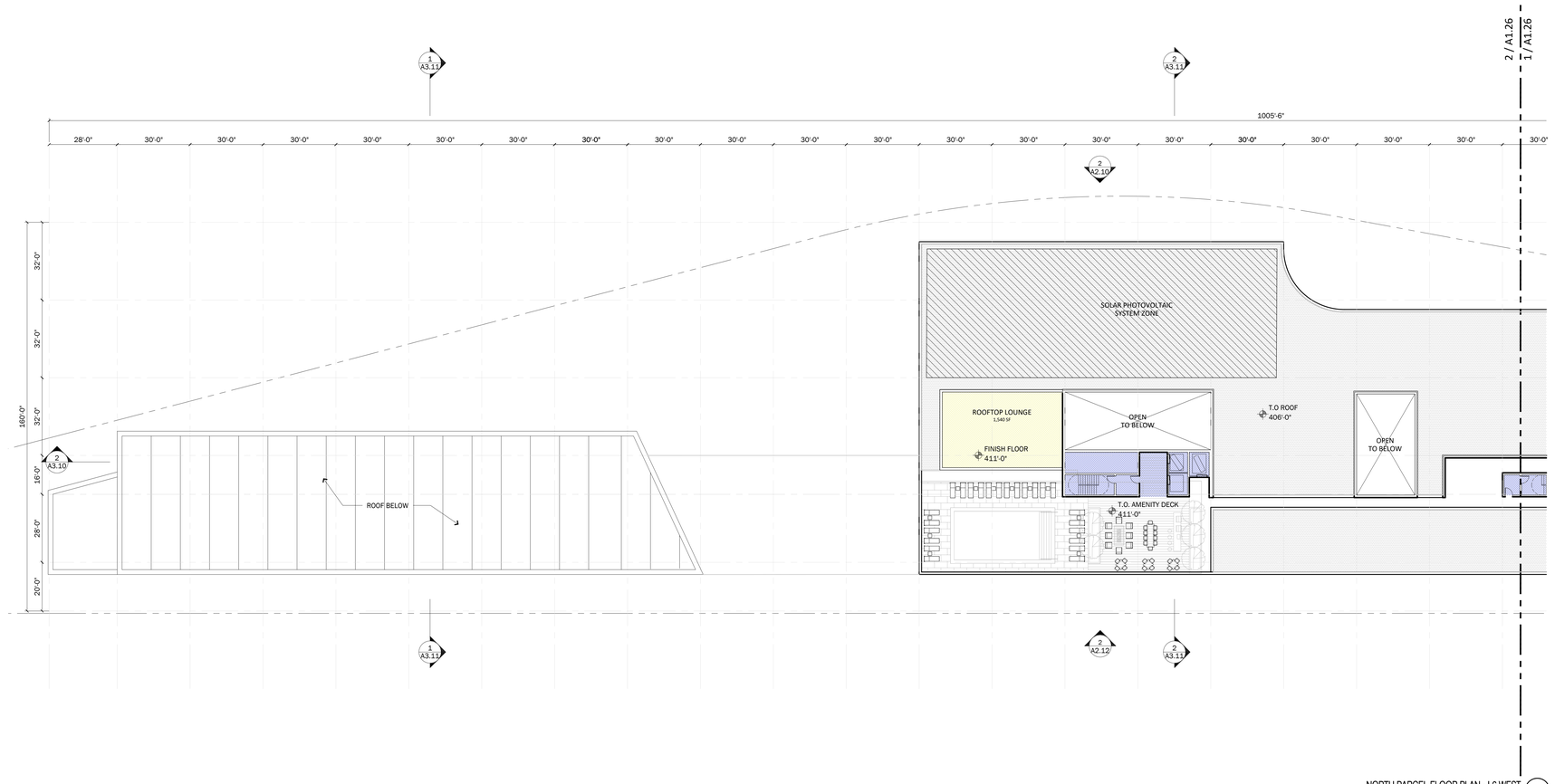
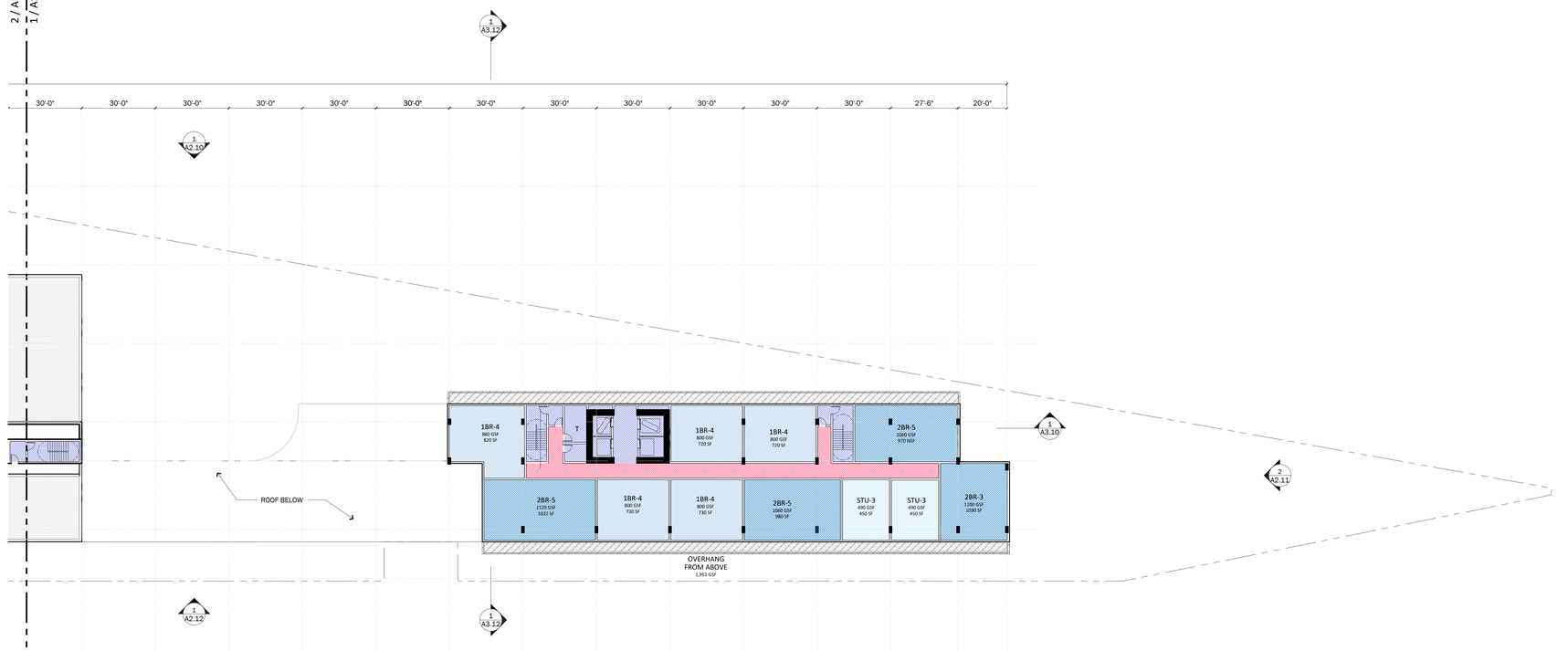


NORTH PARCEL FLOOR PLAN - L6 WEST 2
1" = 20'

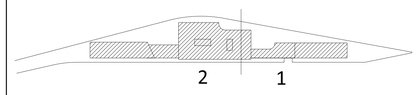


NORTH PARCEL FLOOR PLAN - L6 EAST 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



LEGEND

RETAIL		STUDIO	x 2
AMENITY / LOBBY		LIVE / WORK	x 0
PARKING		1BR	x 5
SERVICE / MECH RM		2BR	x 4
CORES		3BR	x 0
CIRCULATION			
EARTH			
OVERHANG			

NOTES

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DRAWING TITLE
PLAN - L6
NORTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 24"X36" SHEET

DRAWING NO.
A1.26

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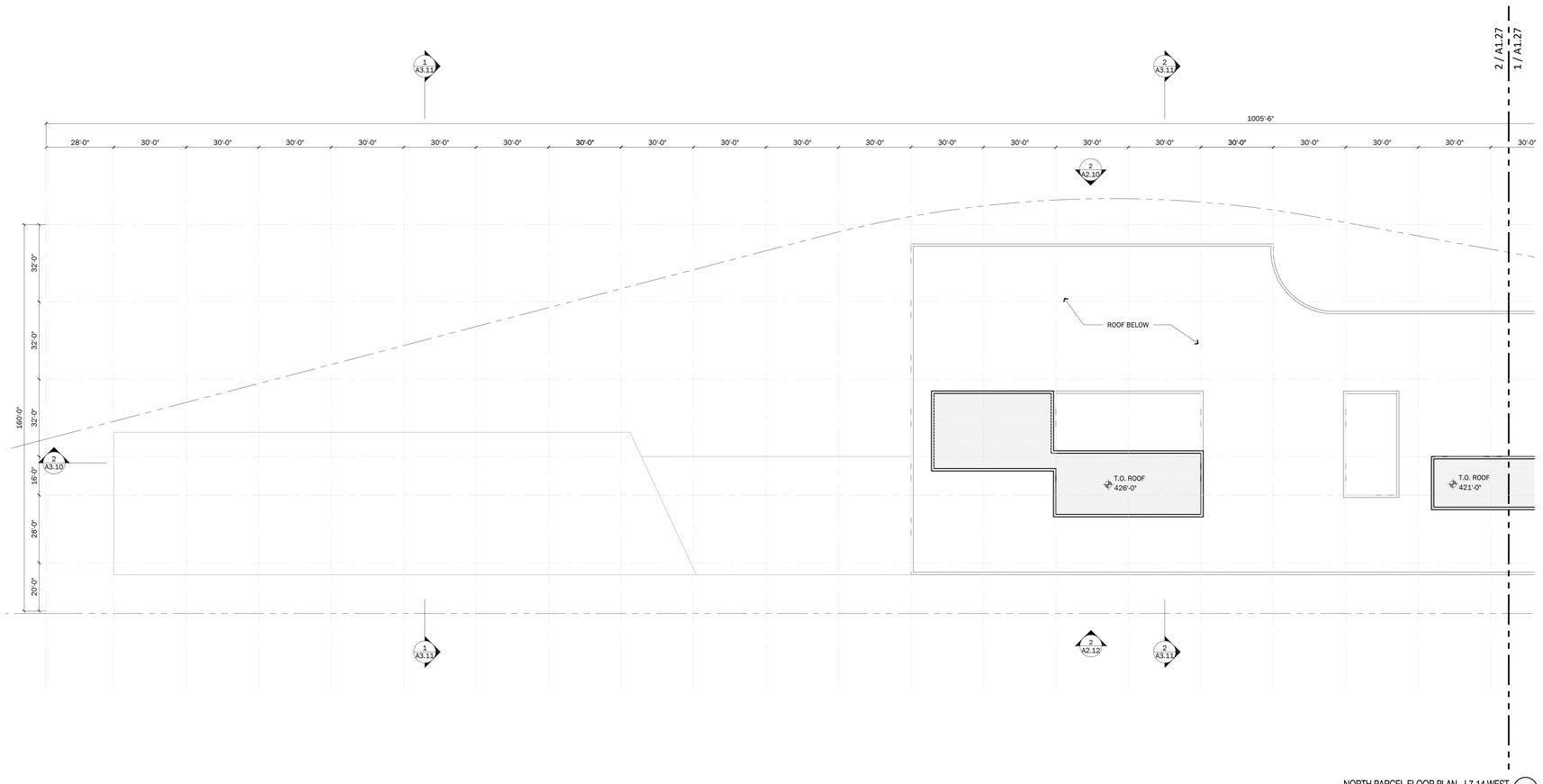
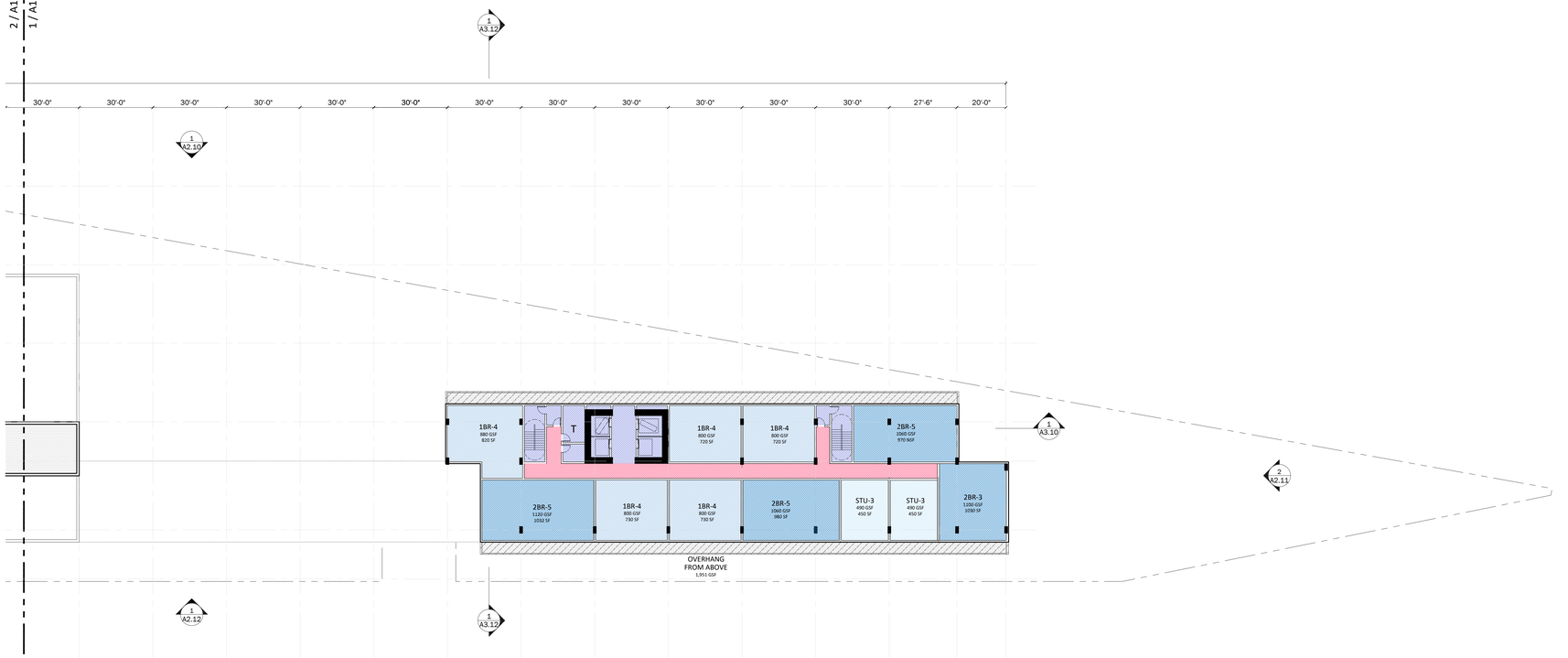


NORTH PARCEL FLOOR PLAN - L7-14 WEST
1" = 20'
2

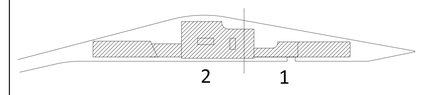


NORTH PARCEL FLOOR PLAN - L7-14 EAST
1" = 20'
1

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



LEGEND

RETAIL		STUDIO	x 2
AMENITY / LOBBY		LIVE / WORK	x 0
PARKING		1BR	x 5
SERVICE / MECH RM		2BR	x 4
CORES		3BR	x 0
CIRCULATION			
EARTH			
OVERHANG			

NOTES

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DRAWING TITLE
PLAN - L7-14
NORTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 30"X42" SHEET

DRAWING NO.
A1.27

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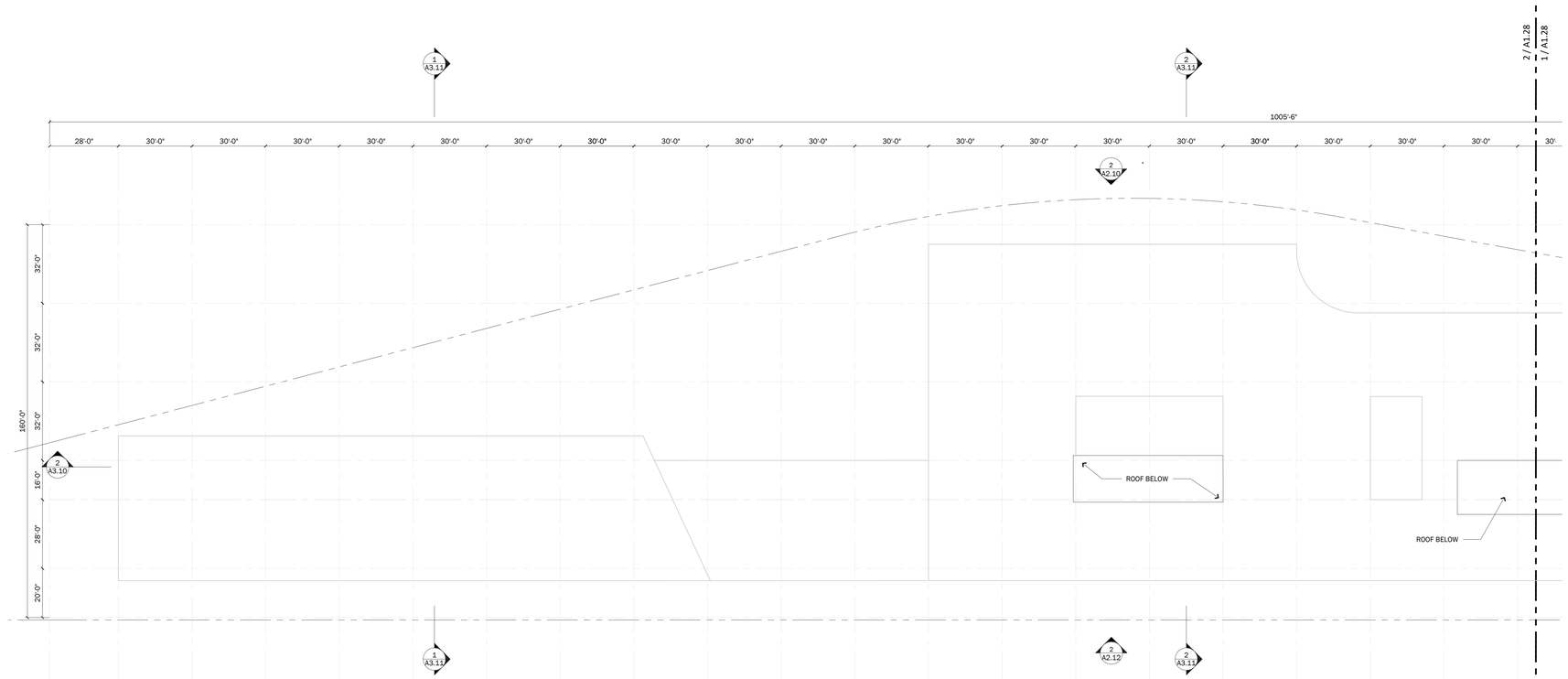
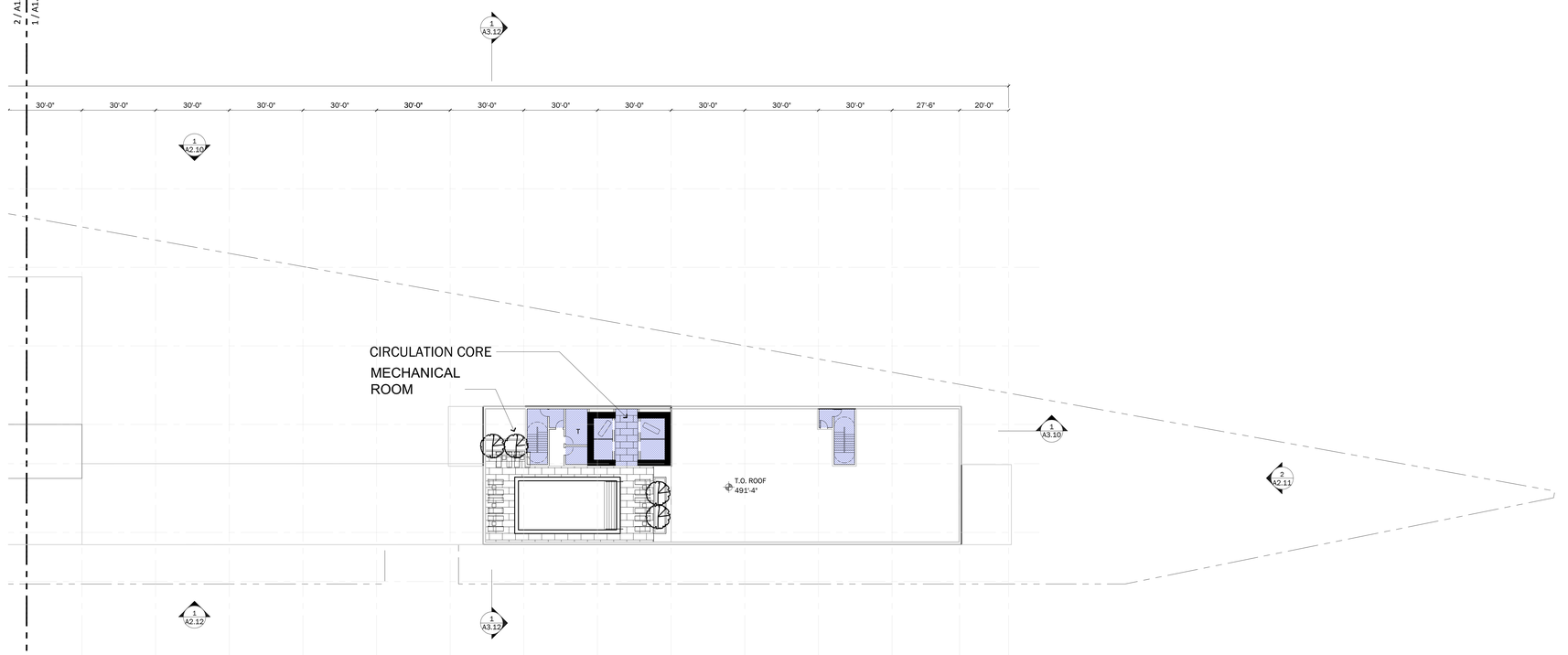


NORTH PARCEL FLOOR PLAN - L7-14 WEST 2
1" = 20'

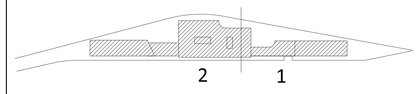


NORTH PARCEL FLOOR PLAN - L7-14 EAST 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG
- STUDIO
- LIVE / WORK
- 1BR
- 2BR
- 3BR

NOTES

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	ENTITLEMENT	07/01/2024

DRAWING TITLE
PLAN - L15
NORTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 30"x42" SHEET

DRAWING NO.
A1.28

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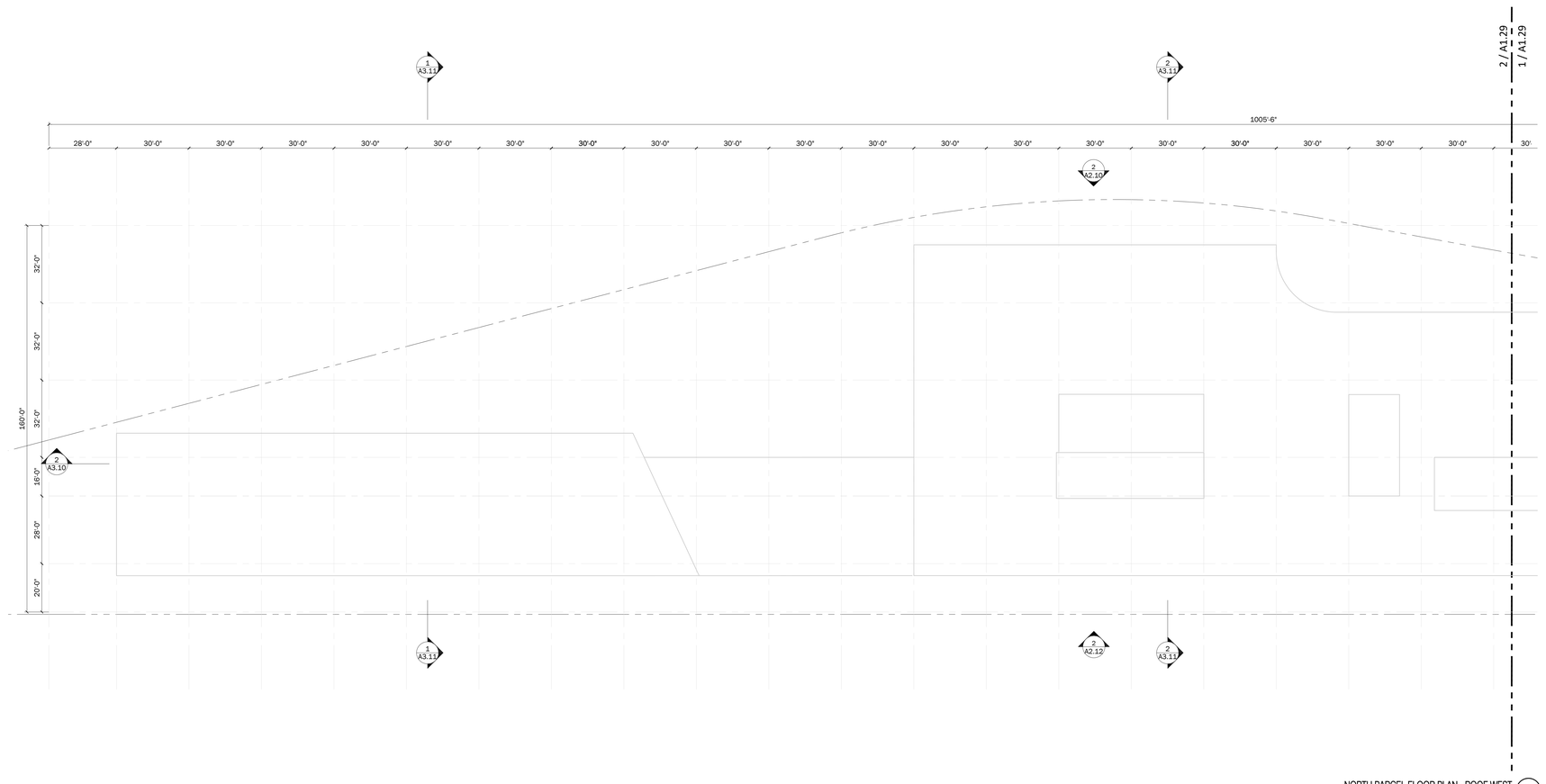
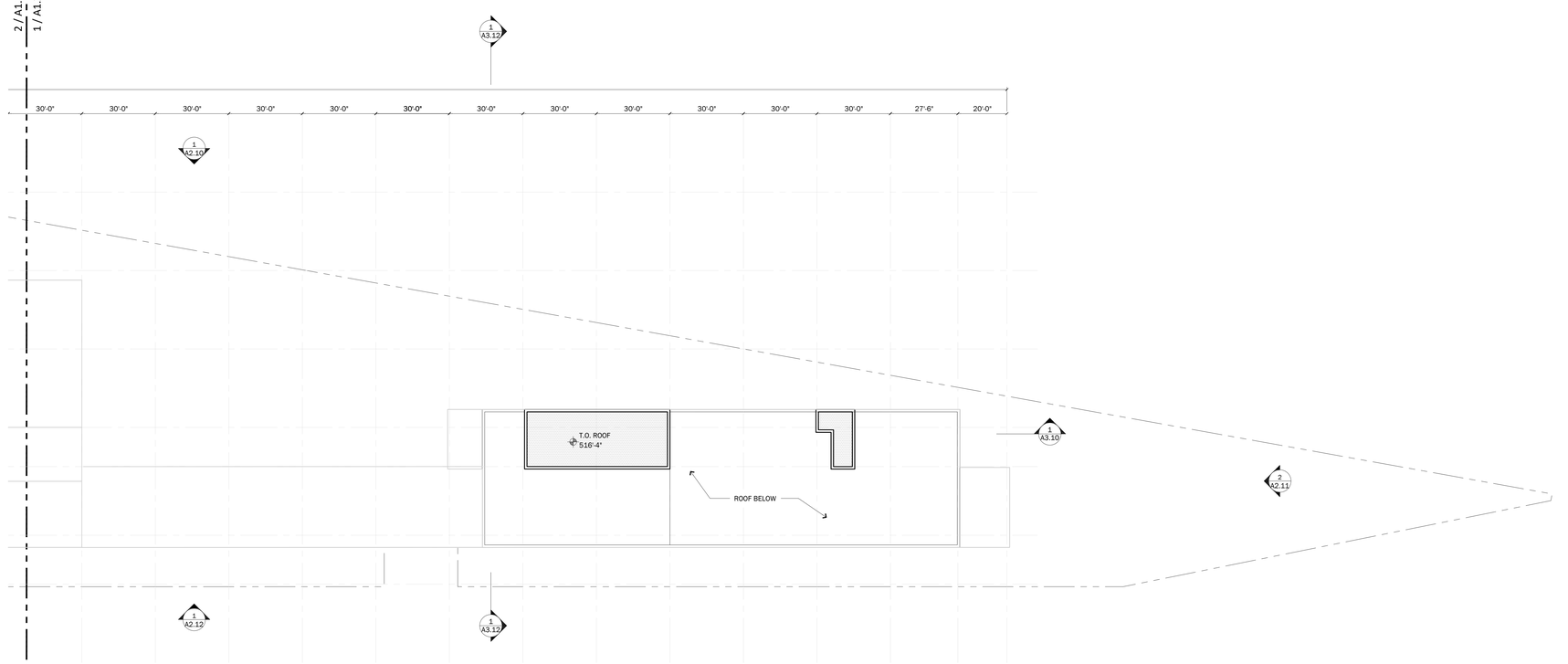


NORTH PARCEL FLOOR PLAN - ROOF WEST 2
1" = 20'

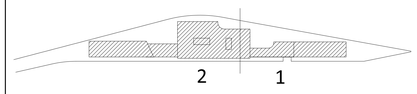


NORTH PARCEL FLOOR PLAN - ROOF EAST 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



LEGEND

- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- CIRCULATION
- EARTH
- OVERHANG
- STUDIO
- LIVE / WORK
- 1BR
- 2BR
- 3BR

NOTES

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DRAWING TITLE
PLAN - ROOF
NORTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 30"x42" SHEET

DRAWING NO. A1.29

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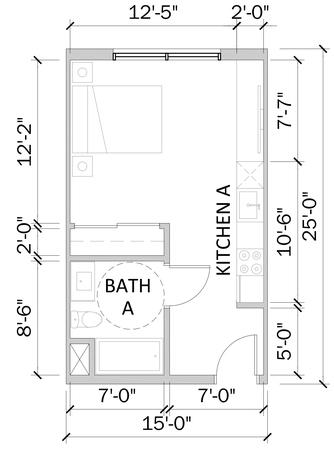
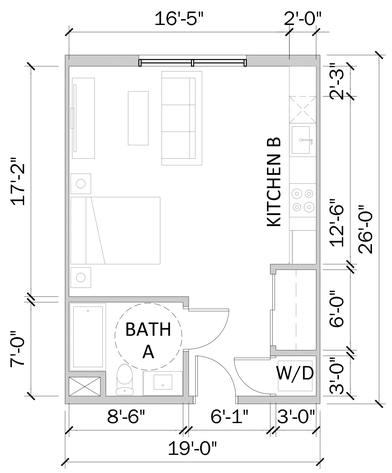
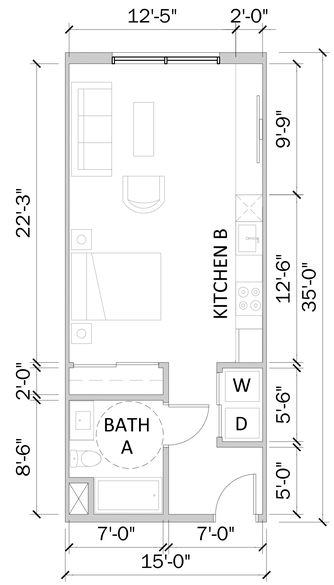


TYPICAL UNIT PLAN - STU-2 (2)
1/4" = 1'-0"



TYPICAL UNIT PLAN - STU-3 (3)
1/4" = 1'-0"



TYPICAL UNIT PLAN - STU-1 (1)
1/4" = 1'-0"

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DRAWING TITLE
PLAN - TYPICAL UNITS - STUDIO

SCALE AS NOTE
1/4"=1'-0"
WHEN PRINTED ON 30"x42" SHEETS

DRAWING NO.
A1.40

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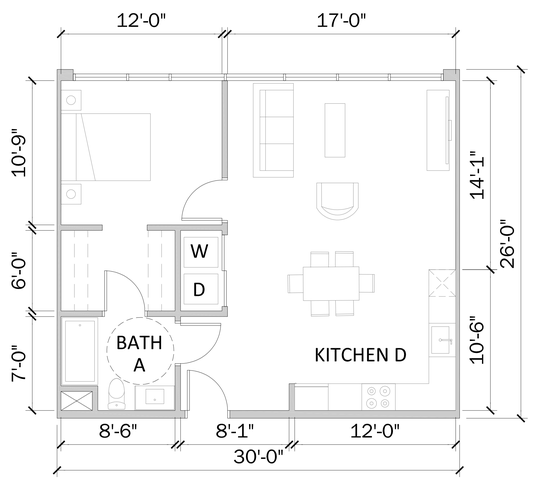
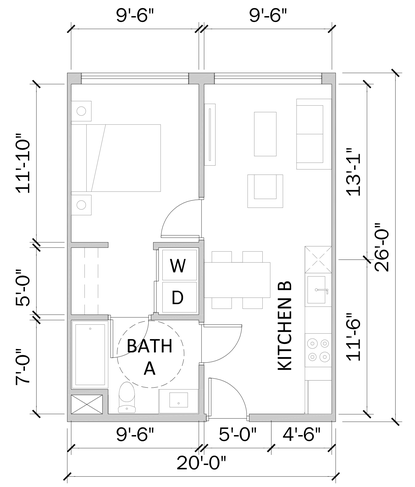
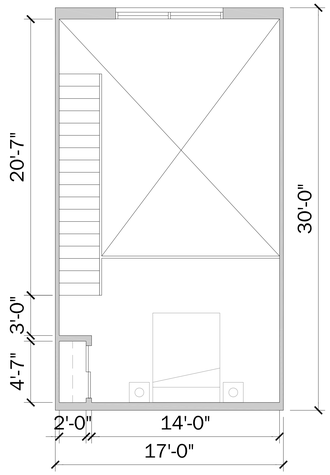


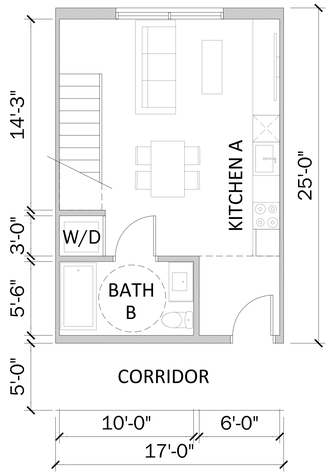
TYPICAL UNIT PLAN - 1BR-4 (4)
1/4" = 1'-0"



TYPICAL UNIT PLAN - 1BR-2 (2)
1/4" = 1'-0"

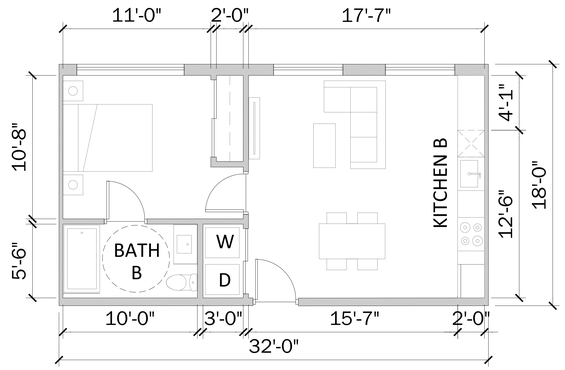


UPPER LEVEL

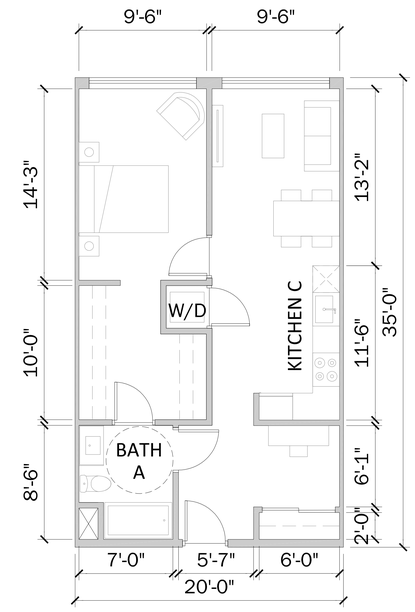


LOWER LEVEL

TYPICAL UNIT PLAN - 1BR-5 (5)
1/4" = 1'-0"



TYPICAL UNIT PLAN - 1BR-3 (3)
1/4" = 1'-0"



TYPICAL UNIT PLAN - 1BR-1 (1)
1/4" = 1'-0"

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DRAWING TITLE: PLAN - TYPICAL UNITS - 1BR

SCALE: 1/4"=1'-0" WHEN PRINTED ON 30"x42" SHEETS

DRAWING NO.: A1.45

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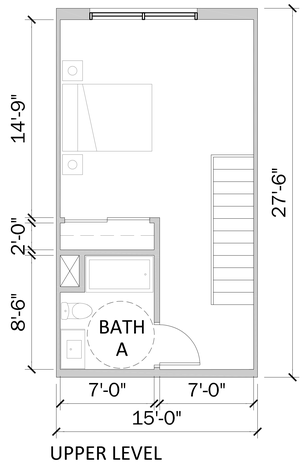
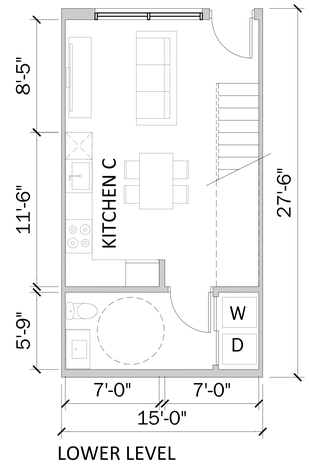
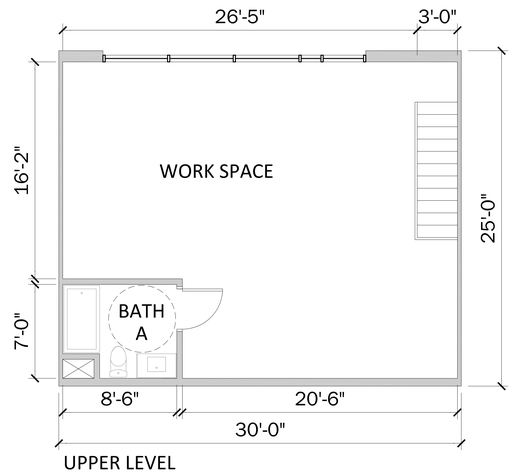


UPPER LEVEL

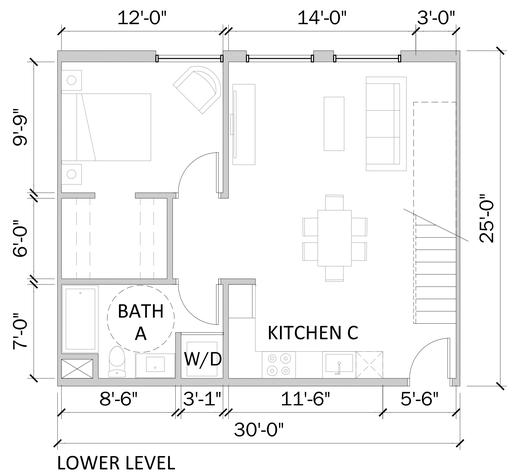


LOWER LEVEL

TYPICAL UNIT PLAN - LW-2
1/4" = 1'-0"
2



UPPER LEVEL



LOWER LEVEL

TYPICAL UNIT PLAN - LW-1
1/4" = 1'-0"
1

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DRAWING TITLE
PLAN - TYPICAL UNITS - LW

SCALE AS NOTE
1/4"=1'-0"
WHEN PRINTED ON 30"x42" SHEETS

DRAWING NO.
A1.50

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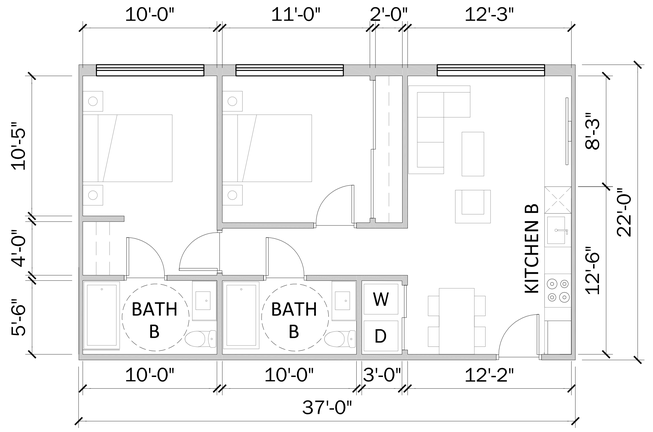
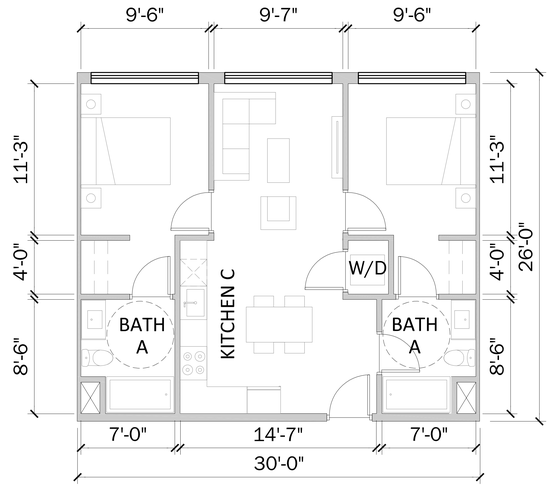
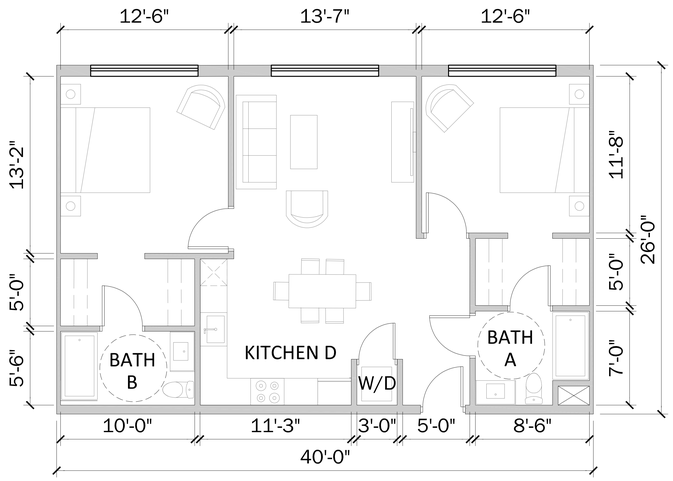


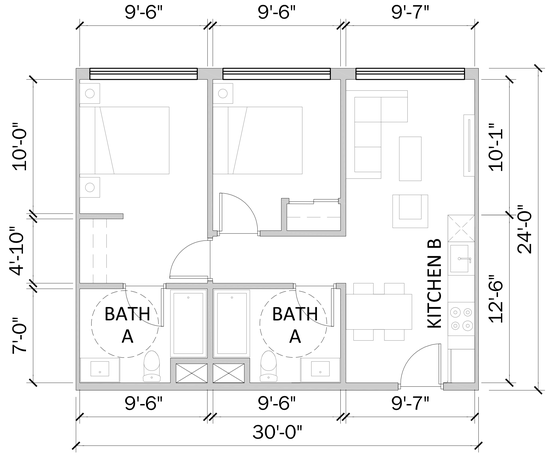
TYPICAL UNIT PLAN - 2BR-4 (4)
1/4" = 1'-0"



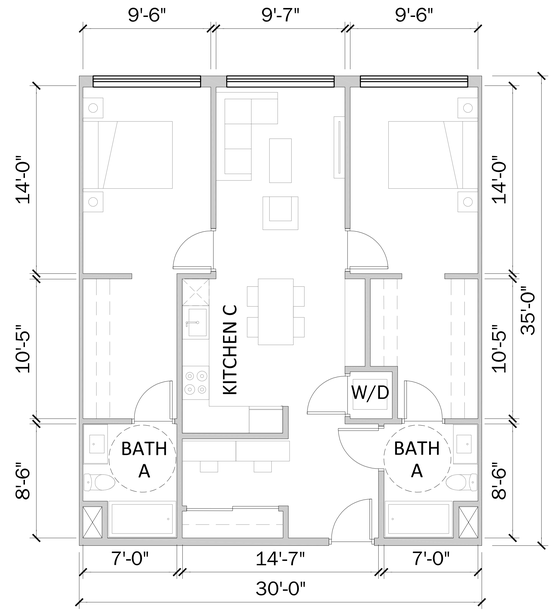
TYPICAL UNIT PLAN - 2BR-2 (2)
1/4" = 1'-0"



TYPICAL UNIT PLAN - 2BR-5 (5)
1/4" = 1'-0"



TYPICAL UNIT PLAN - 2BR-3 (3)
1/4" = 1'-0"



TYPICAL UNIT PLAN - 2BR-1 (1)
1/4" = 1'-0"

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	ENTITLEMENT	07/01/2024

DRAWING TITLE
PLAN - TYPICAL UNITS - 2BR

SCALE AS NOTE
1/4"=1'-0"
WHEN PRINTED ON 30"x42" SHEETS

DRAWING NO.
A1.55

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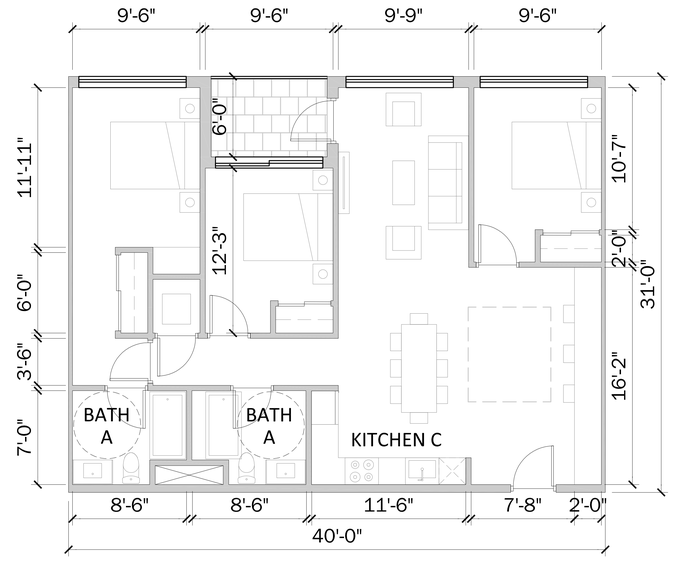
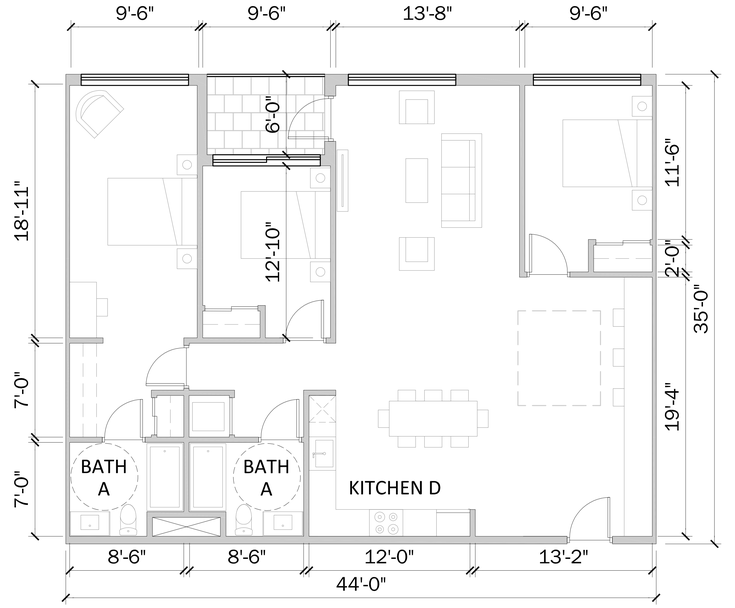


TYPICAL UNIT PLAN - 3BR-2 (2)
1/4" = 1'-0"



TYPICAL UNIT PLAN - 3BR-1 (1)
1/4" = 1'-0"

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DRAWING TITLE: PLAN - TYPICAL UNITS - 3BR

SCALE: 1/4"=1'-0" WHEN PRINTED ON 30"x42" SHEETS

DRAWING NO.: A1.60

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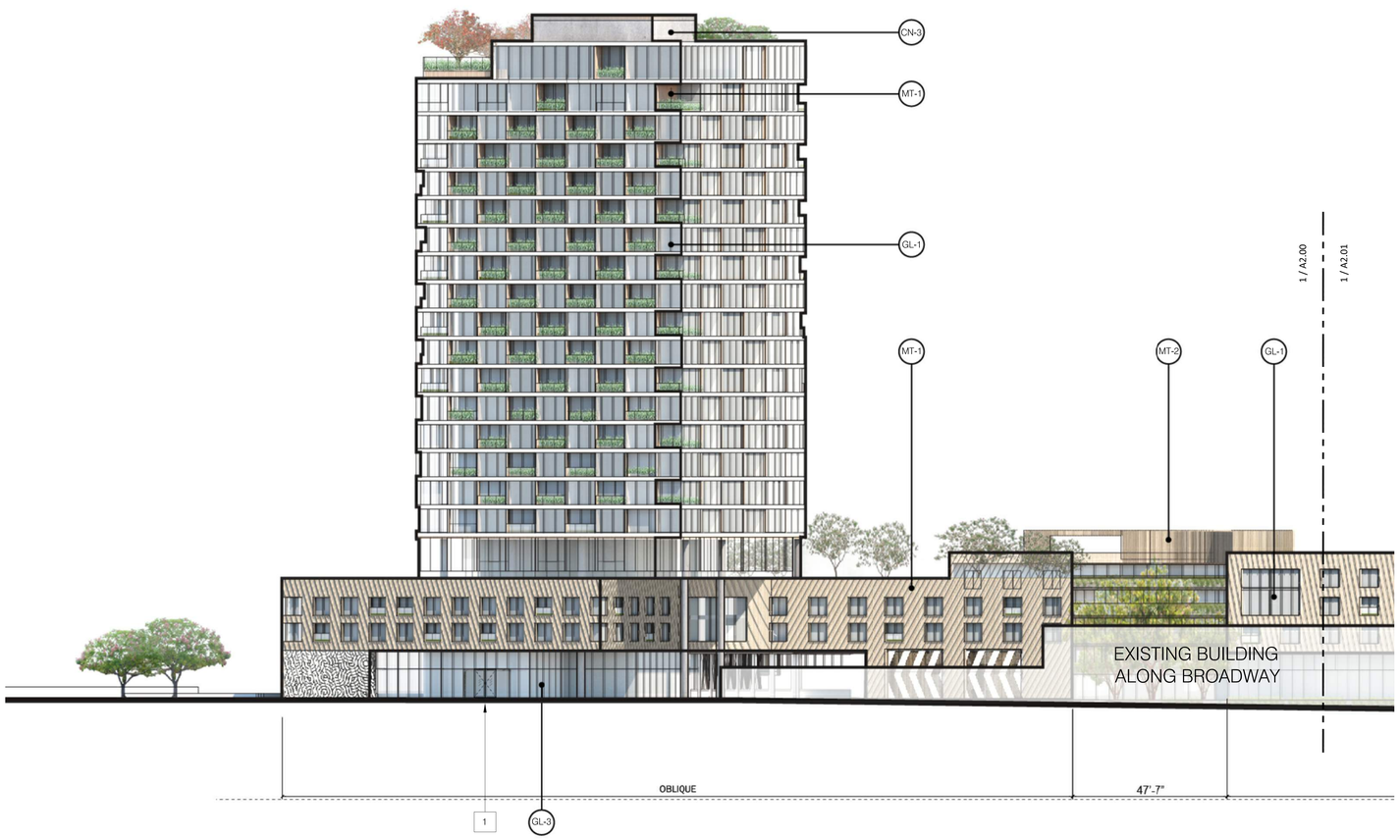
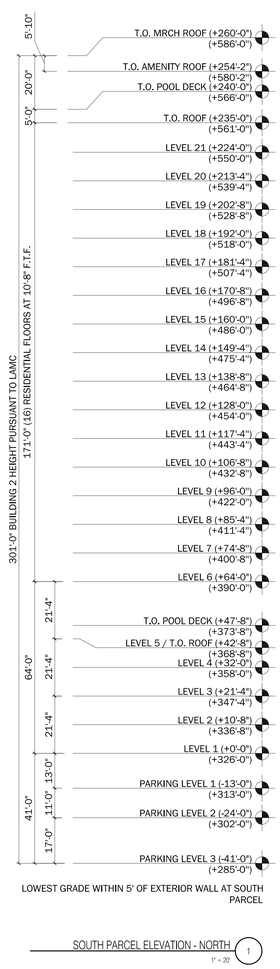
BUILDING 2
BUILDING HEIGHT: 301'
NUMBER OF STORIES: 22 STORIES (+3 PARKING LEVELS)



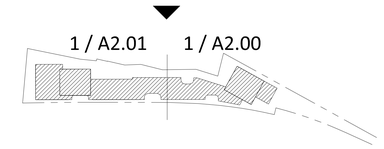


SOUTH PARCEL ELEVATION - NORTH 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



MATERIAL LEGEND

CB-1	FIBER CEMENT BOARD	MT-1	METAL PANEL 1
CN-1	COLORED CONCRETE	MT-2	METAL PANEL 2
CN-2	CONCRETE PLANTER / SEATING	WD-1	WOOD DECKING
CN-3	CONCRETE	WD-2	WOOD TRELLIS
GL-1	WINDOW WALL		
GL-2	GLASS / STEEL GUARDRAIL		
GL-3	STOREFRONT GLAZING		
GW-1	GREEN WALL		

KEYNOTES

1 MAIN BLDG ENTRY

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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ENTITLEMENT 07/01/2024

DRAWING TITLE
ELEVATIONS - SOUTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 30"x42" SHEET

DRAWING NO. A2.00

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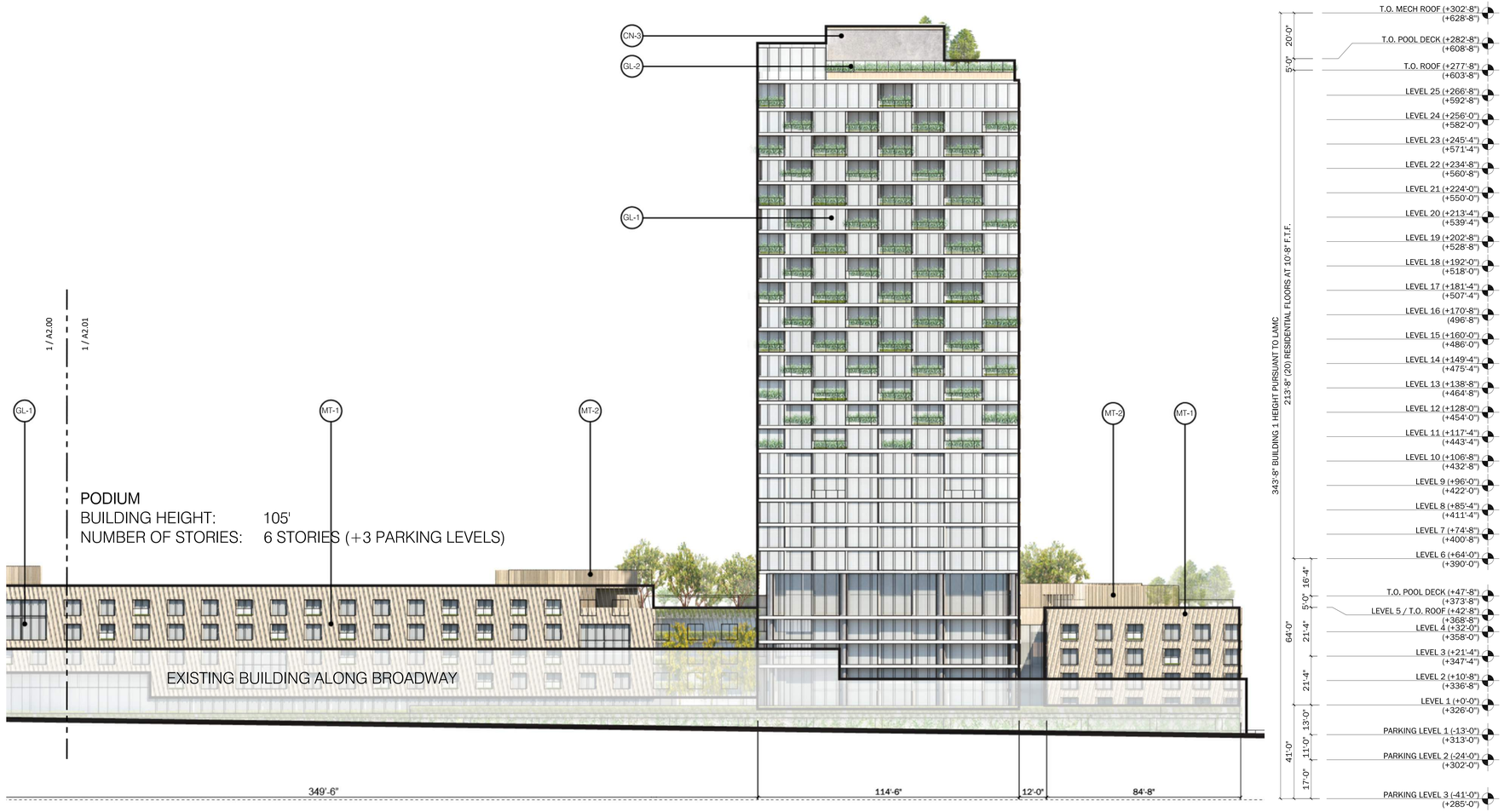
BUILDING 1
BUILDING HEIGHT: 343'-8"
NUMBER OF STORIES: 26 STORIES (+3 PARKING LEVELS)



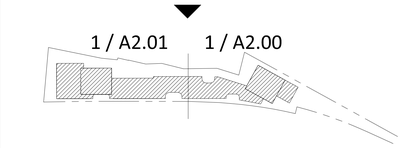
LOWEST GRADE WITHIN 5' OF EXTERIOR WALL AT SOUTH PARCEL

SOUTH PARCEL ELEVATION - NORTH 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



MATERIAL LEGEND

- CB-1 FIBER CEMENT BOARD
- CN-1 COLORED CONCRETE
- CN-2 CONCRETE PLANTER / SEATING
- CN-3 CONCRETE
- GL-1 WINDOW WALL
- GL-2 GLASS / STEEL GUARDRAIL
- GL-3 STOREFRONT GLAZING
- GW-1 GREEN WALL
- MT-1 METAL PANEL 1
- MT-2 METAL PANEL 2
- WD-1 WOOD DECKING
- WD-2 WOOD TRELLIS

KEYNOTES

1 MAIN BLDG ENTRY

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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ELEVATIONS - SOUTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 30"X42" SHEET

A2.01

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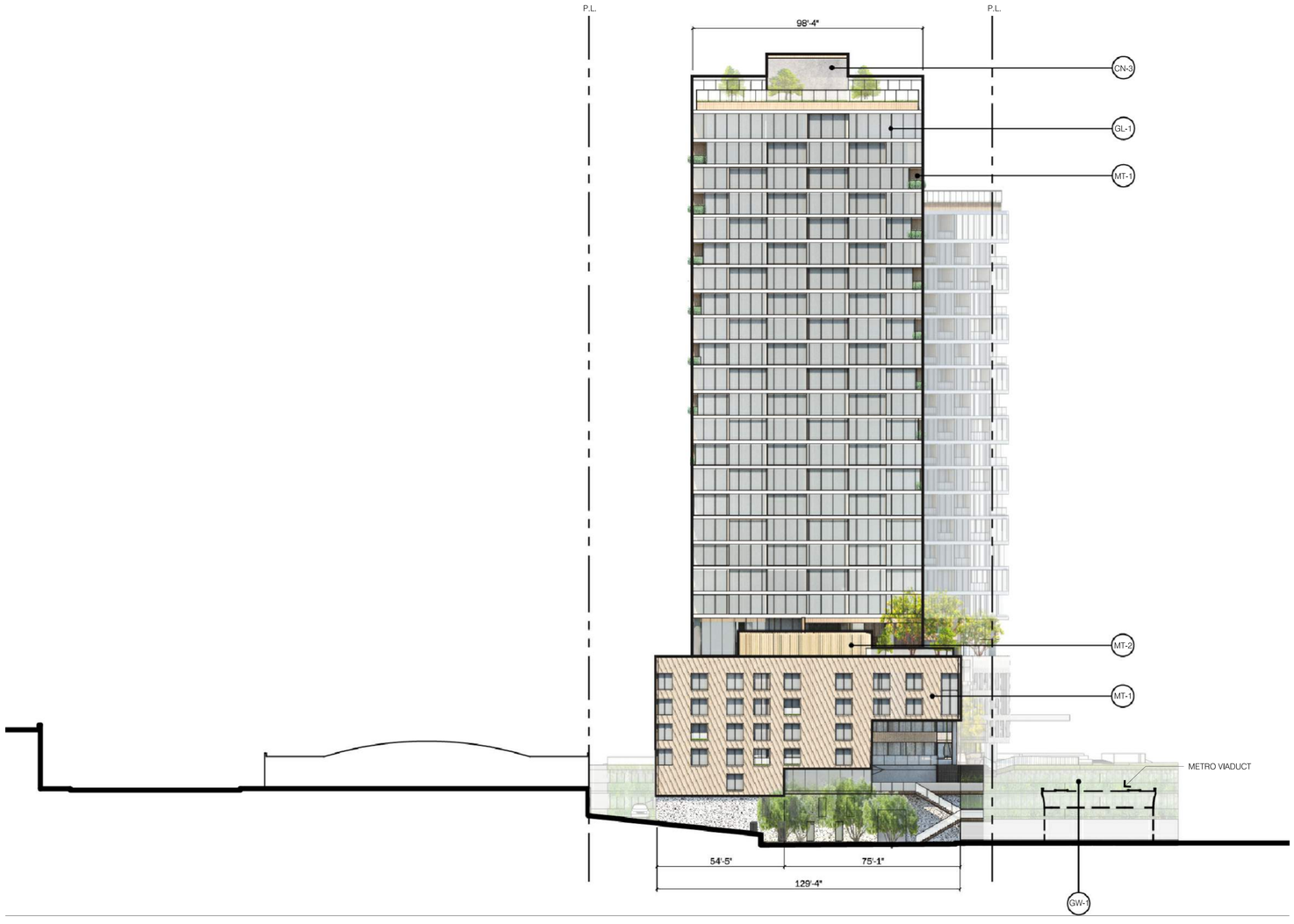
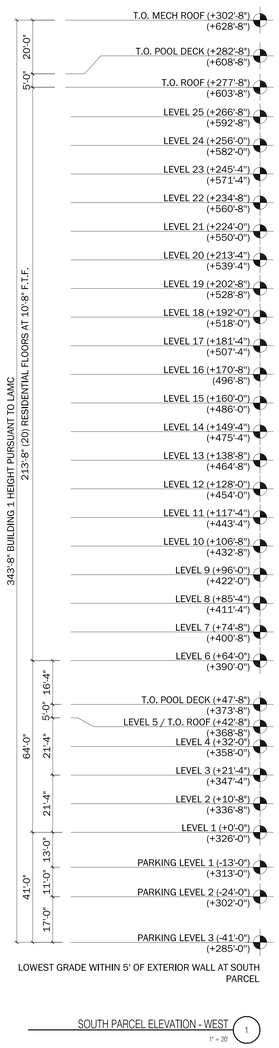
BUILDING 1
BUILDING HEIGHT: 343'-8"
NUMBER OF STORIES: 26 STORIES (+3 PARKING LEVELS)





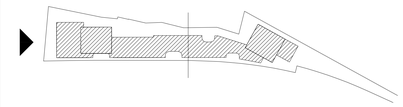
LOWEST GRADE WITHIN 5' OF EXTERIOR WALL AT SOUTH PARCEL

SOUTH PARCEL ELEVATION - WEST 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



MATERIAL LEGEND

- CB-1 FIBER CEMENT BOARD
- CN-1 COLORED CONCRETE
- CN-2 CONCRETE PLANTER / SEATING
- CN-3 CONCRETE
- GL-1 WINDOW WALL
- GL-2 GLASS / STEEL GUARDRAIL
- GL-3 STOREFRONT GLAZING
- GW-1 GREEN WALL
- MT-1 METAL PANEL 1
- MT-2 METAL PANEL 2
- WD-1 WOOD DECKING
- WD-2 WOOD TRELLIS

KEYNOTES

1 MAIN BLDG ENTRY

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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DRAWING TITLE: ELEVATIONS - SOUTH PARCEL

SCALE: 1" = 20' WHEN PRINTED ON 30"x42" SHEET

DRAWING NO. A2.02

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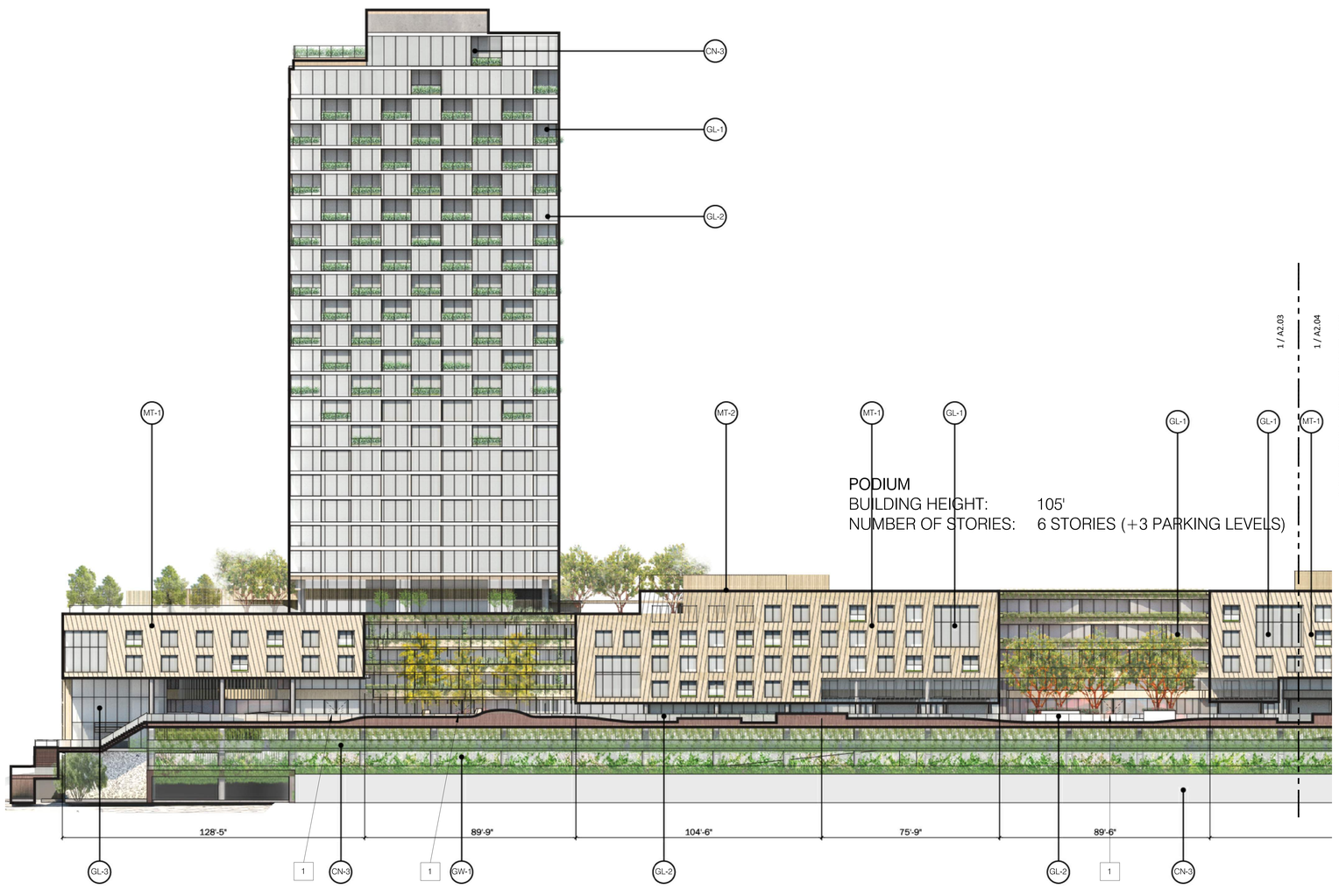
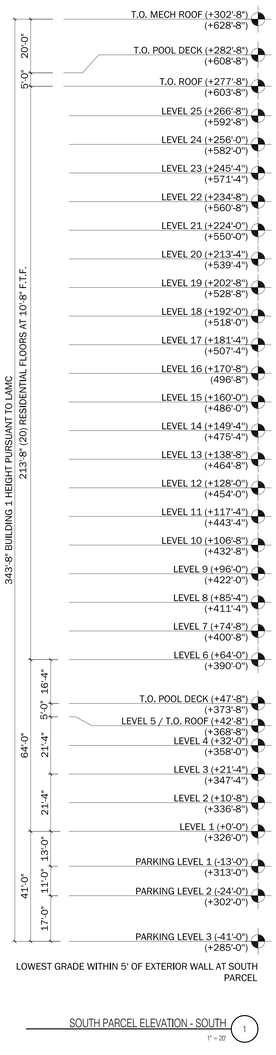
BUILDING 1
BUILDING HEIGHT: 343'-8"
NUMBER OF STORIES: 26 STORIES (+3 PARKING LEVELS)





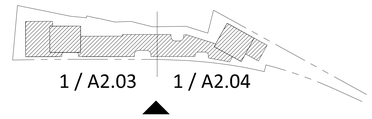
LOWEST GRADE WITHIN 5' OF EXTERIOR WALL AT SOUTH PARCEL

SOUTH PARCEL ELEVATION - SOUTH 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



MATERIAL LEGEND

CB-1	FIBER CEMENT BOARD	MT-1	METAL PANEL 1
CN-1	COLORED CONCRETE	MT-2	METAL PANEL 2
CN-2	CONCRETE PLANTER / SEATING	WD-1	WOOD DECKING
CN-3	CONCRETE	WD-2	WOOD TRELLIS
GL-1	WINDOW WALL		
GL-2	GLASS / STEEL GUARDRAIL		
GL-3	STOREFRONT GLAZING		
GW-1	GREEN WALL		

KEYNOTES

1 MAIN BLDG ENTRY

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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ELEVATIONS - SOUTH PARCEL

SCALE 1" = 20'

DRAWING NO. A2.03

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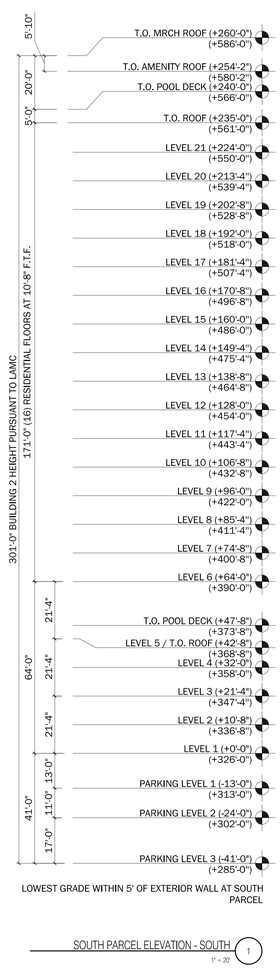
BUILDING 2
BUILDING HEIGHT: 301'
NUMBER OF STORIES: 22 STORIES (+3 PARKING LEVELS)



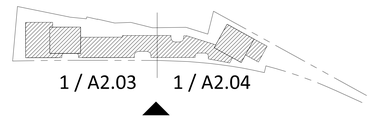


SOUTH PARCEL ELEVATION - SOUTH 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



MATERIAL LEGEND

CB-1	FIBER CEMENT BOARD	MT-1	METAL PANEL 1
CN-1	COLORED CONCRETE	MT-2	METAL PANEL 2
CN-2	CONCRETE PLANTER / SEATING	WD-1	WOOD DECKING
CN-3	CONCRETE	WD-2	WOOD TRELLIS
GL-1	WINDOW WALL		
GL-2	GLASS / STEEL GUARDRAIL		
GL-3	STOREFRONT GLAZING		
GW-1	GREEN WALL		

KEYNOTES

1 MAIN BLDG ENTRY

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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ISSUES
ENTITLEMENT 07/01/2024

DRAWING TITLE
ELEVATIONS - SOUTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 30"x42" SHEET

DRAWING NO. A2.04

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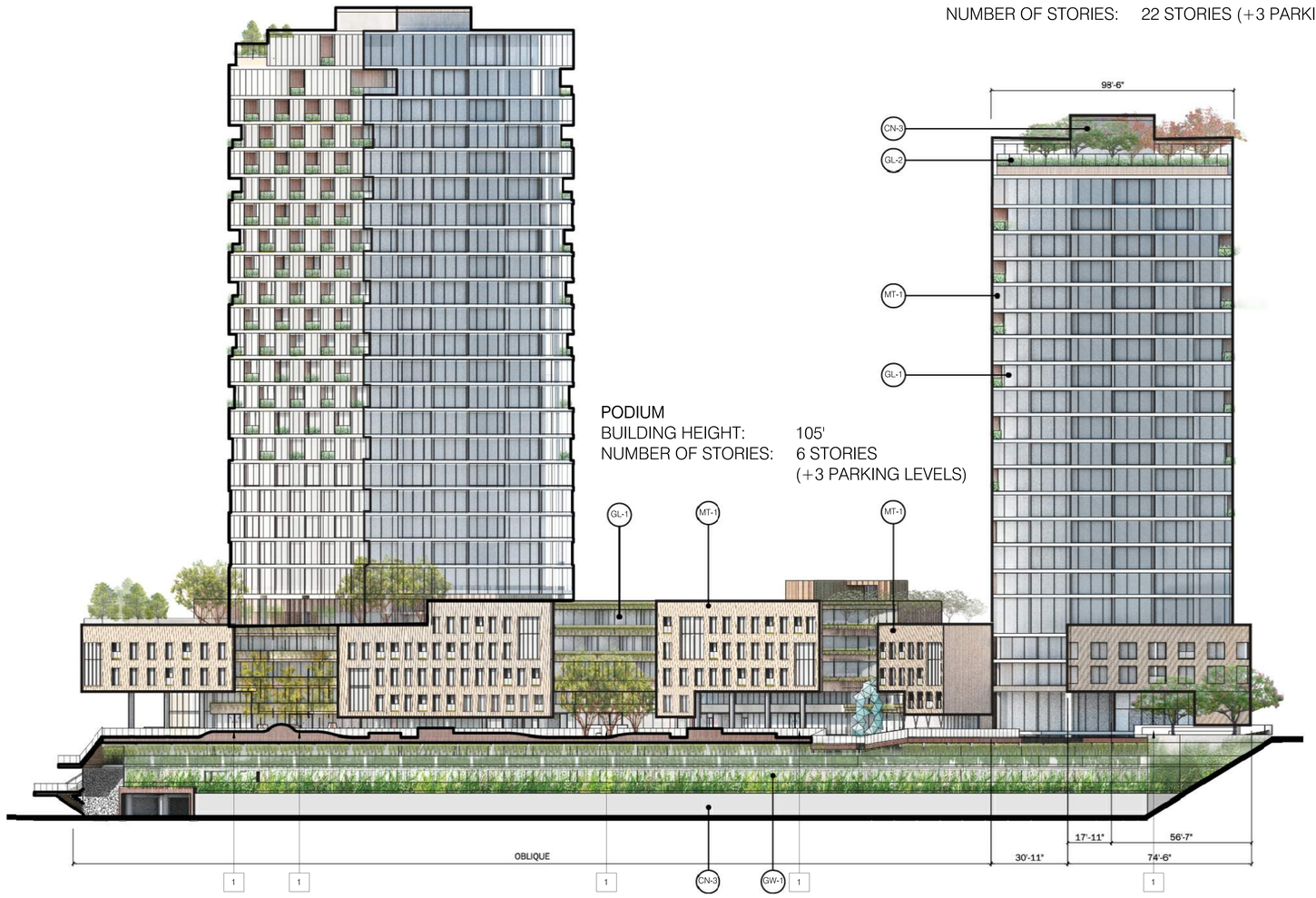
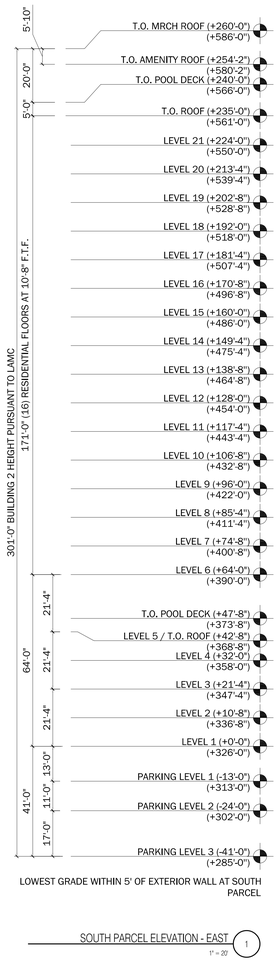
BUILDING 1
BUILDING HEIGHT: 343'-8"
NUMBER OF STORIES: 26 STORIES (+3 PARKING LEVELS)

BUILDING 2
BUILDING HEIGHT: 301'
NUMBER OF STORIES: 22 STORIES (+3 PARKING LEVELS)



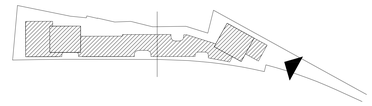


SOUTH PARCEL ELEVATION - EAST (1)
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



MATERIAL LEGEND

CB-1	FIBER CEMENT BOARD	MT-1	METAL PANEL 1
CN-1	COLORED CONCRETE	MT-2	METAL PANEL 2
CN-2	CONCRETE PLANTER / SEATING	WD-1	WOOD DECKING
CN-3	CONCRETE	WD-2	WOOD TRELLIS
GL-1	WINDOW WALL		
GL-2	GLASS / STEEL GUARDRAIL		
GL-3	STOREFRONT GLAZING		
GW-1	GREEN WALL		

KEYNOTES

1 MAIN BLDG ENTRY

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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ISSUED		
	ENTITLEMENT	07/01/2024

REVISIONS

DRAWING TITLE: ELEVATIONS - SOUTH PARCEL

SCALE: 1" = 20'

DRAWING NO. A2.05

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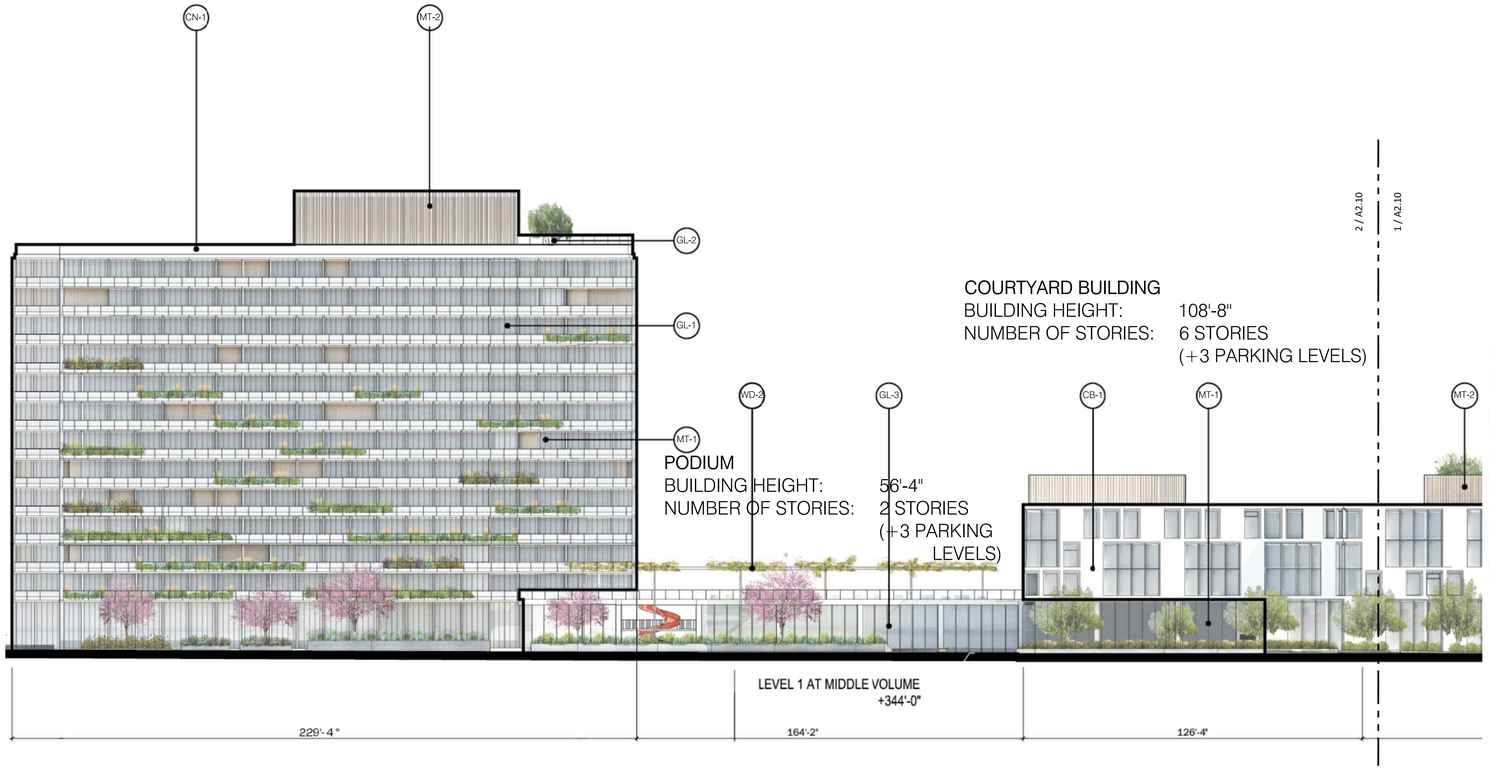
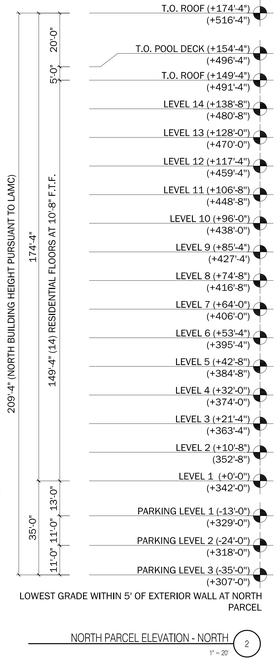
NORTH BUILDING
BUILDING HEIGHT: 209'-4"
NUMBER OF STORIES: 15 STORIES (+3 PARKING LEVELS)



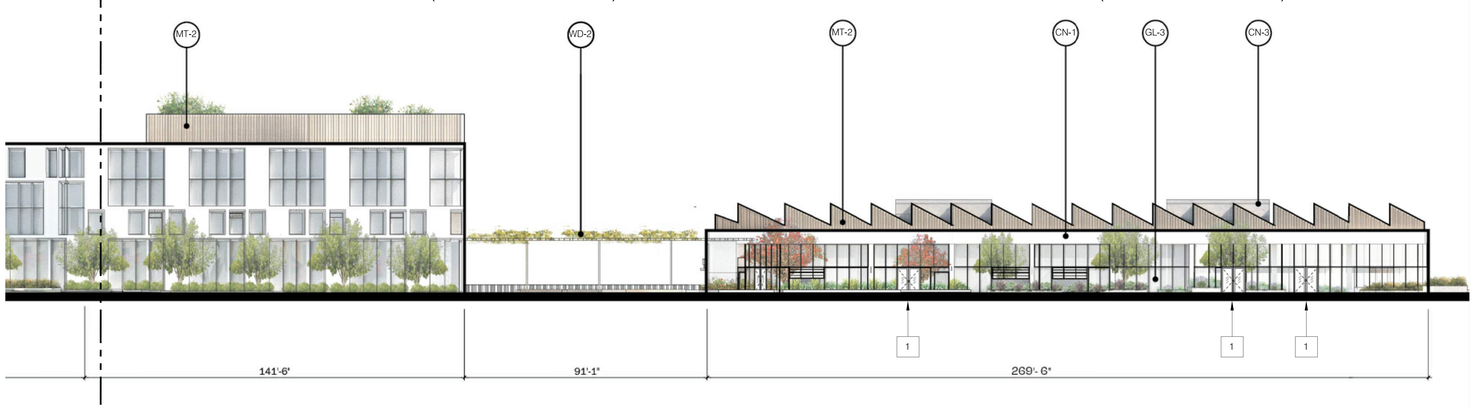


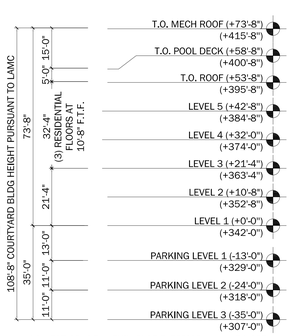
LOWEST GRADE WITHIN 5' OF EXTERIOR WALL AT NORTH PARCEL

NORTH PARCEL ELEVATION - NORTH 2
1" = 20'

COURTYARD BUILDING
BUILDING HEIGHT: 108'-8"
NUMBER OF STORIES: 6 STORIES (+3 PARKING LEVELS)

RETAIL BLOCK
BUILDING HEIGHT: 72'-4"
NUMBER OF STORIES: 3 STORIES (+3 PARKING LEVELS)





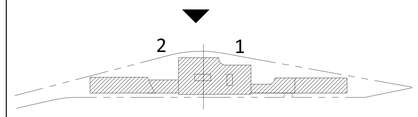
LOWEST GRADE WITHIN 5' OF EXTERIOR WALL AT NORTH PARCEL

NORTH PARCEL ELEVATION - NORTH 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



MATERIAL LEGEND

CB-1	FIBER CEMENT BOARD	MT-1	METAL PANEL 1
CN-1	COLORED CONCRETE	MT-2	METAL PANEL 2
CN-2	CONCRETE PLANTER / SEATING	WD-1	WOOD DECKING
CN-3	CONCRETE	WD-2	WOOD TRELLIS
GL-1	WINDOW WALL		
GL-2	GLASS / STEEL GUARDRAIL		
GL-3	STOREFRONT GLAZING		
GW-1	GREEN WALL		

KEYNOTES

1 MAIN BLDG ENTRY

GENERAL NOTES

1. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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DRAWING TITLE: ELEVATIONS - NORTH PARCEL

SCALE: 1" = 20' WHEN PRINTED ON 24"x36" SHEET

DRAWING NO. A2.10

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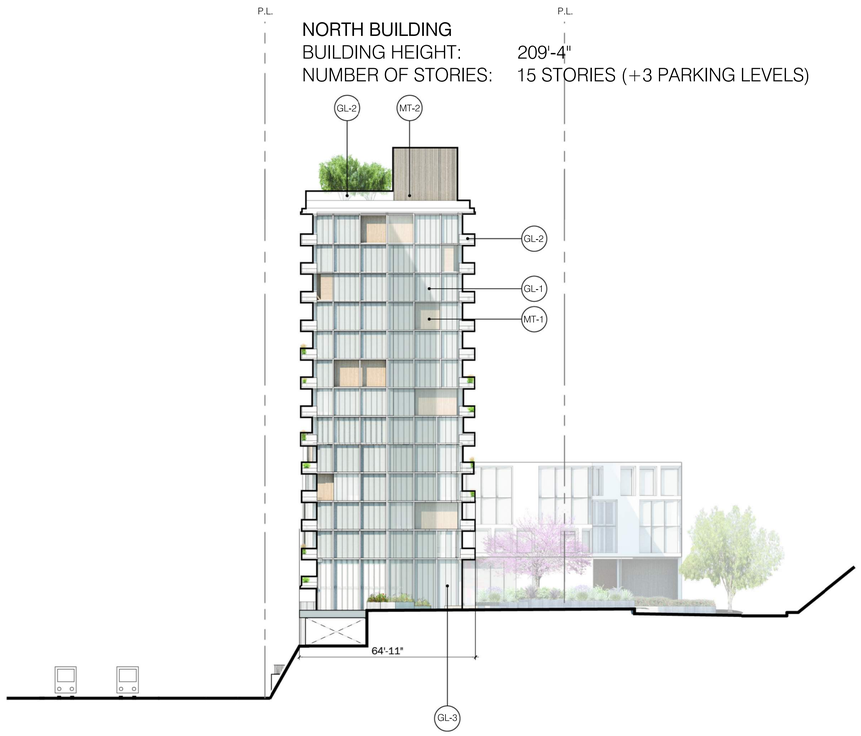
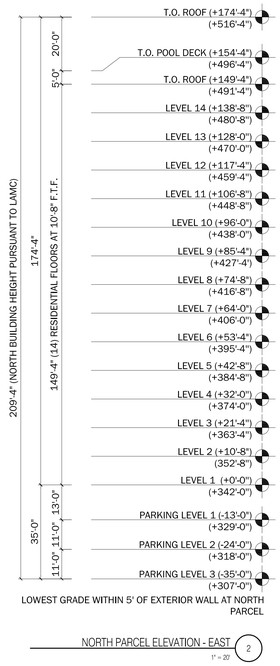




LOWEST GRADE WITHIN 5' OF EXTERIOR WALL AT NORTH PARCEL

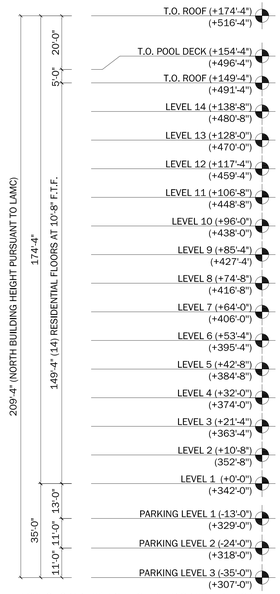
NORTH PARCEL ELEVATION - EAST 2
1" = 20'

NORTH BUILDING
BUILDING HEIGHT: 209'-4"
NUMBER OF STORIES: 15 STORIES (+3 PARKING LEVELS)

COURTYARD BUILDING
BUILDING HEIGHT: 108'-8"
NUMBER OF STORIES: 6 STORIES
(+3 PARKING LEVELS)

RETAIL BLOCK
BUILDING HEIGHT: 72'-4"
NUMBER OF STORIES: 3 STORIES
(+3 PARKING LEVELS)





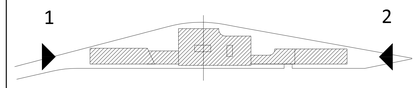
LOWEST GRADE WITHIN 5' OF EXTERIOR WALL AT NORTH PARCEL

NORTH PARCEL ELEVATION - WEST 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



MATERIAL LEGEND

CB-1	FIBER CEMENT BOARD	MT-1	METAL PANEL 1
CN-1	COLORED CONCRETE	MT-2	METAL PANEL 2
CN-2	CONCRETE PLANTER / SEATING	WD-1	WOOD DECKING
CN-3	CONCRETE	WD-2	WOOD TRELLIS
GL-1	WINDOW WALL		
GL-2	GLASS / STEEL GUARDRAIL		
GL-3	STOREFRONT GLAZING		
GW-1	GREEN WALL		

KEYNOTES

1 MAIN BLDG ENTRY

GENERAL NOTES

1. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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PROJECT ID 18046

CONSULTANT

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REVISIONS

ISSUES
ENTITLEMENT 07/01/2024

DRAWING TITLE
ELEVATIONS - NORTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 24"X36" SHEET

DRAWING NO. A2.11

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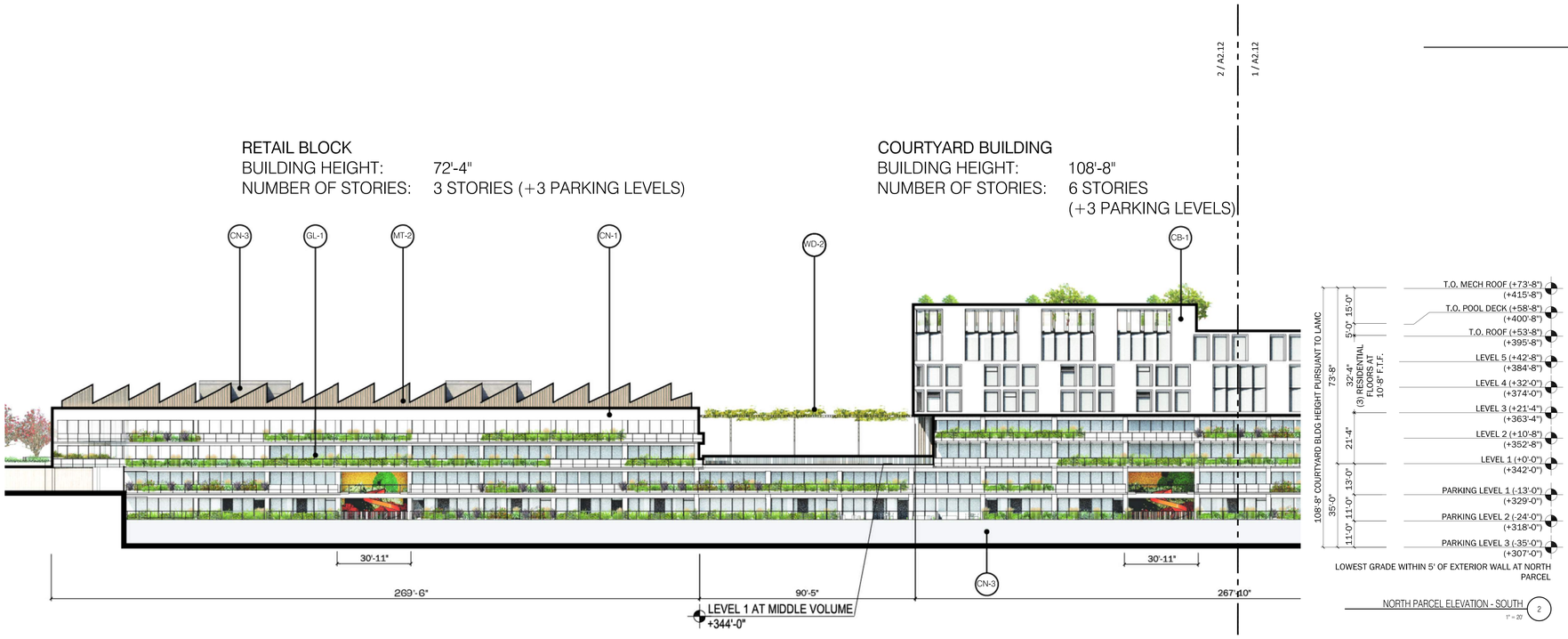
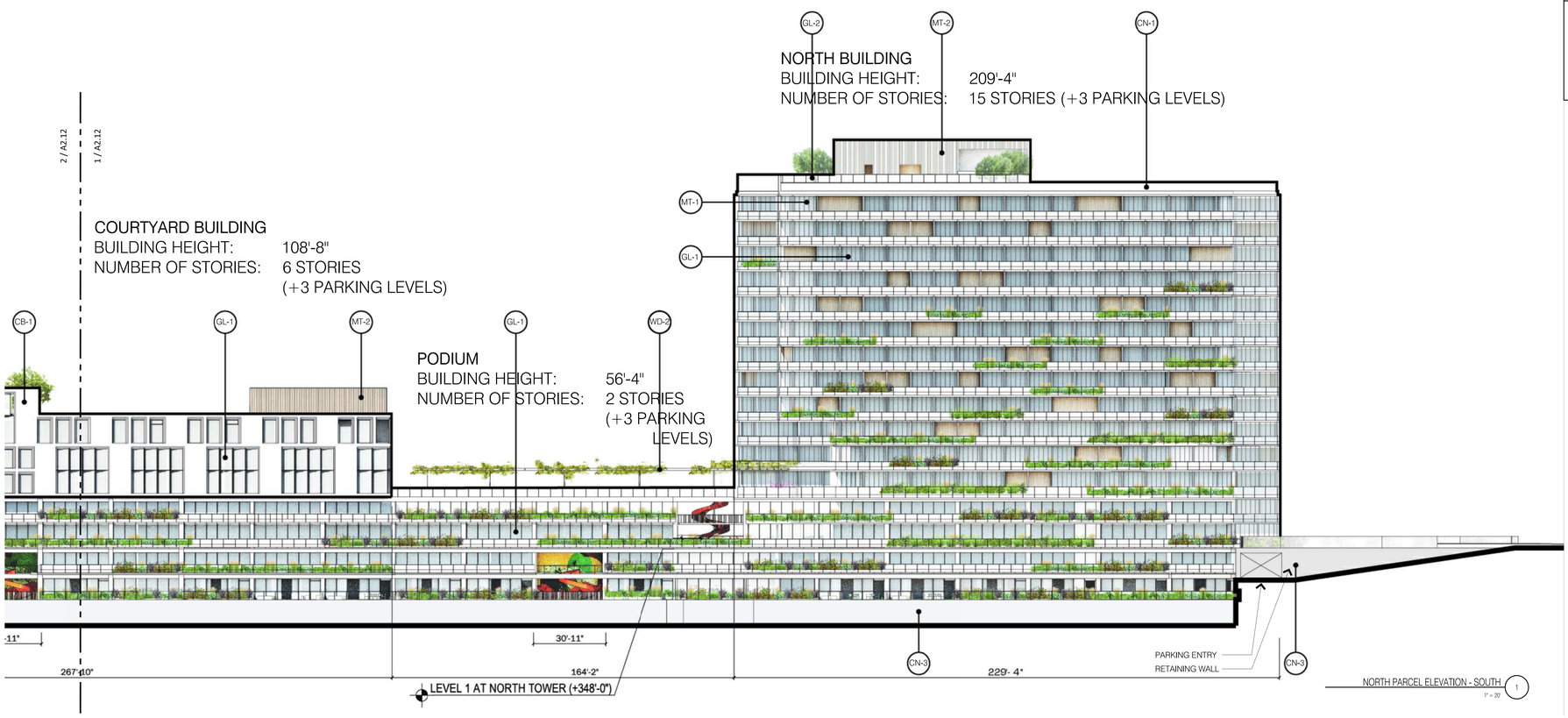
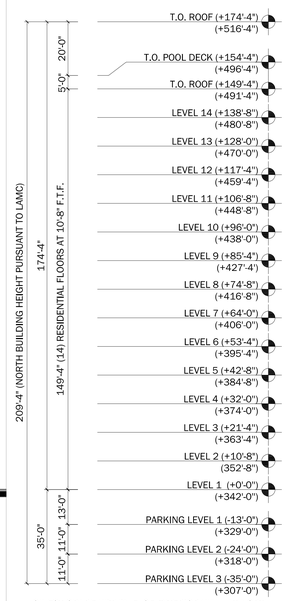






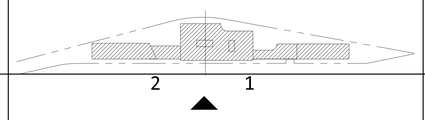
KEYPLAN: SITE

1" = 500'



KEYPLAN: NORTH PARCEL

1" = 200'



MATERIAL LEGEND

- CB-1 FIBER CEMENT BOARD
- CN-1 COLORED CONCRETE
- CN-2 CONCRETE PLANTER / SEATING
- CN-3 CONCRETE
- GL-1 WINDOW WALL
- GL-2 GLASS / STEEL GUARDRAIL
- GL-3 STOREFRONT GLAZING
- GW-1 GREEN WALL
- MT-1 METAL PANEL 1
- MT-2 METAL PANEL 2
- WD-1 WOOD DECKING
- WD-2 WOOD TRELLIS

KEYNOTES

1 MAIN BLDG ENTRY

GENERAL NOTES

1. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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ENTITLEMENT		07/01/2024

DRAWING TITLE: ELEVATIONS - NORTH PARCEL

SCALE: 1" = 20"

DRAWING NO. A2.12

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MT-1 METAL PANEL 1



MT-2 METAL PANEL 2



GL-1 WINDOW WALL



GL-2 GLASS GUARDRAIL



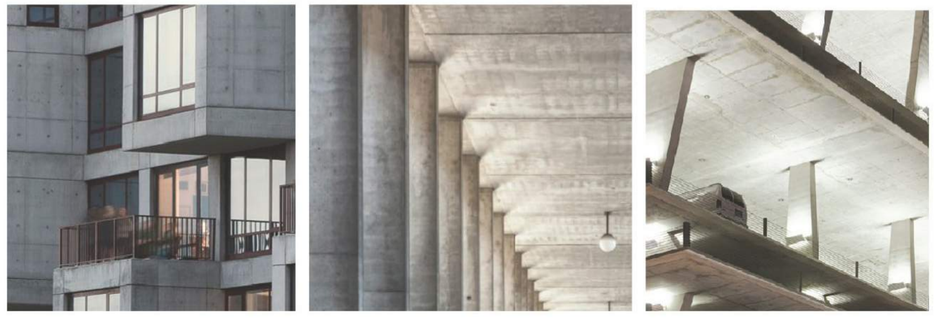
CN-1 COLORED CONCRETE



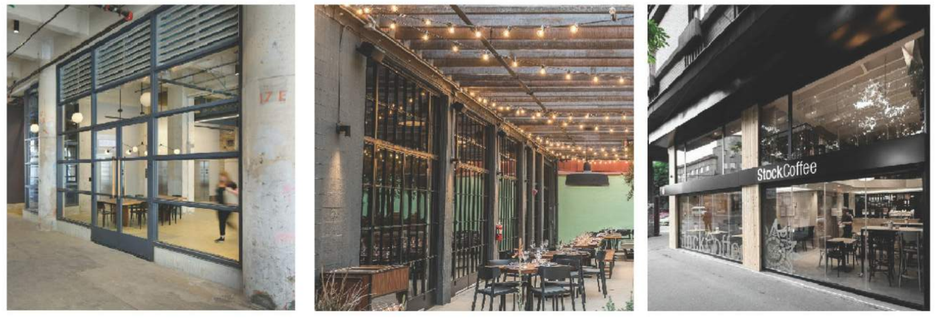
CN-2 CONCRETE PLANTER



CN-3 CAST IN PLACE CONCRETE



GL-3 STOREFRONT GLAZING



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ENTITLEMENT 07/01/2024

DRAWING TITLE
ELEVATIONS - MATERIAL BOARD

DATE

SCALE
N/A
WHEN PRINTED ON 30"x42" SHEETS

DRAWING NO.
A2.20

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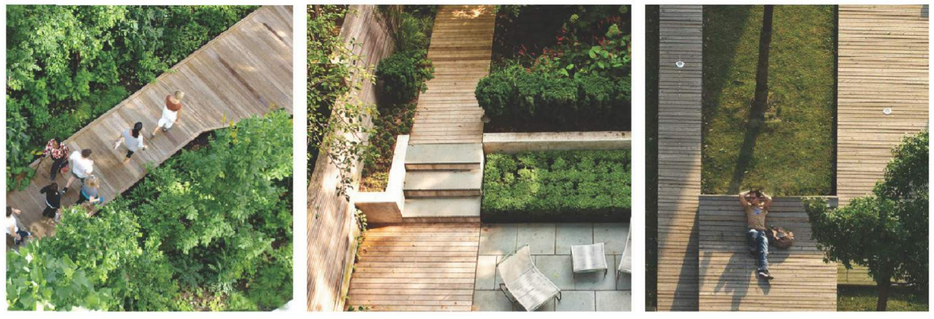
WD-1 WOOD DECKING



WD-2 WOOD TRELLIS



GW-1 GREEN WALL



CB-1 FIBER CEMENT BOARD



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DRAWING TITLE ELEVATIONS - MATERIAL BOARD

SCALE N/A WHEN PRINTED ON 30"x42" SHEETS

DRAWING NO. A2.21

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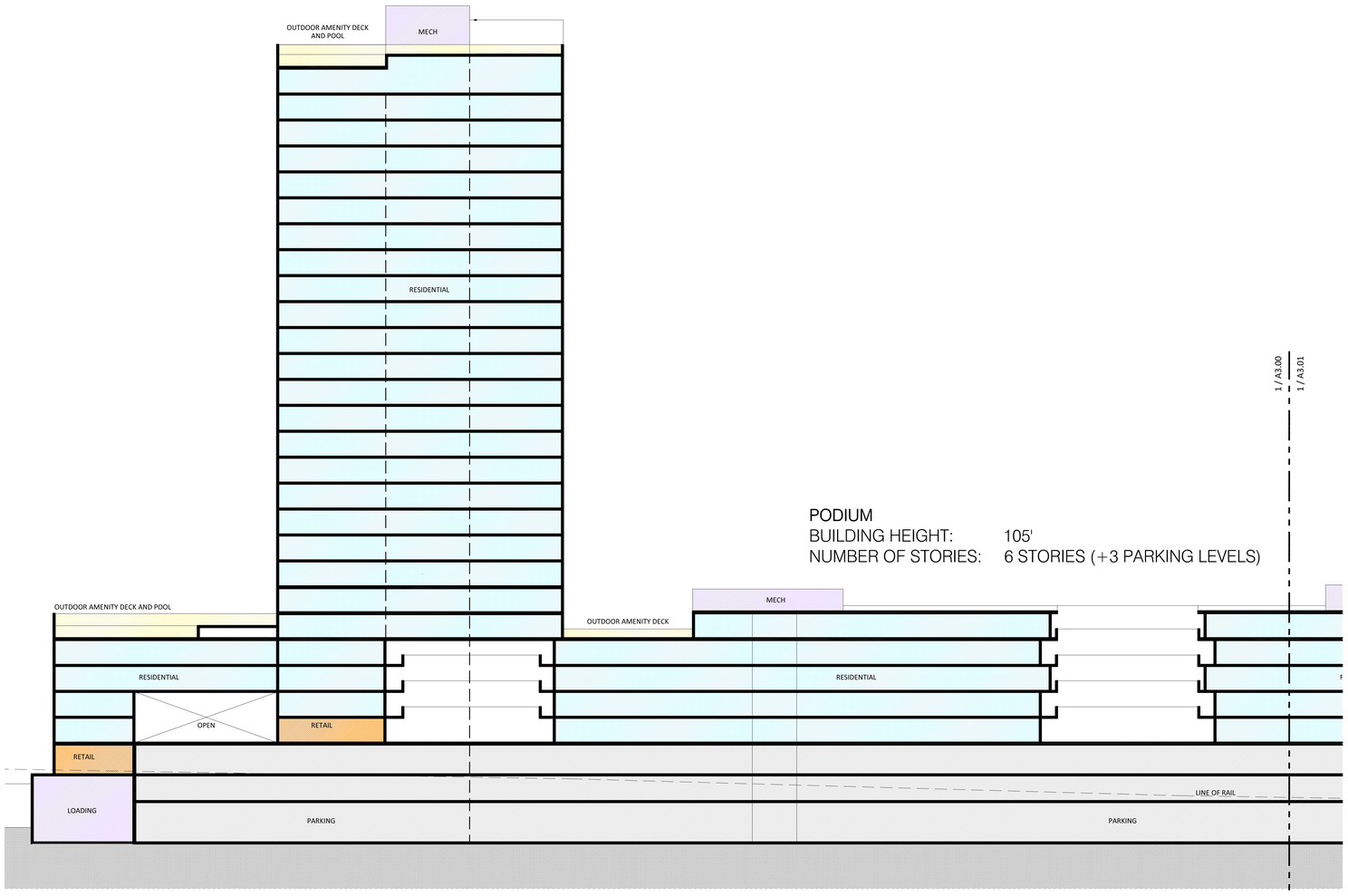
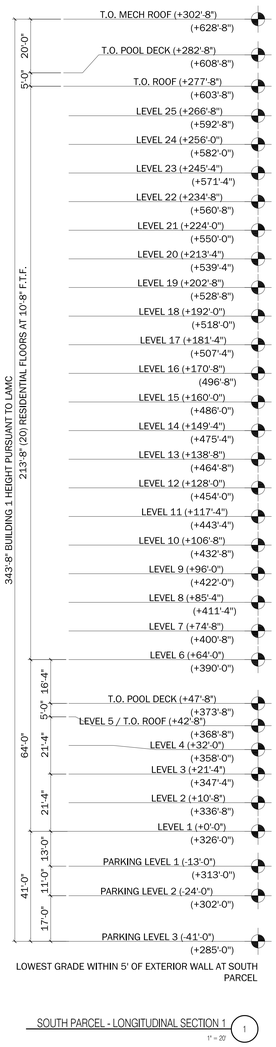
BUILDING 1
BUILDING HEIGHT: 343'-8"
NUMBER OF STORIES: 26 STORIES (+3 PARKING LEVELS)



PODIUM
BUILDING HEIGHT: 105'
NUMBER OF STORIES: 6 STORIES (+3 PARKING LEVELS)



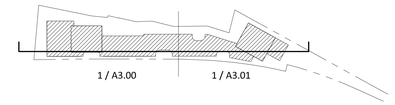
LOWEST GRADE WITHIN 5' OF EXTERIOR WALL AT SOUTH PARCEL

SOUTH PARCEL - LONGITUDINAL SECTION 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



LEGEND

- RESIDENTIAL
- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- EARTH

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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	ENTITLEMENT	07/01/2024

SECTIONS - SOUTH PARCEL

DRAWING TITLE

SCALE 1" = 20'
WHEN PRINTED ON 24"X36" SHEET

DRAWING NO. A3.00

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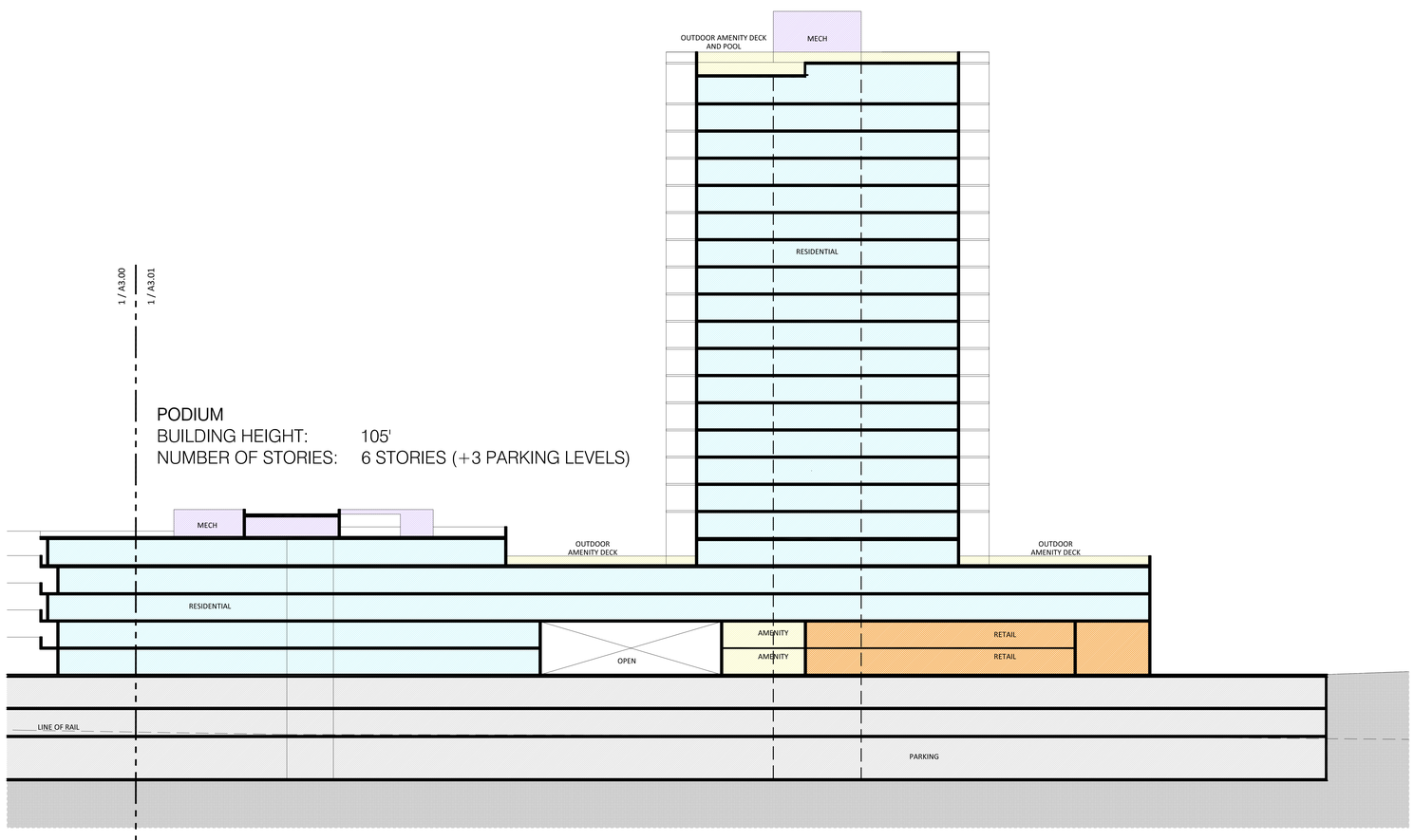
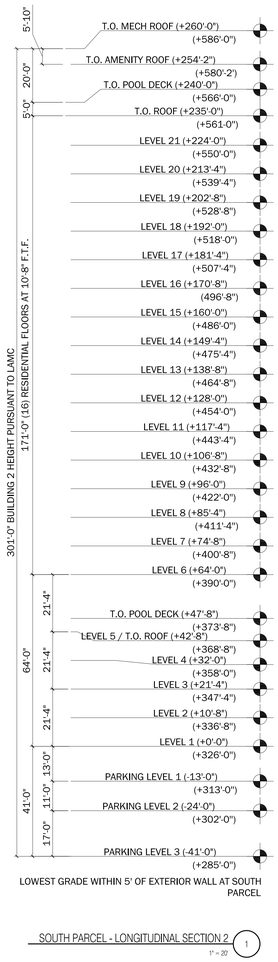
BUILDING 2
BUILDING HEIGHT: 301'
NUMBER OF STORIES: 22 STORIES (+3 PARKING LEVELS)





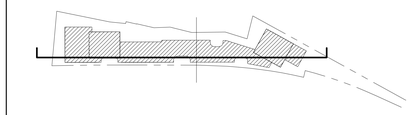
LOWEST GRADE WITHIN 5' OF EXTERIOR WALL AT SOUTH PARCEL

SOUTH PARCEL - LONGITUDINAL SECTION 2
1" = 20'
1

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



LEGEND

- RESIDENTIAL
- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- EARTH

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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DRAWING TITLE: SECTIONS - SOUTH PARCEL

SCALE: 1" = 20' WHEN PRINTED ON 30"X42" SHEET

DRAWING NO. A3.01

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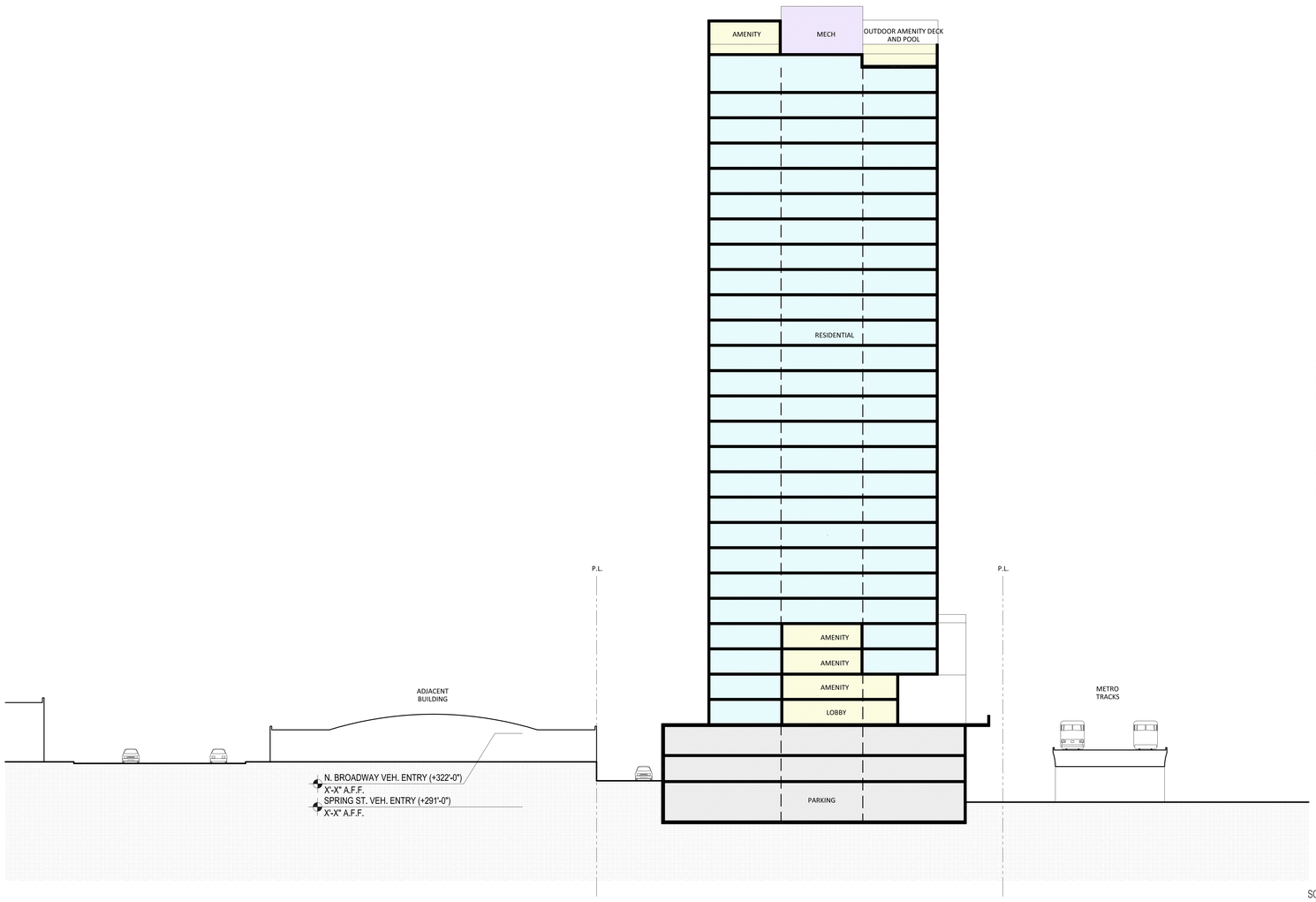
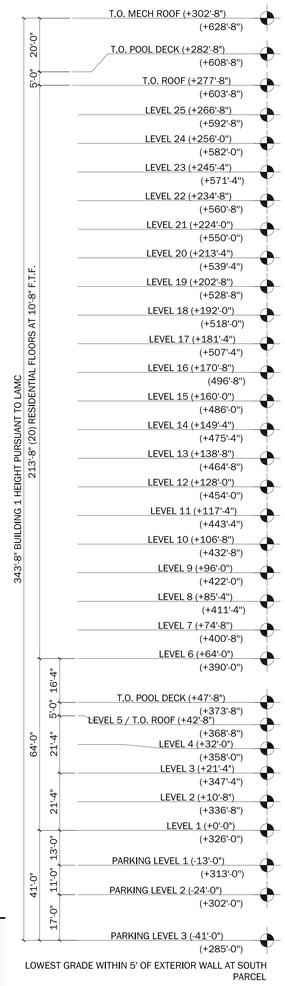
BUILDING 1
BUILDING HEIGHT: 343'-8"
NUMBER OF STORIES: 26 STORIES (+3 PARKING LEVELS)



SOUTH PARCEL - TRANSVERSE SECTION (BUILDING 1)
1" = 20'

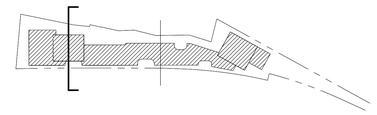


LOWEST GRADE WITHIN 5' OF EXTERIOR WALL AT SOUTH PARCEL

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



LEGEND

- RESIDENTIAL
- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- EARTH

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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	ENTITLEMENT	07/01/2024

SECTIONS - SOUTH PARCEL

SCALE 1" = 20'
WHEN PRINTED ON 30"x42" SHEETS

DRAWING NO. A3.02

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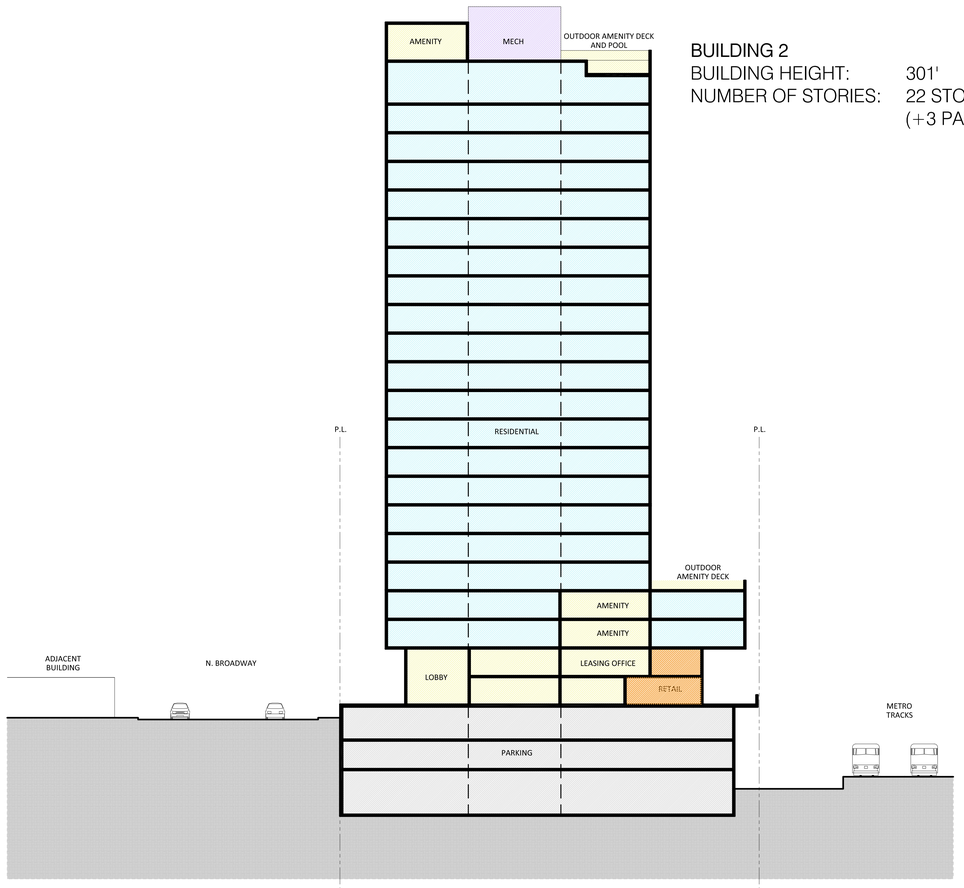
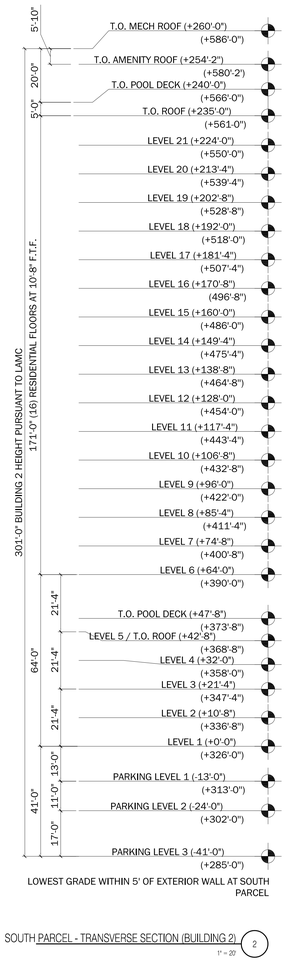
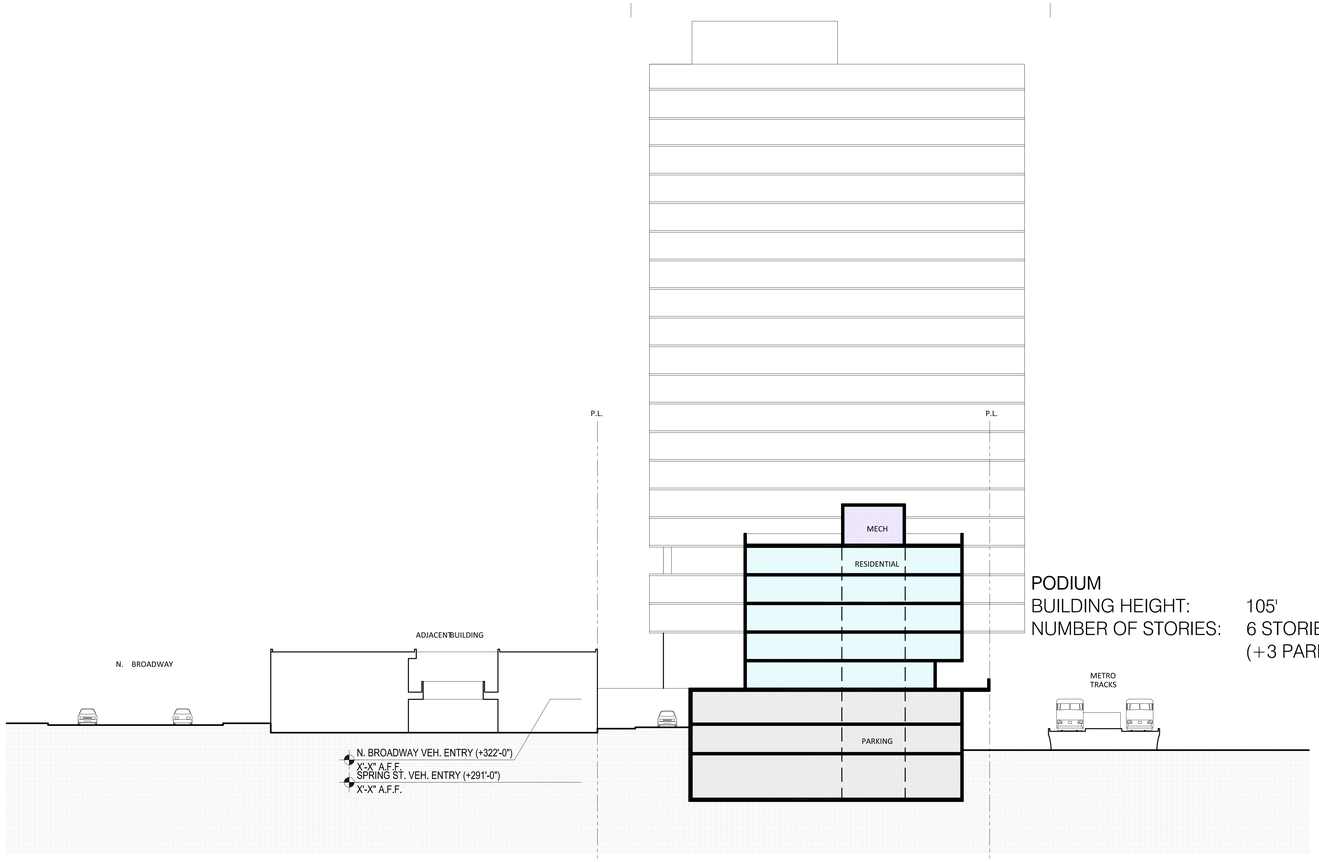


BUILDING 2
BUILDING HEIGHT: 301'
NUMBER OF STORIES: 22 STORIES
(+3 PARKING LEVELS)

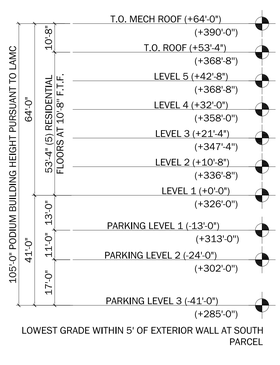


LOWEST GRADE WITHIN 5' OF EXTERIOR WALL AT SOUTH PARCEL

SOUTH PARCEL - TRANSVERSE SECTION (BUILDING 2) 2
1" = 20'



PODIUM
BUILDING HEIGHT: 105'
NUMBER OF STORIES: 6 STORIES
(+3 PARKING LEVELS)



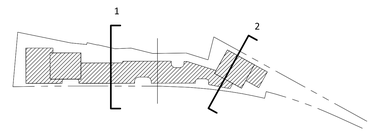
LOWEST GRADE WITHIN 5' OF EXTERIOR WALL AT SOUTH PARCEL

SOUTH PARCEL - TRANSVERSE SECTION (PODIUM) 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



LEGEND

- RESIDENTIAL
- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- EARTH

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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DRAWING TITLE
SECTIONS - SOUTH PARCEL

SCALE 1" = 20' WHEN PRINTED ON 30"x42" SHEET

DRAWING NO. A3.03

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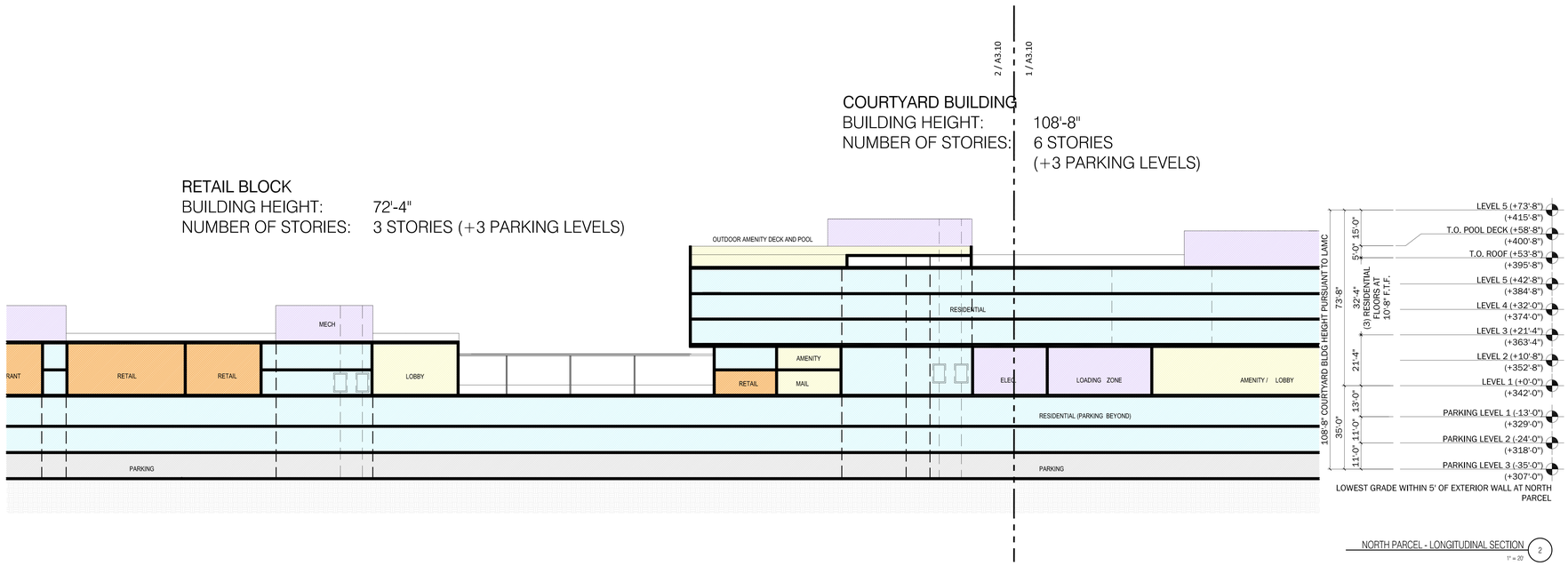
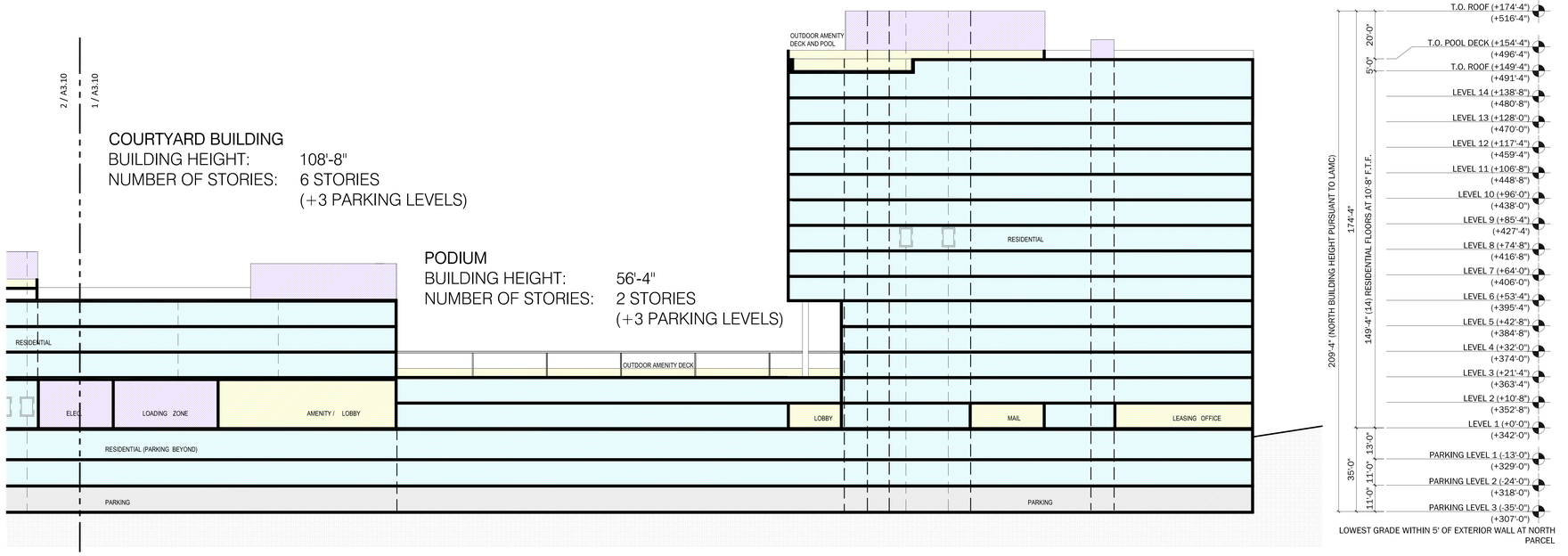


NORTH PARCEL - LONGITUDINAL SECTION 2
1" = 20'

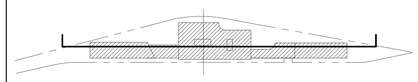


NORTH PARCEL - LONGITUDINAL SECTION 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



LEGEND

- RESIDENTIAL
- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- EARTH

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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SECTIONS - NORTH PARCEL

DRAWING TITLE

SCALE 1" = 20' WHEN PRINTED ON 24"x36" SHEET

DATE

DRAWING NO. A3.10

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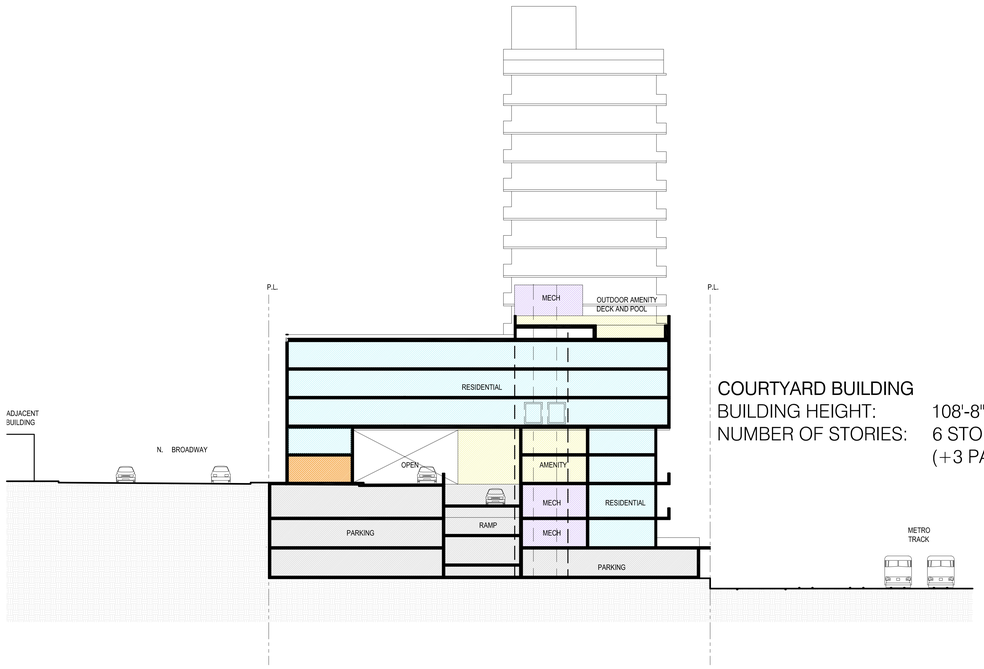
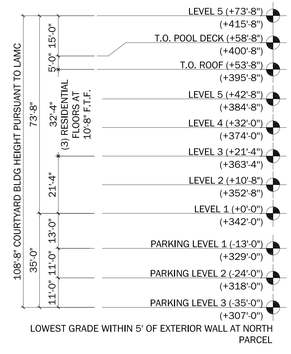
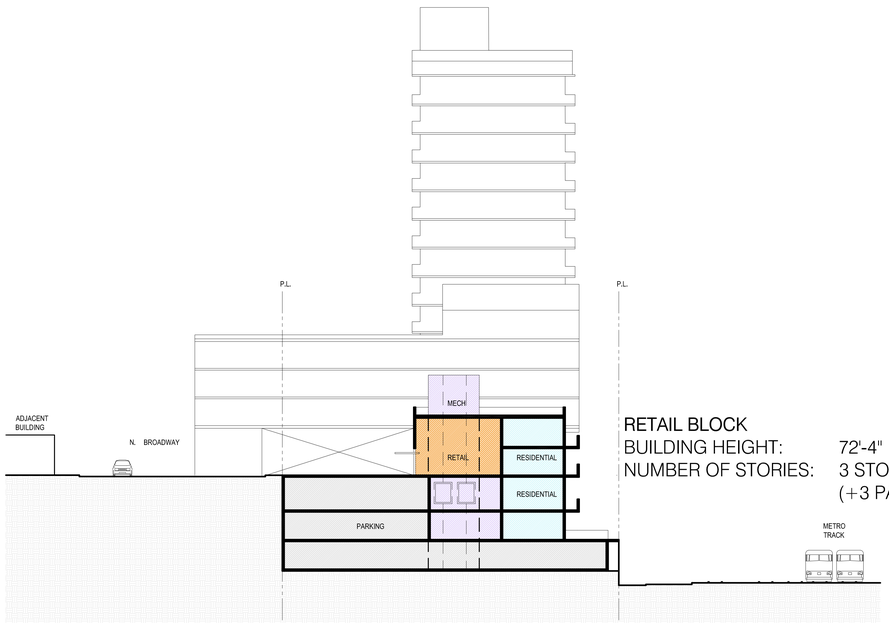


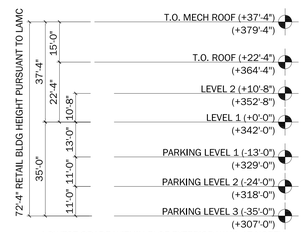
COURTYARD BUILDING
BUILDING HEIGHT: 108'-8"
NUMBER OF STORIES: 6 STORIES
(+3 PARKING LEVELS)



NORTH PARCEL - TRANSVERSE SECTION (COURTYARD BUILDING) 2
1" = 20'



RETAIL BLOCK
BUILDING HEIGHT: 72'-4"
NUMBER OF STORIES: 3 STORIES
(+3 PARKING LEVELS)

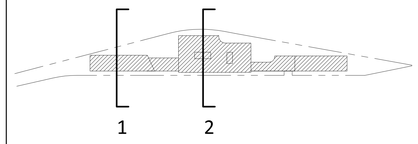


NORTH PARCEL - TRANSVERSE SECTION (RETAIL BLOCK) 1
1" = 20'

KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



LEGEND

- RESIDENTIAL
- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- EARTH

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

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PROJECT ID 18046

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ISSUED ENTITLEMENT 07/01/2024

SECTIONS - NORTH PARCEL

DRAWING TITLE

DATE

SCALE 1" = 20'
WHEN PRINTED ON 30"x42" SHEETS

DRAWING NO. A3.11

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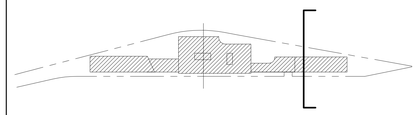
KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



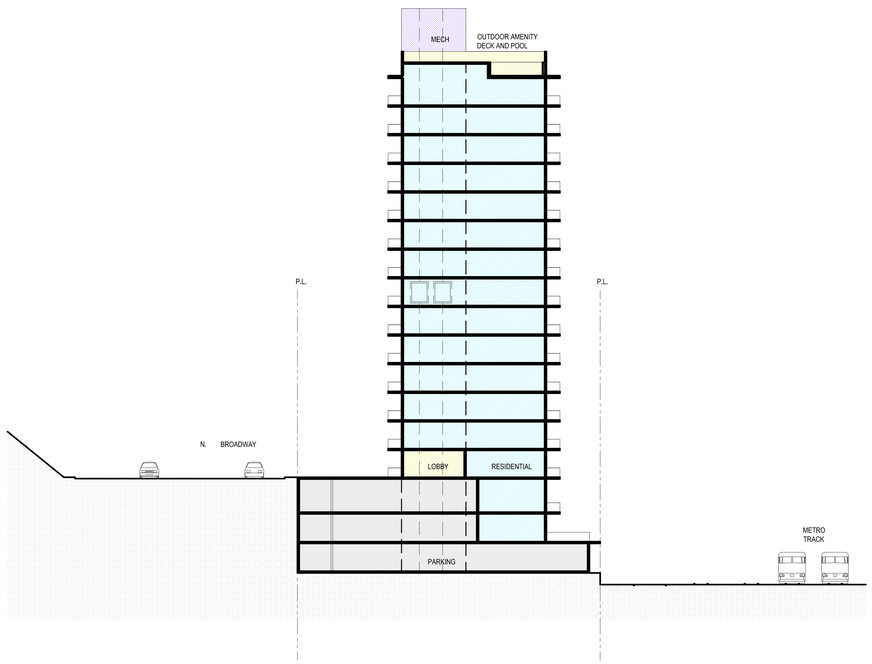
LEGEND

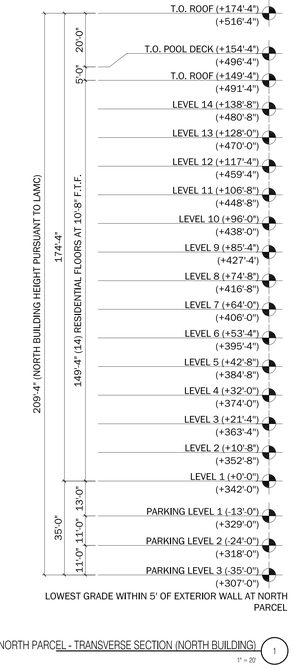
- RESIDENTIAL
- RETAIL
- AMENITY / LOBBY
- PARKING
- SERVICE / MECH RM
- CORES
- EARTH

GENERAL NOTES

1. +0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOMES STREET
2. PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

NORTH BUILDING
BUILDING HEIGHT: 209'-4"
NUMBER OF STORIES: 15 STORIES
(+3 PARKING LEVELS)





NORTH PARCEL - TRANSVERSE SECTION (NORTH BUILDING) 1
1" = 20'

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PROJECT ID: 18046

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REVISIONS

ISSUES
ENTITLEMENT 07/01/2024

DRAWING TITLE: SECTIONS - NORTH PARCEL

SCALE: 1" = 20'
WHEN PRINTED ON 30"x42" SHEET

DRAWING NO.: A3.12

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1 South Parcel - The Courtyards

2 North Parcel - The Terrace Gardens

N

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ISSUE		
	ENTITLEMENT	07/01/2024

Document Title: OVERALL SITE PLAN

Scale: 1" = 80'

Drawing no. L1.10

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View Corridor

1 South Parcel - The Courtyards

2 North Parcel - The Terrace Gardens

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DRAWING TITLE
LANDSCAPE PLAN - PODIUM

SCALE 1" = 80'

DRAWING NO. L2.01

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KEYPLAN: SITE
1" = 500'



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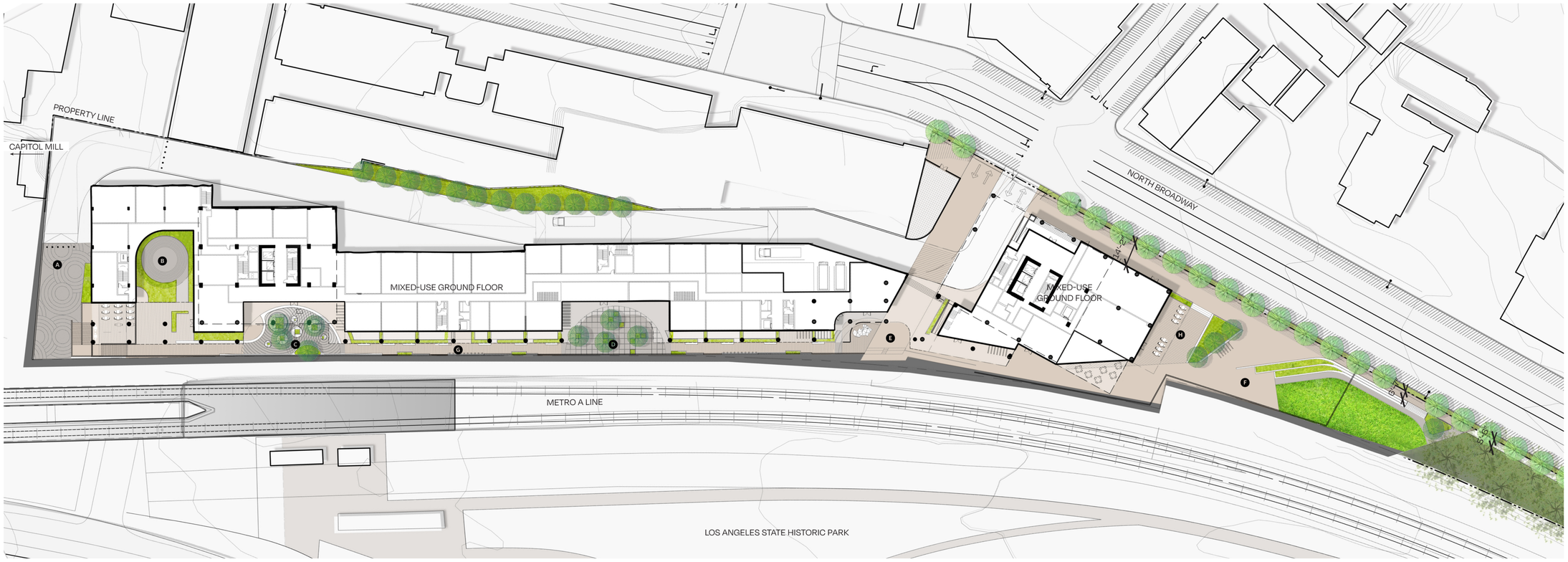

A Hill climb B Fitness green C Entry court D Commons E Gateway F Overlook and Outdoor Amphitheater G Public Promenade H Landscape Trellis

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ISSUE ENTITLEMENT 07/01/2024

SOUTH PARCEL PODIUM

SCALE 1/32" = 1'-0"

DRAWING NO. L2.10

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KEYPLAN: SITE
1" = 500'



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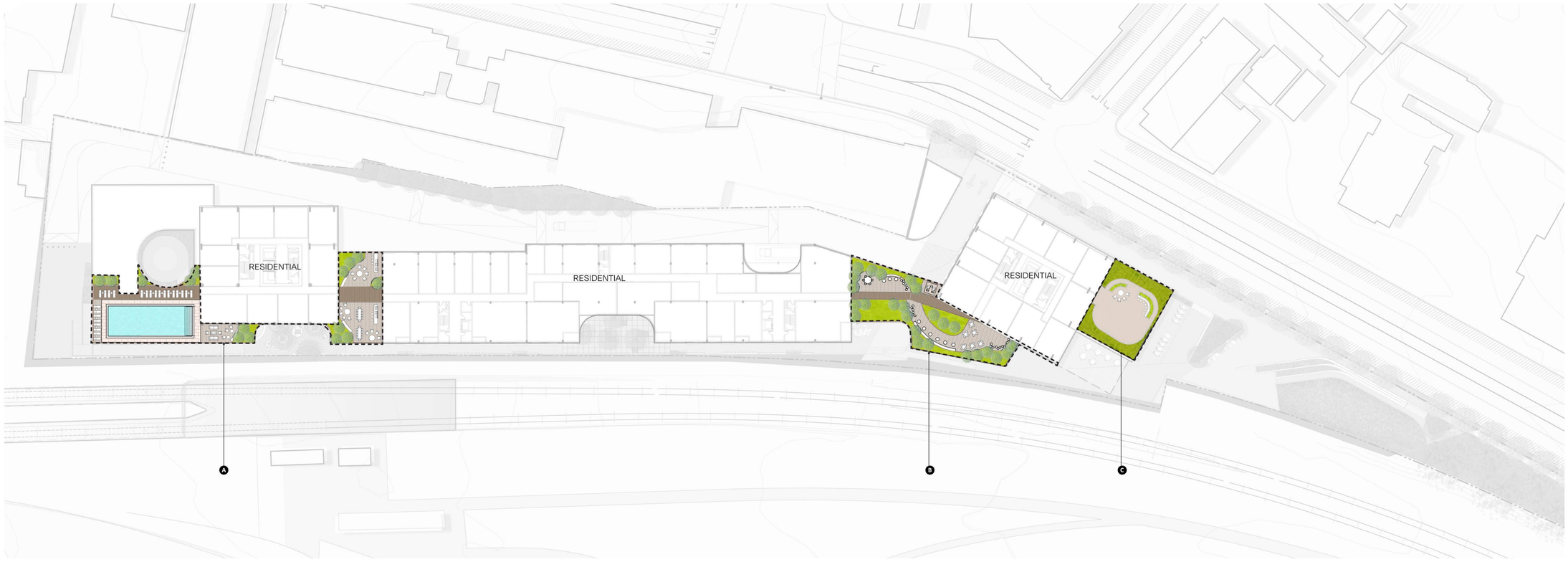

A L-5 South Terrace B L-5 North Terrace C L-5 Amenity Deck

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ISSUE ENTITLEMENT 07/01/2024

SOUTH PARCEL
L5

SCALE 1/32" = 1'-0"

SHEET NO. L2.11

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KEYPLAN: SITE
1" = 500'



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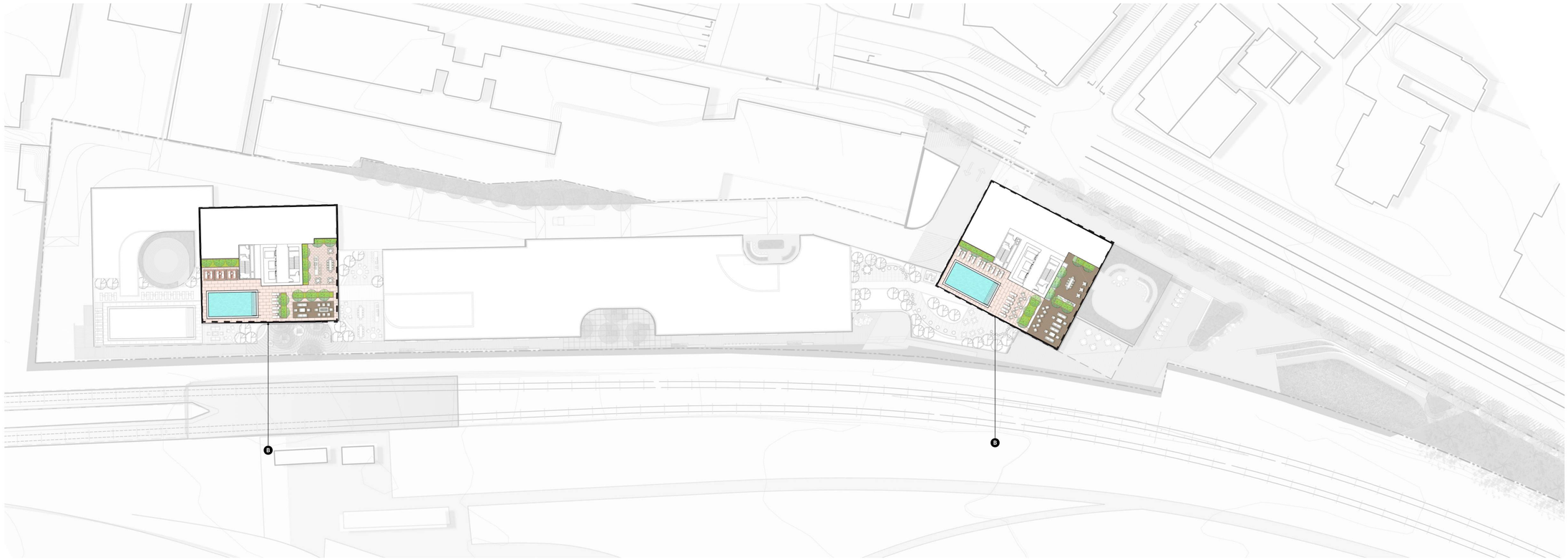

A L-22 North Deck
B L-26 South Deck

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KEYNOTE

ISSUED
ENTITLEMENT 07/01/2024

SOUTH PARCEL ROOF

SCALE PAPER SIZE
1/32" = 1'-0" Tabloid (11" x 17")

DRAWING NO.
L2.12

N

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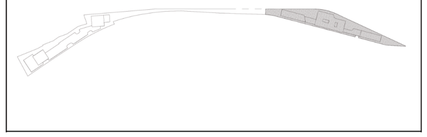
KEYPLAN: SITE
1" = 500'



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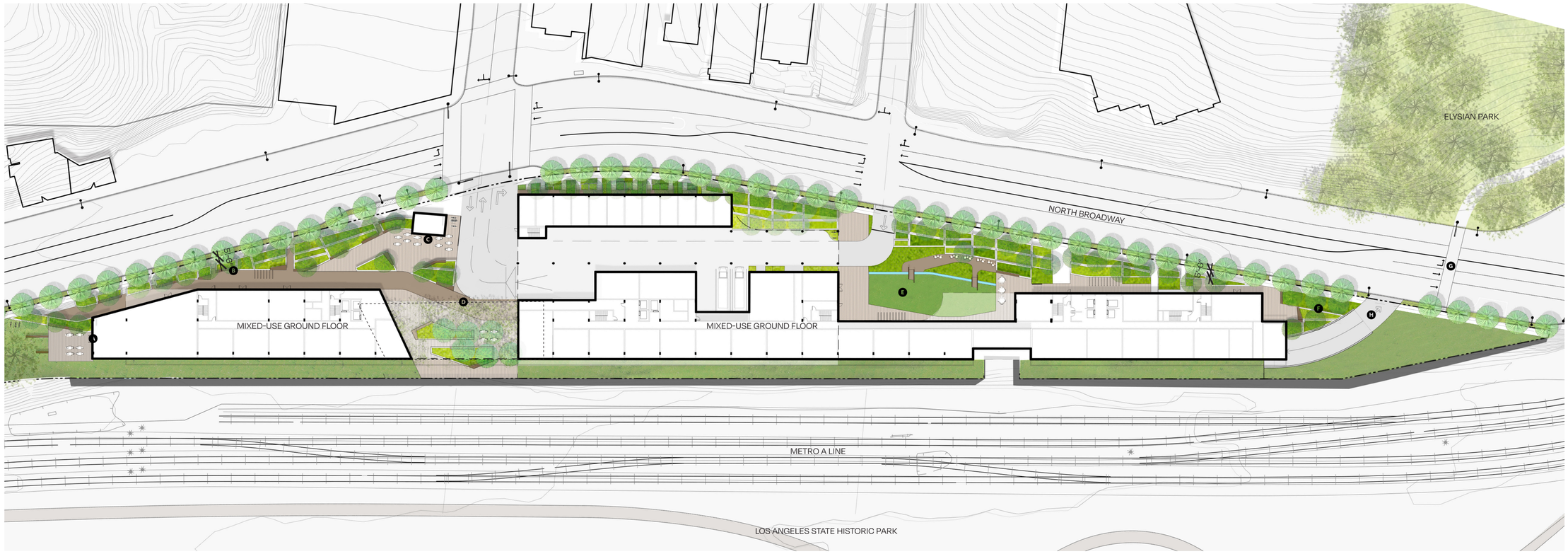

A Garden dining terrace
B Public shopping gardens
C Public garden plaza & kiosk
D Landscape Trellis
E Meditation gardens
F Elysian garden connection
G Crosswalk
H Ramp to Parking

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NORTH PARCEL PODIUM

SCALE 1/32" = 1'-0"

N

DRAWING NO. L2.20

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KEYPLAN: SITE
1" = 500'



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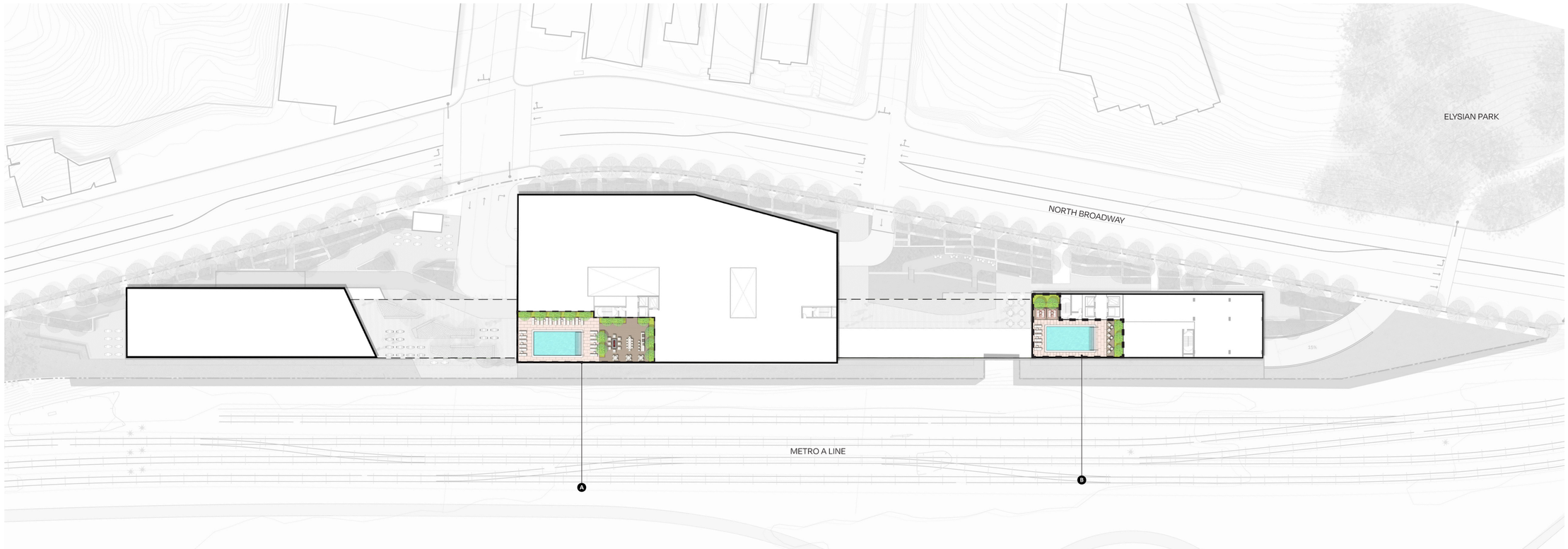

A L-6 South Terrace
B L-14 North Penthouse Terrace

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ENTITLEMENT 07/01/2024

NORTH PARCEL TERRACES

SCALE 1/32" = 1'-0"

N

SHEET NO.
L2.21

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KEYPLAN: SITE
1" = 500'



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A Slope & Landscape Planted Zone
B Garden dining terrace
C Overlook and Outdoor Amphitheater
D Billboards (existing may remain)
Central green space landscaping: 49380 GSF

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DRAWING TITLE
CENTRAL GREENSPACE

SCALE 1/32" = 1'-0"
WHEN PRINTED ON 30"X42" SHEET

DRAWING NO.
L2.30

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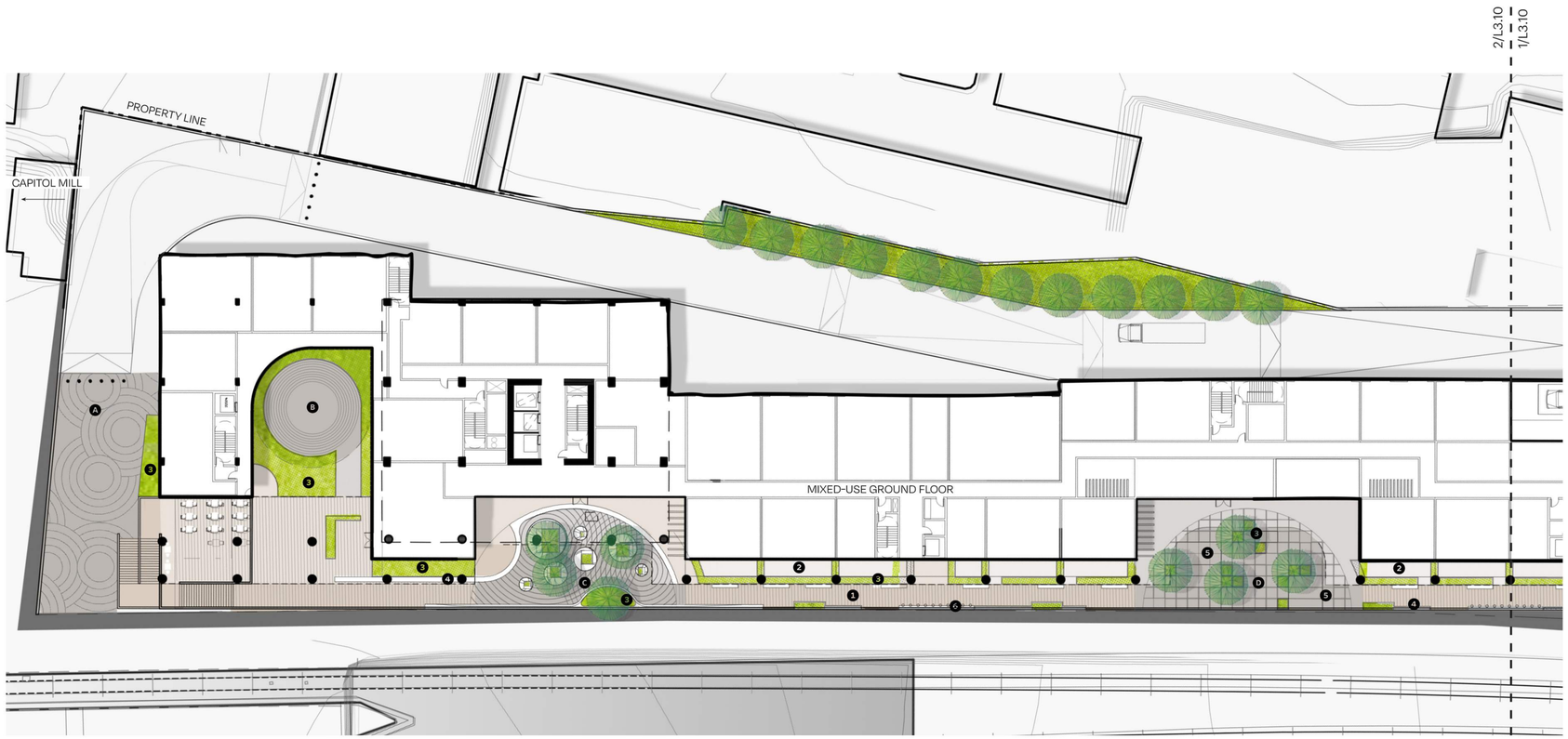
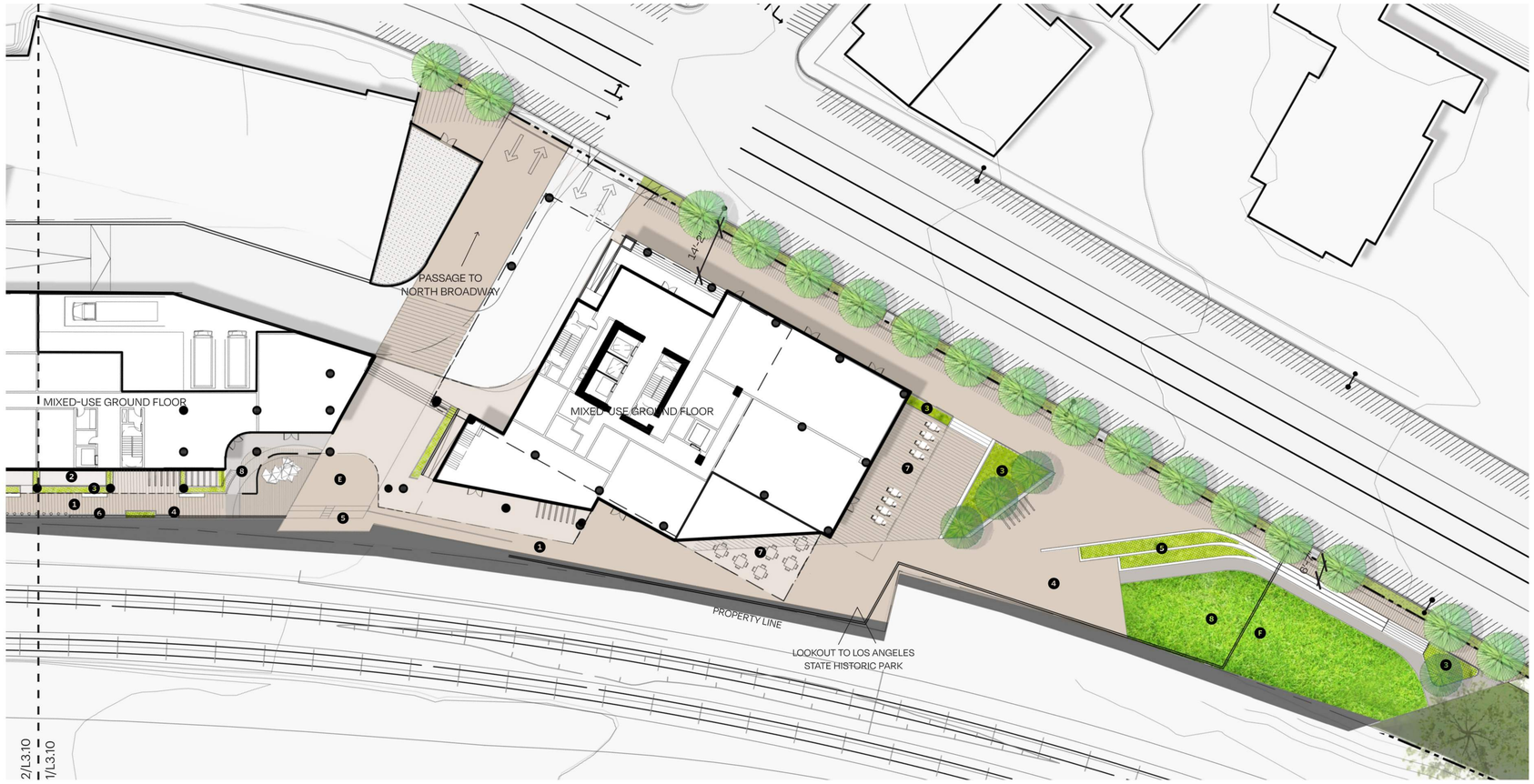
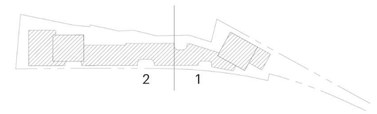




KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



COURTYARDS LEGEND :

- A "Hill climb" south stair with activated stair landing
- B Fitness green courtyard
- C "Entry court" courtyard
- D "Commons" courtyard
- E "Gateway" courtyard
- F "Overlook" courtyard

AMENITIES LEGEND :

1. Public promenade
2. Unit terraces
3. Raised planter
4. Bench seating
5. Social seating and lookout
6. Raised counter
7. Cafe / restaurant seating area
8. Outdoor amphitheatre

N

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DRAWING TITLE
SOUTH PARCEL PODIUM - ENLARGEMENT

SCALE 1" = 20'

DRAWING NO. L3.10

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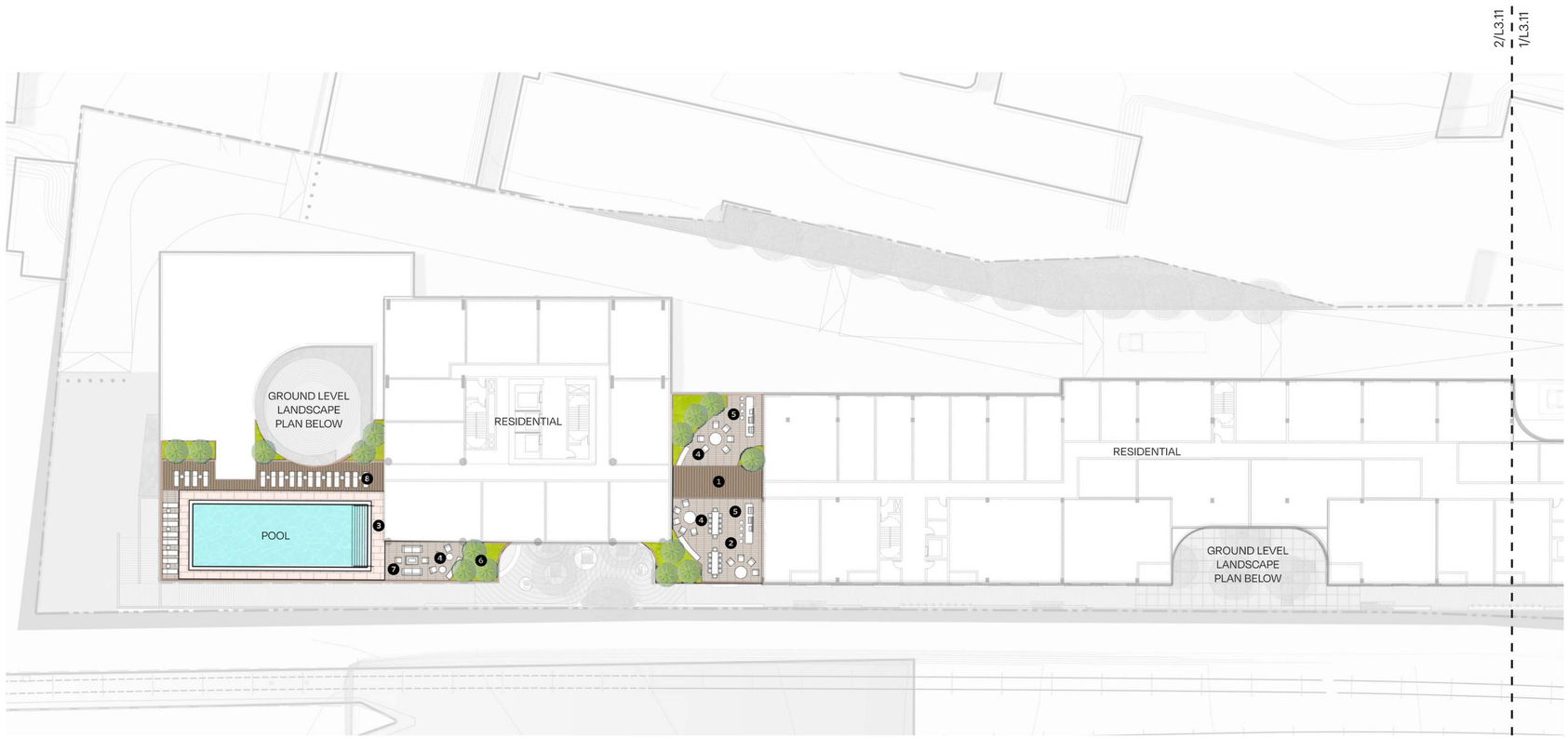
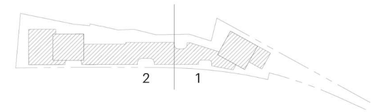




KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



AMENITIES LEGEND :

1. Flooring material 1 - wood
2. Flooring material 2 - stone
3. Flooring material 3 - paved pool deck
4. Outdoor dining area
5. Barbecue area
6. Raised planter with adjacent seating
7. Outdoor lounge area
8. Glass enclosure gate
9. Outdoor lawn area

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1	ENTITLEMENT	07/01/2024

Drawing Title: SOUTH PARCEL LEVEL 5 - ENLARGEMENT

Scale: 1" = 20'

Drawing No.: L3.11

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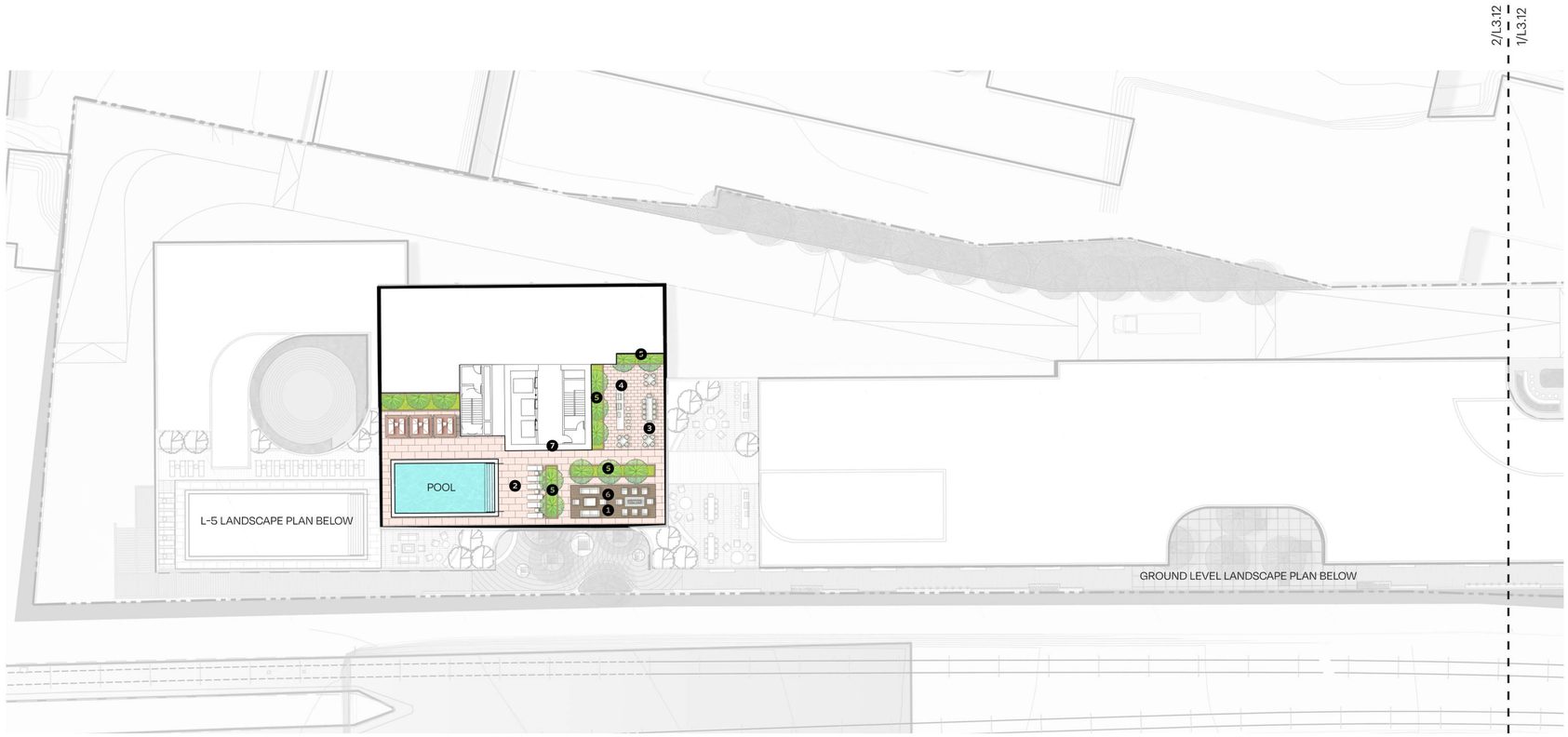
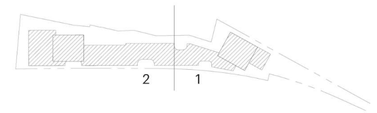




KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



AMENITIES LEGEND :

1. Flooring material 1 - wood
2. Flooring material 3 - paved pool deck
3. Outdoor dining area
4. Barbecue area
5. Raised planter with adjacent seating
6. Outdoor lounge area
7. Gate

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SOUTH PARCEL ROOF - ENLARGEMENT

SCALE 1" = 20'

Drawing No. L3.12

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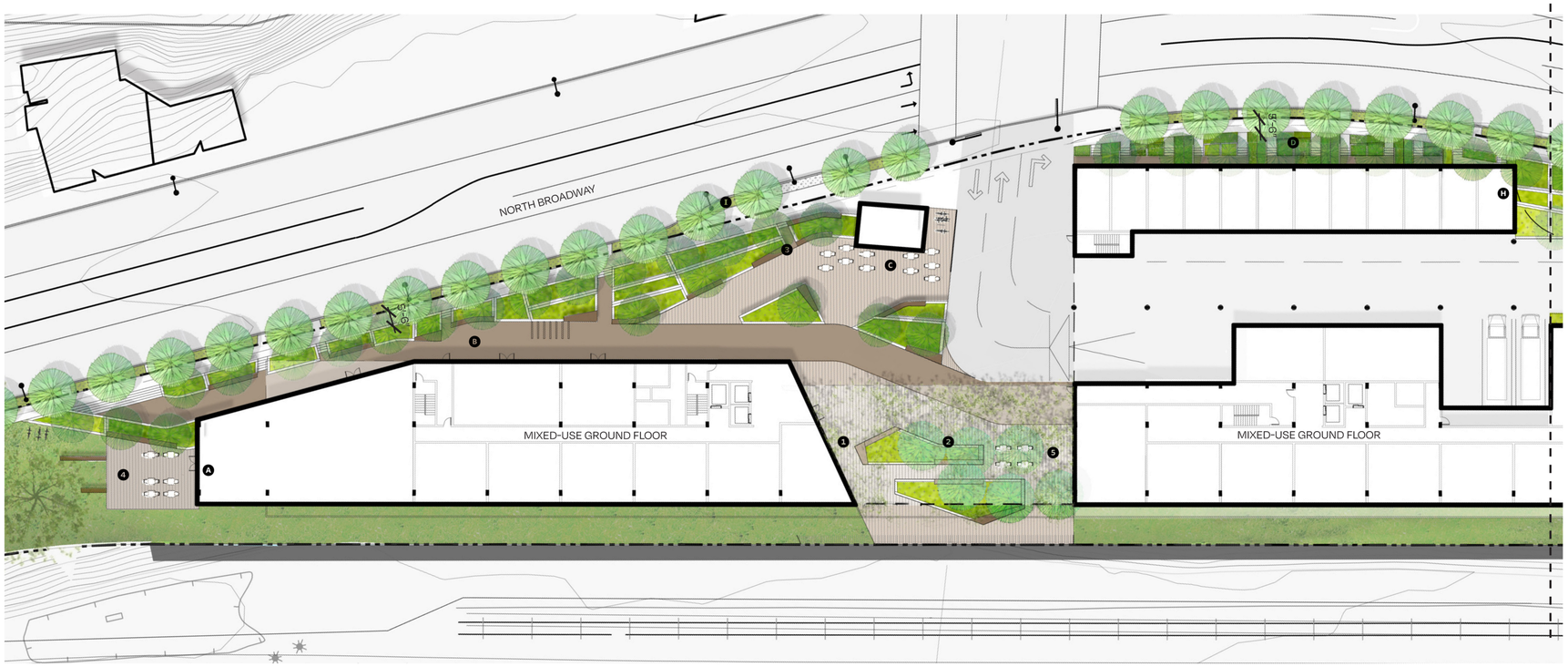
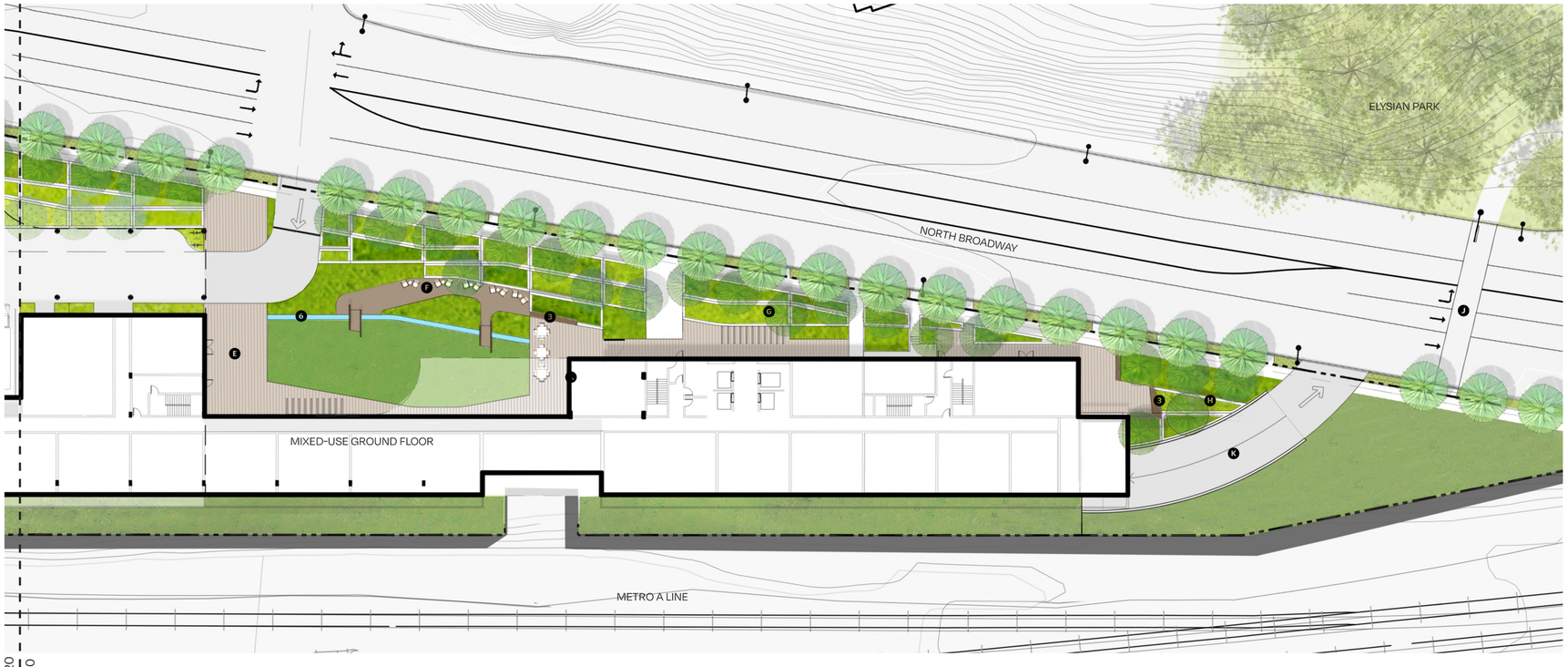
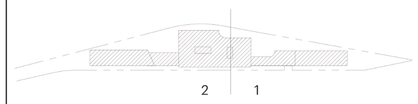




KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



GARDEN TERRACES LEGEND :

- A Garden dining terrace
- B Public shopping gardens
- C Public garden plaza & kiosk
- D Front door garden terraces
- E Lobby courtyard gardens
- F Meditation gardens
- G Dining & Amenity gardens
- H Stepped garden terraces
- I North Broadway streetscape
- J Proposed signalized crosswalk
- K Ramp to parking

AMENITIES LEGEND :

- 1 Trellis canopy
- 2 Raised planter
- 3 Bench seating
- 4 Social seating and lookout
- 5 Cafe / restaurant seating
- 6 Water rill feature

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DRAWING TITLE
NORTH PARCEL PODIUM - ENLARGEMENT

SCALE 1" = 20'

DRAWING NO. L3.20

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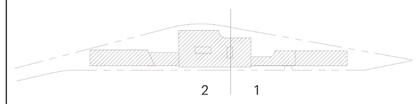
KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



AMENITIES LEGEND :

1. Flooring material 1 - wood
2. Flooring material 3 - paved pool deck
3. Outdoor dining area
4. Barbecue area
5. Raised planter
6. Outdoor fireplace and lounge area
7. Gate
8. Outdoor lounge area

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Drawing Title
NORTH PARCEL TERRACES - ENLARGEMENT

Scale
1" = 20'

Drawing No.
L3.21

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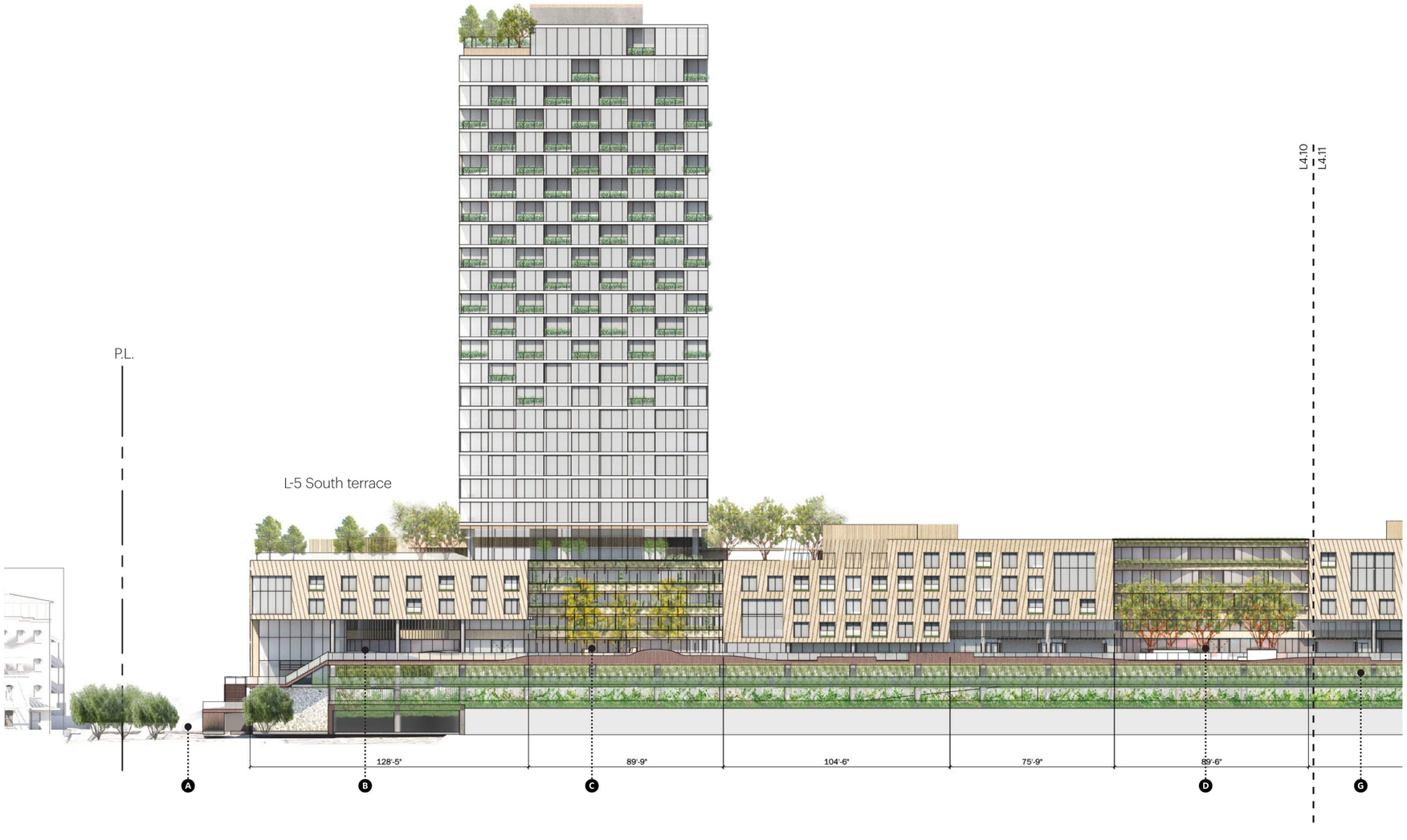
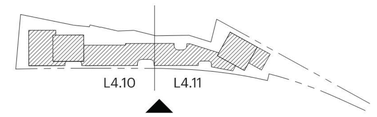
L-26 South deck



KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



COURTYARDS LEGEND :

- Ⓐ "Hill climb" south stair with activated stair landing
- Ⓑ Fitness green courtyard
- Ⓒ "Entry court" courtyard
- Ⓓ "Commons" courtyard
- Ⓔ "Gateway" courtyard
- Ⓕ "Overlook" courtyard
- Ⓖ Parking screened with landscaped green wall

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DRAWING TITLE: ELEVATION - SOUTH PARCEL

SCALE: 1" = 20'

DRAWING NO. L4.10

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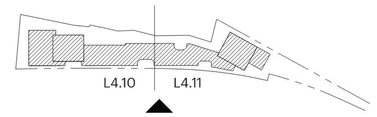
KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



COURTYARDS LEGEND :

- **A** "Hill climb" south stair with activated stair landing
- **B** Fitness green courtyard
- **C** "Entry court" courtyard
- **D** "Commons" courtyard
- **E** "Gateway" courtyard
- **F** "Overlook" courtyard
- **G** Parking Screened with Landscaped Green Wall

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DRAWING TITLE
ELEVATION - SOUTH PARCEL

SCALE
1" = 20'

DRAWING NO.
L4.11

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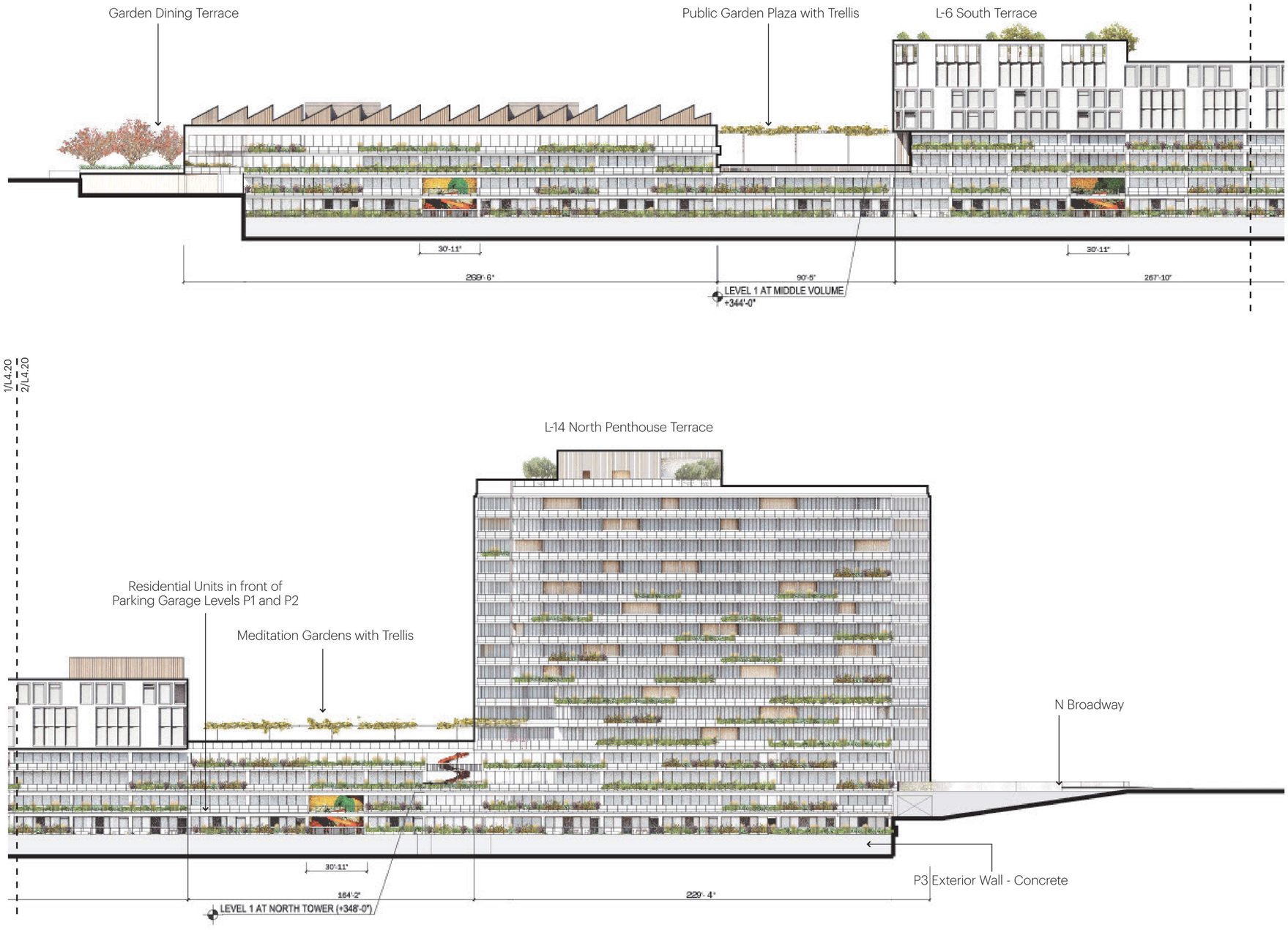
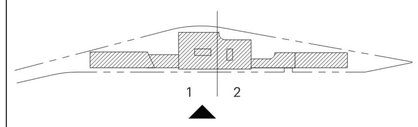


KEYPLAN: SITE
1" = 500'



KEYPLAN: NORTH PARCEL
1" = 200'



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DRAWING TITLE
ELEVATION - NORTH PARCEL

SCALE 1" = 20'

DRAWING NO.
L4.20

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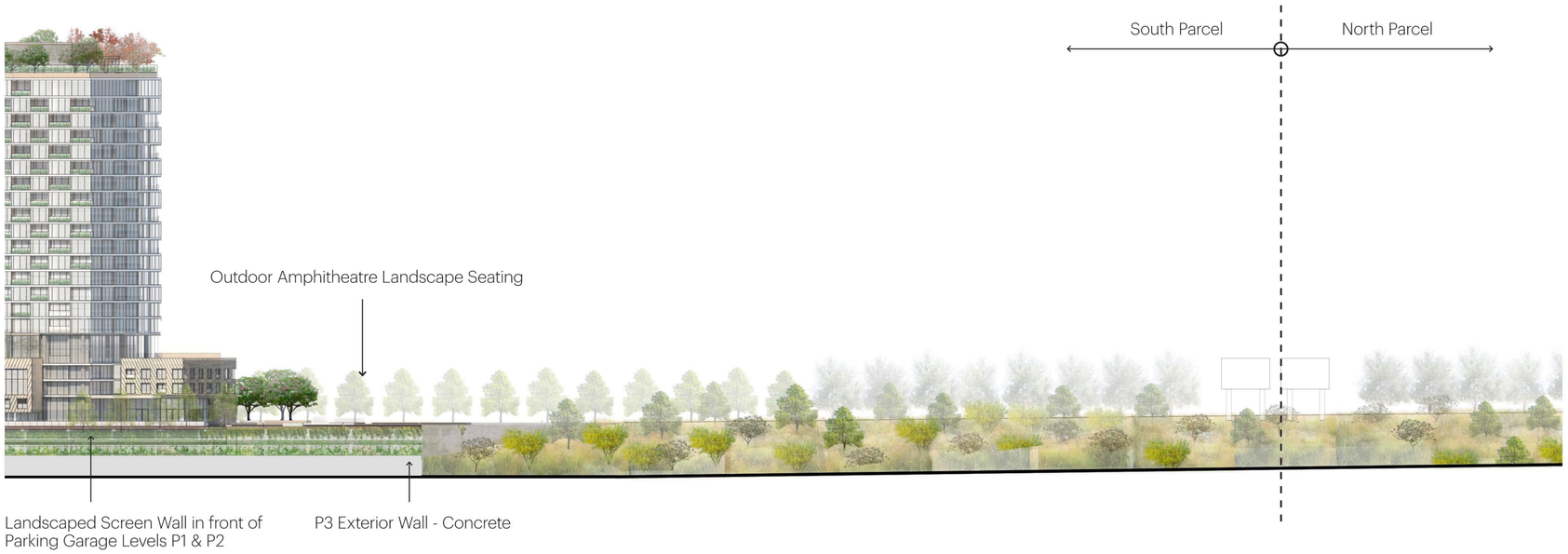
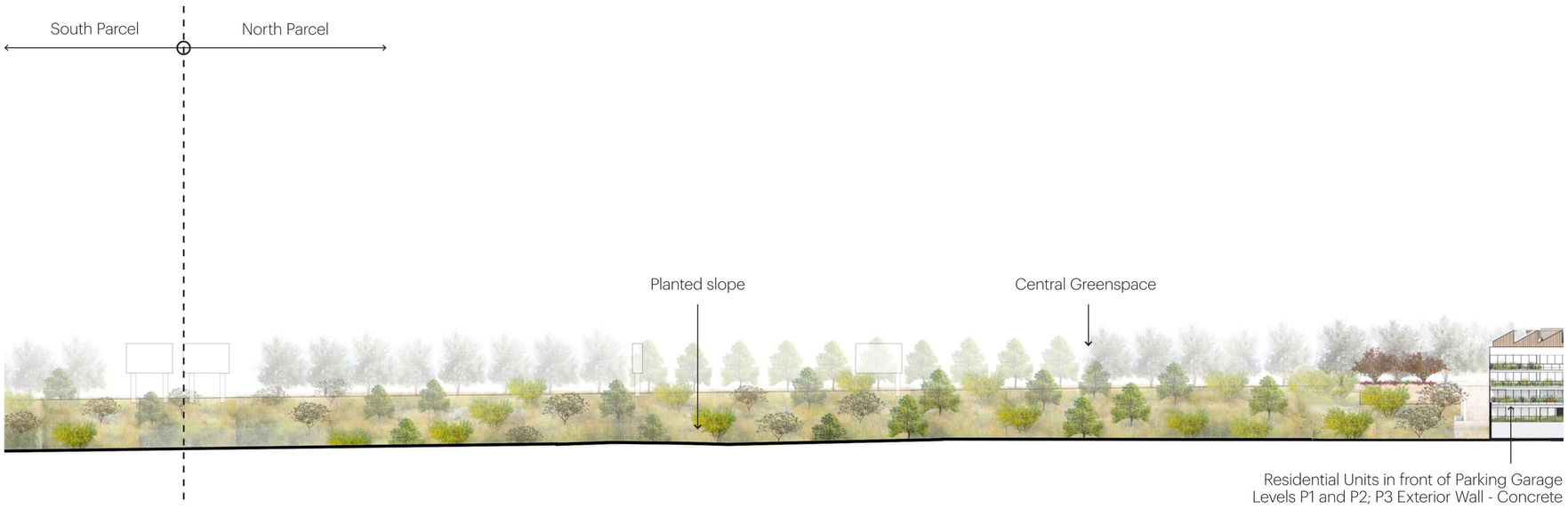
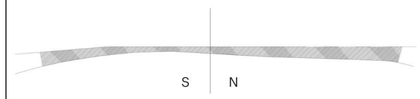




KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



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ELEVATION - CENTRAL GREEN

SCALE 1" = 20'

DRAWING NO. L4.30

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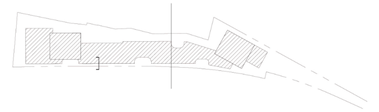
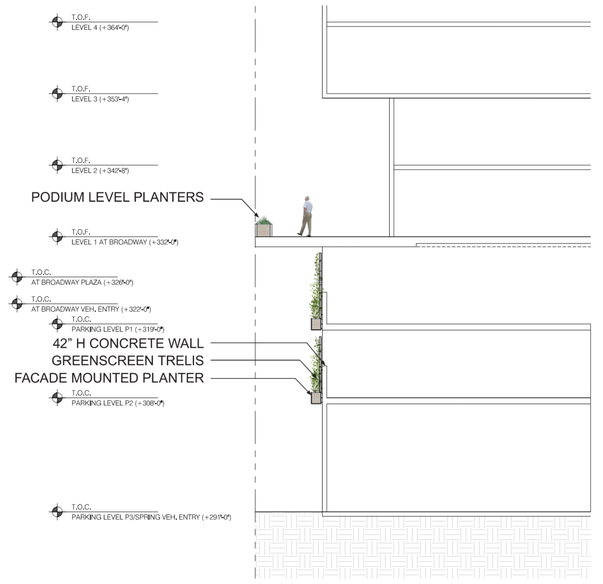
KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'





GREENSCREEN SOUTH PARCEL PODIUM GARAGE, TYP 1

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DRAWING TITLE
GREENWALL SECTION

SCALE 1/8" = 1'-0"

DRAWING NO. L5.00

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PLANTING PALETTES

I. SOUTH PARCEL (EXCLUDE CENTRAL OPEN SPACE)

Trees			
BOTANICAL NAME	**COMMON NAME**	**WUCOLS**	**Quantity**
Agonis flexulosa	Peppermint Tree	L	12
Arbutus unedo	Strawberry Tree	L	16
Cercis canadensis	Eastern Redbud	M	15
Chilopsis linearis	Desert Willow *	VL	5
Erythrina coralloides	Naked Coral Tree	L	12
Gingko biloba	Maidenhair Tree	M	4
Koelreuteria bipinnata	Chinese Flame Tree	M	29
Lyonothamnus floribundus	Catalina Ironwood *	L	5
Shrubs And Grasses			
Mix SP-01: Arrival Plazas			
Aloe arborecens	Torch Aloe	L	
Hesperoyucca whipplei	Chaparral Yucca *	VL	
Mimulus aurantiacus	Sticky Monkey Flower *	VL	
Yucca filimentosa	Adams Needle	VL	
Mix SP-02: Scenic Broadwalk			
Aristida purpurea	Purple Three-Awn *	VL	
Mimulus aurantiacus	Sticky Monkey Flower *	VL	
Salvia mellifera	Black Sage *	VL	
Mix SP-03: Activity Spaces			
Arctostaphylos 'Howard McMinn'	Manzanita *	L	
Aristida purpurea	Purple Three-Awn *	VL	
Leymus condensatus 'Canyon Prince'	Canyon Prince Wild Rye *	L	
Yucca filimentosa	Adams Needle	VL	
Mix SP-04: Level 5 Podium			
Aristida purpurea	Purple Three-Awn *	VL	
Bulbine frutescens	Bulbine	L	
Lomandra longifolia 'Nyalla'	Nyalla Mat Rush	L	
Mimulus aurantiacus	Sticky Monkey Flower *	VL	
Mix SP-05: Rooftop			
Aloe arborecens	Torch Aloe	L	
Arctostaphylos 'Howard McMinn'	Manzanita *	L	
Bulbine frutescens	Bulbine	L	
Yucca filimentosa	Adams Needle	VL	
Vines			
Ficus pumila	Creeping Fig	M	
Lawn			
	Delta Grassland Mix™	M	

II. NORTH PARCEL (EXCLUDE CENTRAL OPEN SPACE)

Trees			
Botanical Name	**Common Name**	**WUCOLS**	**Quantity**
Arbutus unedo	Strawberry Tree	L	6
Cercis canadensis	Eastern Redbud	M	5
Citrus limon	Lemon Tree	M	4
Diospyros texana	Texas Persimmon	M	4
Erythrina coralloides	Naked Coral Tree	L	2
Koelreuteria bipinnata	Chinese Flame Tree	M	16
Lyonothammus floribundus	Catalina Ironwood *	L	42
Platanus racemosa	California Sycamore *	M	3
Shrubs And Grasses			
Mix NP-01: Garden Terraces			
Eriogonum grande rubescens	Red-floered Buckwheat *	VL	
Helichrysum italicum	Strawflower	L	
Lavandula dentata Var. Cadicans	French Lavender	L	
Salvia greggii	Autumn Sage	L	
Salvia spathacea	Hummingbird Sage *	L	
Yucca filimentosa	Adams Needle	VL	
Mix NP-02: Rejuvenation Spots			
Aristida purpurea	Purple Three-Awn *	VL	
Bougainvillea 'Rosenka'	Rosenka Bougainvillea	L	
Salvia mellifera	Black Sage *	VL	
Salvia officianlis	Common Sage	M	
Mix NP-03: Rooftop			
Salvia greggii	Autumn Sage	L	
Salvia spathacea	Hummingbird Sage *	L	
Yucca filimentosa	Adams Needle	VL	

III. CENTRAL GREEN SPACE

Trees			
BOTANICAL NAME	**COMMON NAME**	**WUCOLS**	**Quantity**
Parkinsonia praecox	Sonoran Palo Verde	VL	11
Lyonothammus floribundus	Catalina Ironwood *	L	11
Chilopsis linearis	Desert Willow *	VL	10
Shrubs And Grasses			
Mix CG-01: Central Green Space			
Aristida purpurea	Purple Three-Awn *	VL	
Artemisia californica	California Sagebush *	VL	
Eriogonum fasciculatum	California Buckwheat *	VL	
Hesperoyucca whipplei	Chaparral Yucca *	VL	
Yucca filimentosa	Adams Needle	VL	
Salvia mellifera	Black Sage *	VL	

IV. STREETSCAPE

Trees			
BOTANICAL NAME	**COMMON NAME**	**WUCOLS**	**Quantity**
Quercus agrifolia	Coast Live Oak *	VL	110
Shrubs And Grasses			
Mix SW-01: Sidewalk			
Hesperoyucca whipplei	Chaparral Yucca *	VL	
Yucca filimentosa	Adams Needle	VL	

TREE COUNTS

I. TREES TO BE ADDED TO PROJECT SITE

SOUTH PARCEL

Botanical Name	Common Name	Quantity
Agonis flexulosa	Peppermint Tree	12
Arbutus unedo	Strawberry Tree	16
Cercis canadensis	Eastern Redbud	15
Chilopsis linearis	Desert Willow *	9
Erythrina coralloides	Naked Coral Tree	12
Gingko biloba	Maidenhair Tree	4
Koelreuteria bipinnata	Chinese Flame Tree	29
Lyonothammus floribundus	Catalina Ironwood *	9
Parkinsonia praecox	Sonoran Palo Verde	4
Total		110

NORTH PARCEL

Botanical Name	Common Name	Quantity
Arbutus unedo	Strawberry Tree	6
Cercis canadensis	Eastern Redbud	5
Chilopsis linearis	Desert Willow *	6
Citrus limon	Lemon Tree	4
Diospyros texana	Texas Persimmon	4
Erythrina coralloides	Naked Coral Tree	2
Koelreuteria bipinnata	Chinese Flame Tree	16
Lyonothammus floribundus	Catalina Ironwood *	49
Parkinsonia praecox	Sonoran Palo Verde	7
Platanus racemosa	California Sycamore *	3
Total		102

STREET TREES

BOTANICAL NAME	COMMON NAME	Quantity
Quercus agrifolia	Coast Live Oak *	110
Total		110

PROJECT TOTAL:

		Quantity
On-Site Trees		212
Street Trees		110
Total		322

II. TREES TO BE REMOVED

On-Site Trees		
Botanical Name	**Common Name**	**Quantity**
Phoenix canariensis	Canary Island Date Palm	2
Washingtonia filifera	Desert Fan Palm	17
Washingtonia robusta	Mexican fan palm	1
Street Trees		
jacaranda mimosafolia	Blue Jacaranda	3
Total		23

Note:
1. None of the above trees are protected under Los Angeles City's Protected Tree and Shrubs Ordinance No. 186,873.
2. LA County Department of Public Works' Tree Replacement Policy requires a 2 : 1 ratio (Tree Replacement: Tree Removal) for every street tree removed.

** denotes S. California Native*

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ISSUED ENTITLEMENT 07/01/2024

DRAWING TITLE PLANTING SCHEDULE

SCALE N.T.C. WHEN PRINTED ON 30"x42" SHEET

DRAWING NO. L6.00

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I. SOUTH PARCEL - Planting Palette - Trees

Ground level Trees




Agonis flexulosa
Peppermint Tree

Water Use: Low
36" Box




Arbutus unedo
Strawberry Tree

Water Use: Low
36" Box




Ginkgo biloba
Maidenhair Tree

Water Use: Mod
36" Box




Koelreuteria Bipinnata
Chinese Flame Tree

Water Use: Mod
36" Box

Upper Level Terrace Trees




Arbutus unedo
Strawberry Tree

Water Use: Low
36" Box




Erythrina coralloides
Naked Coral Tree

Water Use: Low
36" Box



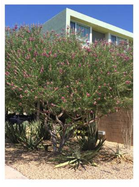

Cercis canadensis
Eastern Redbud

Water Use: Mod
24" Box




Koelreuteria Bipinnata
Chinese Flame Tree

Water Use: Mod
36" Box




Chilopsis linearis *
Desert Willow

Water Use: V. Low
36" Box




Lyonothamnus floribundus *
Catalina Ironwood

Water Use: Low
36" Box

II. NORTH PARCEL - Planting Palette - Trees

Ground level Trees




Arbutus unedo
Strawberry Tree

Water Use: Low
36" Box




Koelreuteria Bipinnata
Chinese Flame Tree

Water Use: Mod
36" Box




Lyonothamnus floribundus *
Catalina Ironwood

Water Use: Low
36" Box

Upper Level Terrace Trees



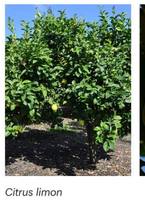

Cercis canadensis
Eastern Redbud

Water Use: Mod
24" Box




Erythrina coralloides
Naked Coral Tree

Water Use: Low
36" Box



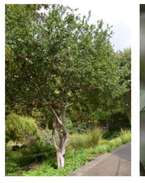

Citrus limon
Lemon Tree

Water Use: Mod
24" Box




Platanus racemosa *
California Sycamore

Water Use: Mod
24" Box

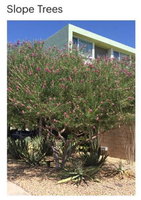



Diospyros texana
Persimmon Tree

Water Use: Mod
24" Box

III. CENTRAL GREEN SPACE - Planting Palette - Trees

Slope Trees




Chilopsis linearis *
Desert Willow

Water Use: V. Low
24" Box




Lyonothamnus floribundus *
Catalina Ironwood

Water Use: Low
36" Box

Parkinsonia praecox
Sonoran Palo Verde

Water Use: V. Low
24" Box

IV. STREETSCAPE - Planting Palette - Trees

Street Trees

Quercus agrifolia *
Coast Live Oak

Water Use: V. Low
36" Box

** denotes S. California Native*

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PLANT IMAGERY

SCALE N.T.C.

DRAWING NO.
L6.01

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I. SOUTH PARCEL - Planting Palette - Understory Shrubs Grasses and Vines

Mix SP-01: Arrival Plazas


Aloe arborescens — Torch Aloe — Water Use: Low — 5 Gal, 36" o.c.


Hesperoyucca whipplei * — Chaparral yucca — Water Use: V. Low — 5 Gal, 36" o.c.


Mimulus aurantiacus * — Sticky Monkey-flower — Water Use: V. Low — 2 Gal, 30" o.c.


Yucca filamentosa — Adams Needle — Water Use: V. Low — 5 Gal, 36" o.c.

Mix SP-02: Scenic Broadwalk


Aristida purpurea * — Purple Three-awn — Water Use: V. Low — 2 Gal, 24" o.c.


Mimulus aurantiacus * — Sticky Monkey-flower — Water Use: V. Low — 2 Gal, 30" o.c.


Salvia mellifera * — Black Sage — Water Use: V. Low — 2 Gal, 30" o.c.

Mix SP-03: Activity Spaces


Arctostaphylos 'Howard McMinn' * — Manzanita — Water Use: Low — 15 Gal, 48" o.c.


Aristida purpurea * — Purple Three-awn — Water Use: V. Low — 2 Gal, 24" o.c.


Leymus condensatus 'Canyon Prince' * — Canyon Prince Wild Rye — Water Use: Low — 2 Gal, 24" o.c.


Yucca filamentosa — Adams Needle — Water Use: V. Low — 5 Gal, 36" o.c.

Mix SP-04: Level 5 Podium


Aristida purpurea * — Purple Three-awn — Water Use: V. Low — 2 Gal, 24" o.c.


Bulbine frutescens — Bulbine — Water Use: Low — 1 Gal, 24" o.c.


Lomandra longifolia 'Nyalla' — Nyalla Mat Rush — Water Use: Low — 2 Gal, 24" o.c.


Mimulus aurantiacus * — Sticky Monkey-flower — Water Use: V. Low — 2 Gal, 30" o.c.

Mix SP-05: Rooftop


Aloe arborescens — Torch Aloe — Water Use: Low — 5 Gal, 36" o.c.


Arctostaphylos 'Howard McMinn' * — Manzanita — Water Use: Low — 15 Gal, 48" o.c.


Bulbine frutescens — Bulbine — Water Use: Low — 1 Gal, 24" o.c.


Yucca filamentosa — Adams Needle — Water Use: V. Low — 5 Gal, 36" o.c.

Vines


Ficus pumila — Creeping Fig — Water Use: Mod — 1 Gal, 18" o.c.

II. NORTH PARCEL - Planting Palette - Understory Shrubs Grasses and Vines

Mix NP-01: Garden Terraces


Eriogonum grande rubescens * — Red-flowered Buckwheat — Water Use: Low — 1 Gal, 18" o.c.


Helichrysium italicum — Strawflower — Water Use: Low — 1 Gal, 18" o.c.


Lavandula dentata var. cadicans — French Lavender — Water Use: Low — 1 Gal, 18" o.c.


Salvia greggii — Autumn Sage — Water Use: Low — 1 Gal, 18" o.c.


Salvia spathacea * — Hummingbird sage — Water Use: Low — 2 Gal, 36" o.c.


Yucca filamentosa — Adams Needle — Water Use: V. Low — 5 Gal, 36" o.c.

Mix NP-02: Rejuvenation Spots


Aristida purpurea * — Purple Three-awn — Water Use: V. Low — 2 Gal, 24" o.c.


Bougainvillea 'Rosenka' — Rosenka Bougainvillea — Water Use: Low — 2 Gal, 36" o.c.


Salvia mellifera * — Black Sage — Water Use: V. Low — 2 Gal, 30" o.c.


Salvia officianlis — Common Sage — Water Use: Mod — 1 Gal, 18" o.c.

Mix NP-03: Rooftop


Salvia greggii — Autumn Sage — Water Use: Low — 1 Gal, 18" o.c.


Salvia spathacea * — Hummingbird sage — Water Use: Low — 2 Gal, 36" o.c.


Yucca filamentosa — Adams Needle — Water Use: V. Low — 5 Gal, 36" o.c.

III. CENTRAL GREEN SPACE - Planting Palette - Understory Shrubs Grasses and Vines

Mix CG-01: Central Green Space


Aristida purpurea * — Purple Three-awn — Water Use: V. Low — 1 Gal, 24" o.c.


Artemisia californica * — California Sagebush — Water Use: V. Low — 1 Gal, 36" o.c.


Eriogonum fasciculatum * — California Buckwheat — Water Use: V. Low


Hesperoyucca whipplei * — Chaparral yucca — Water Use: V. Low


Salvia mellifera * — Black Sage — Water Use: V. Low — 2 Gal, 30" o.c.


Yucca filamentosa — Adams Needle — Water Use: V. Low — 5 Gal, 36" o.c.

IV. STREETSCAPE - Planting Palette - Understory Shrubs Grasses and Vines

Mix SW-01: Sidewalk


Hesperoyucca whipplei * — Chaparral yucca — Water Use: V. Low — 1 Gal, 36" o.c.

Yucca filamentosa — Adams Needle — Water Use: V. Low — 5 Gal, 36" o.c.

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1 Gal 36" o.c.

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SCALE N.T.C.

DRAWING NO. L6.02

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SOUTH PARCEL

BUENA VISTA RESIDENTIAL

MAWA	MAWA = (ETo) (0.62) [(ETAFx LA) + ((1 –ETAF) x SLA)]			
ETAF	0.55			
ANNUAL Eto	AREA	SLA	MAWA	
50.1	23,429.00	0.00	**400,294.44**	GALLONS / YEAR

ETWU	ETWU = (Eto x 0.62) x [PF HA/IE)+SLA)]	

DEFINITIONS	
Eto	Reference Evapotranspiration Rate, Based on City designation
LA	Landscaped area
SLA	Special landscaped area WITHIN the landscaped area
P.F.	Plant water use factor- WUCLOS
H.A.	Hydro zone area = Irrigated area
I.E.	Irrigation efficiency. Must exceed 0.71.

VALVE	HYDROZONE	HYDROZONE	WATER USE	PLANT FACTOR	AREA	IE	PFxHA/IE	IRRIGATION
	A	HIGH	HIGH	0.7	0	0.75	0	OVERHEAD
	B	MED	MEDIUM	0.5	204	0.81	125.9259259	DRIP
	C	LOW	LOW	0.2	8003	0.81	1976.049383	DRIP
	D	VERY LOW	VERY LOW	0.1	12422	0.81	1533.580247	DRIP
	E	POOL AND SPA	HIGH	1	2800	1	2800	NONE
					23,429.00		6,435.56	

TOTALS **ETWU 199,901.23 GALLONS / YEAR**

IN COMPLIANCE

BUENA VISTA NON-RESIDENTIAL

MAWA	MAWA = (ETo) (0.62) [(ETAFx LA) + ((1 –ETAF) x SLA)]			
ETAF	0.45			
ANNUAL Eto	AREA	SLA	MAWA	
50.1	9,459.00	0	**132,248.02**	GALLONS / YEAR

ETWU	ETWU = (Eto x 0.62) x [PF HA/IE)+SLA)]	

DEFINITIONS	
Eto	Reference Evapotranspiration Rate, Based on City designation
LA	Landscaped area
SLA	Special landscaped area WITHIN the landscaped area
P.F.	Plant water use factor- WUCLOS
H.A.	Hydro zone area = Irrigated area
I.E.	Irrigation efficiency. Must exceed 0.71.

VALVE	HYDROZONE	HYDROZONE	WATER USE	PLANT FACTOR	AREA	IE	PFxHA/IE	IRRIGATION
	A	HIGH	HIGH	0.7	0	0.75	0	OVERHEAD
	B	MED	MEDIUM	0.5	3960	0.81	2444.444444	DRIP
	C	LOW	LOW	0.2	1546	0.81	381.7283951	DRIP
	D	VERY LOW	VERY LOW	0.1	3653	0.81	450.9876543	DRIP
	E	WATER FEATURE	HIGH	1	300	1	300	NONE
					9,459.00		3,577.16	

TOTALS **ETWU 111,113.76 GALLONS / YEAR**

IN COMPLIANCE

NORTH PARCEL

BUENA VISTA RESIDENTIAL

MAWA	MAWA = (ETo) (0.62) [(ETAFx LA) + ((1 –ETAF) x SLA)]			
ETAF	0.55			
ANNUAL Eto	AREA	SLA	MAWA	
50.1	51,454.00	0	**879,076.34**	GALLONS / YEAR

ETWU	ETWU = (Eto x 0.62) x [PF HA/IE)+SLA)]	

DEFINITIONS	
Eto	Reference Evapotranspiration Rate, Based on City designation
LA	Landscaped area
SLA	Special landscaped area WITHIN the landscaped area
P.F.	Plant water use factor- WUCLOS
H.A.	Hydro zone area = Irrigated area
I.E.	Irrigation efficiency. Must exceed 0.71.

VALVE	HYDROZONE	HYDROZONE	WATER USE	PLANT FACTOR	AREA	IE	PFxHA/IE	IRRIGATION
	A	HIGH	HIGH	0.7	0	0.75	0	OVERHEAD
	B	MED	MEDIUM	0.5	4373	0.81	2699.382716	DRIP
	C	LOW	LOW	0.2	8532	0.81	2106.666667	DRIP
	D	VERY LOW	VERY LOW	0.1	36949	0.81	4561.604938	DRIP
	E	POOL AND SPA	HIGH	1	1600	1	1600	NONE
					51,454.00		10,967.65	

TOTALS **ETWU 340,677.28 GALLONS / YEAR**

IN COMPLIANCE

BUENA VISTA NON-RESIDENTIAL

MAWA	MAWA = (ETo) (0.62) [(ETAFx LA) + ((1 –ETAF) x SLA)]			
ETAF	0.45			
ANNUAL Eto	AREA	SLA	MAWA	
50.1	9,590.00	0	**134,079.12**	GALLONS / YEAR

ETWU	ETWU = (Eto x 0.62) x [PF HA/IE)+SLA)]	

DEFINITIONS	
Eto	Reference Evapotranspiration Rate, Based on City designation
LA	Landscaped area
SLA	Special landscaped area WITHIN the landscaped area
P.F.	Plant water use factor- WUCLOS
H.A.	Hydro zone area = Irrigated area
I.E.	Irrigation efficiency. Must exceed 0.71.

VALVE	HYDROZONE	HYDROZONE	WATER USE	PLANT FACTOR	AREA	IE	PFxHA/IE	IRRIGATION
	A	HIGH	HIGH	0.7	0	0.75	0	OVERHEAD
	B	MED	MEDIUM	0.5	1867	0.81	1152.469136	DRIP
	C	LOW	LOW	0.2	2141	0.81	528.6419753	DRIP
	D	VERY LOW	VERY LOW	0.1	5582	0.81	689.1358025	DRIP
	E	WATER FEATURE	HIGH	1	0	1	0	NONE
					9,590.00		2,370.25	

TOTALS **ETWU 73,624.61 GALLONS / YEAR**

IN COMPLIANCE

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HYDROZONE CALCULATION

SCALE N.T.C.

L6.03

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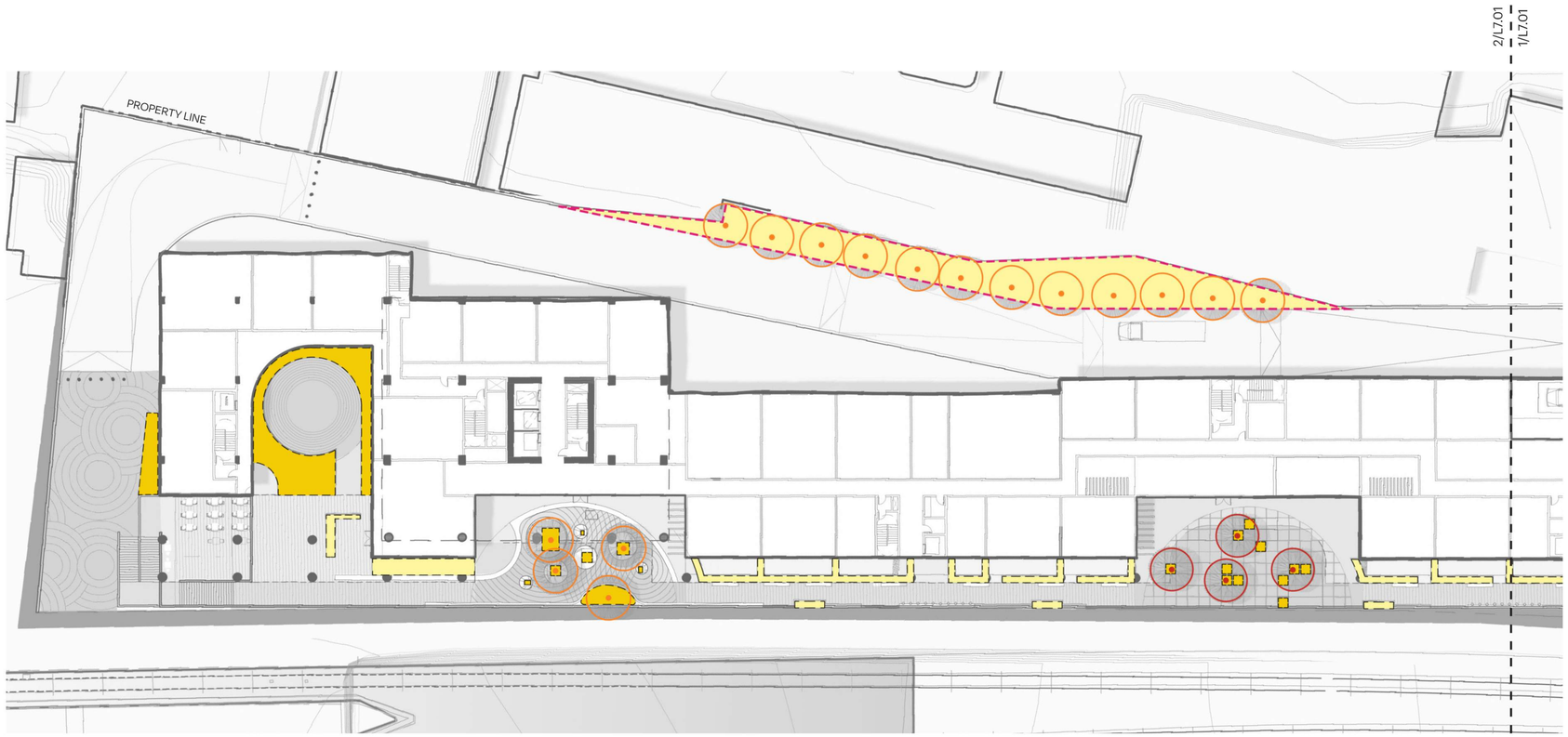
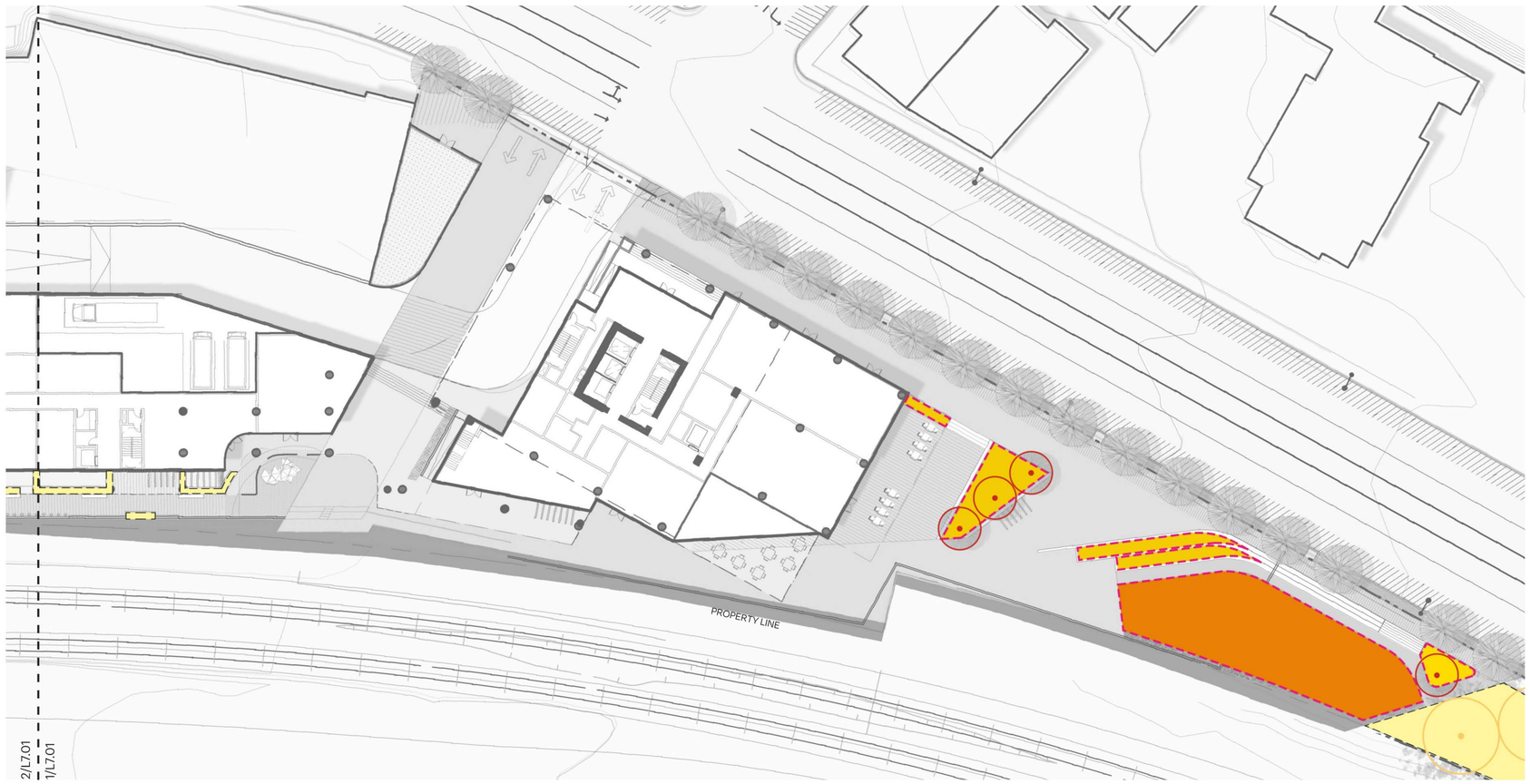
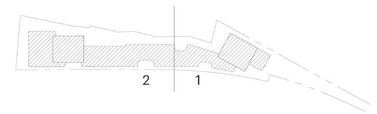




KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



TREE HYDROZONES :

- Medium water
- Low water
- Very low water

SHRUB AND GRASS HYDROZONES :

- Medium Water - Non-residential
- Low water - Non-residential
- Very low water - Non-residential
- Low water - Residential
- Very low water - Residential

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DRAWING TITLE
SOUTH PARCEL PODIUM - HYDROZONE PLAN

SCALE 1" = 20'

DRAWING NO.
L7.01

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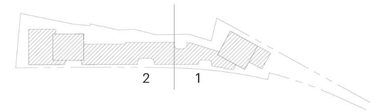
KEYPLAN: SITE
1" = 500'



KEYPLAN: SOUTH PARCEL
1" = 200'



TREE HYDROZONES :

- Medium water
- Low water

SHRUB AND GRASS HYDROZONES :

- Low water - Residential

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ISSUE		DATE
	ENTITLEMENT	07/01/2024

Drawing Title: SOUTH PARCEL LEVEL 5 - HYDROZONE PLAN

SCALE: 1" = 20'

Drawing No.: L7.02

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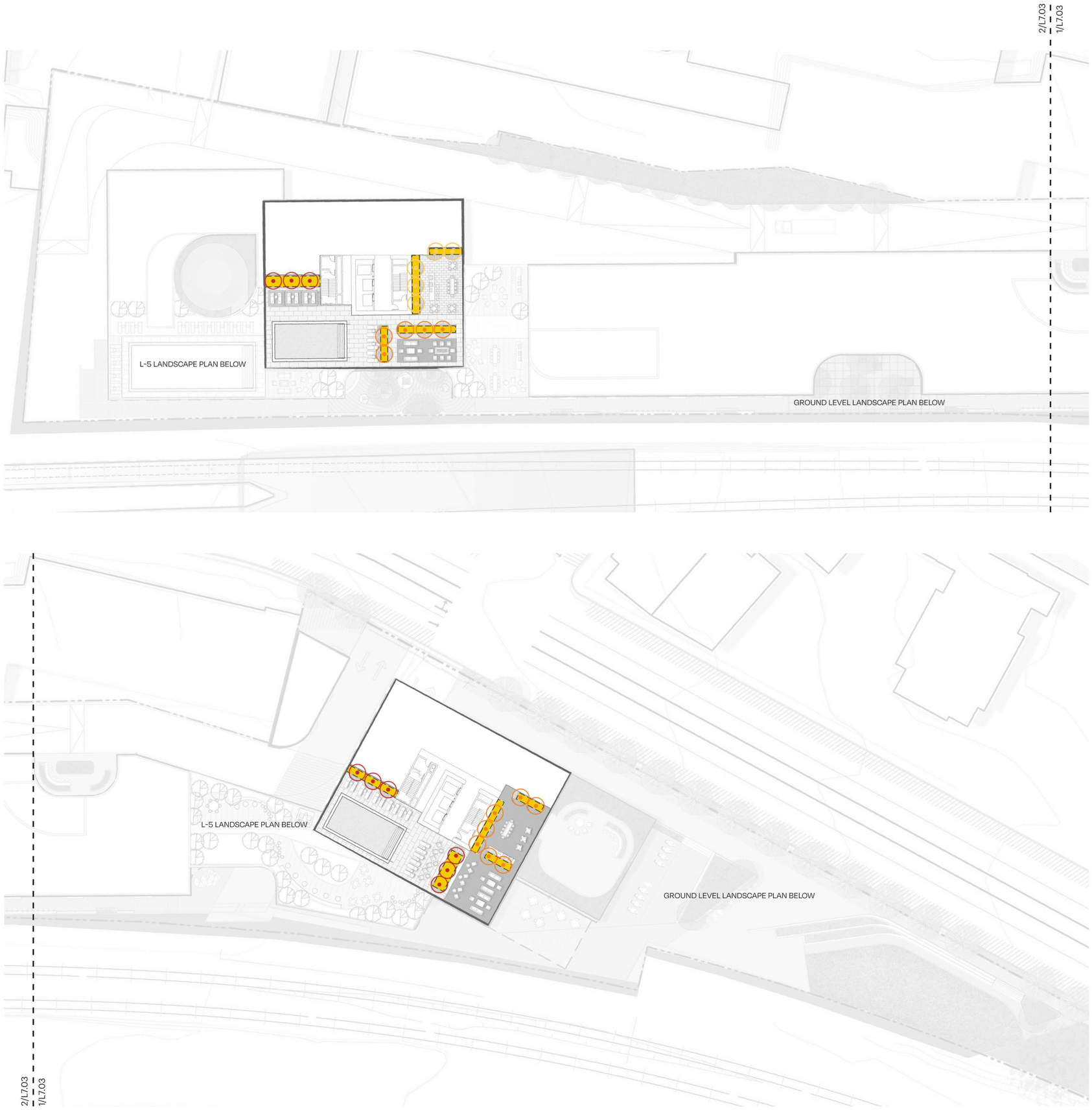

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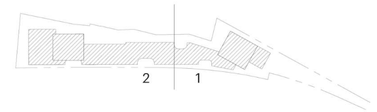
KEYPLAN: SOUTH PARCEL
1" = 200'



TREE HYDROZONES :

- Medium water
- Low water
- Very low water

SHRUB AND GRASS HYDROZONES :

- Low water - Residential

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SOUTH PARCEL ROOF - HYDROZONE PLAN

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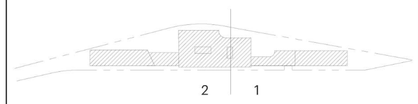
KEYPLAN: NORTH PARCEL
1" = 200'



TREE HYDROZONES :

- Medium water
- Low water
- Very low water

SHRUB AND GRASS HYDROZONES :

- Medium Water - Non-residential
- Low water - Non-residential
- Very low water - Non-residential
- Medium Water - Residential
- Low water - Residential
- Very low water - Residential

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Drawing Title:
NORTH PARCEL
PODIUM -
HYDROZONE PLAN

Date:

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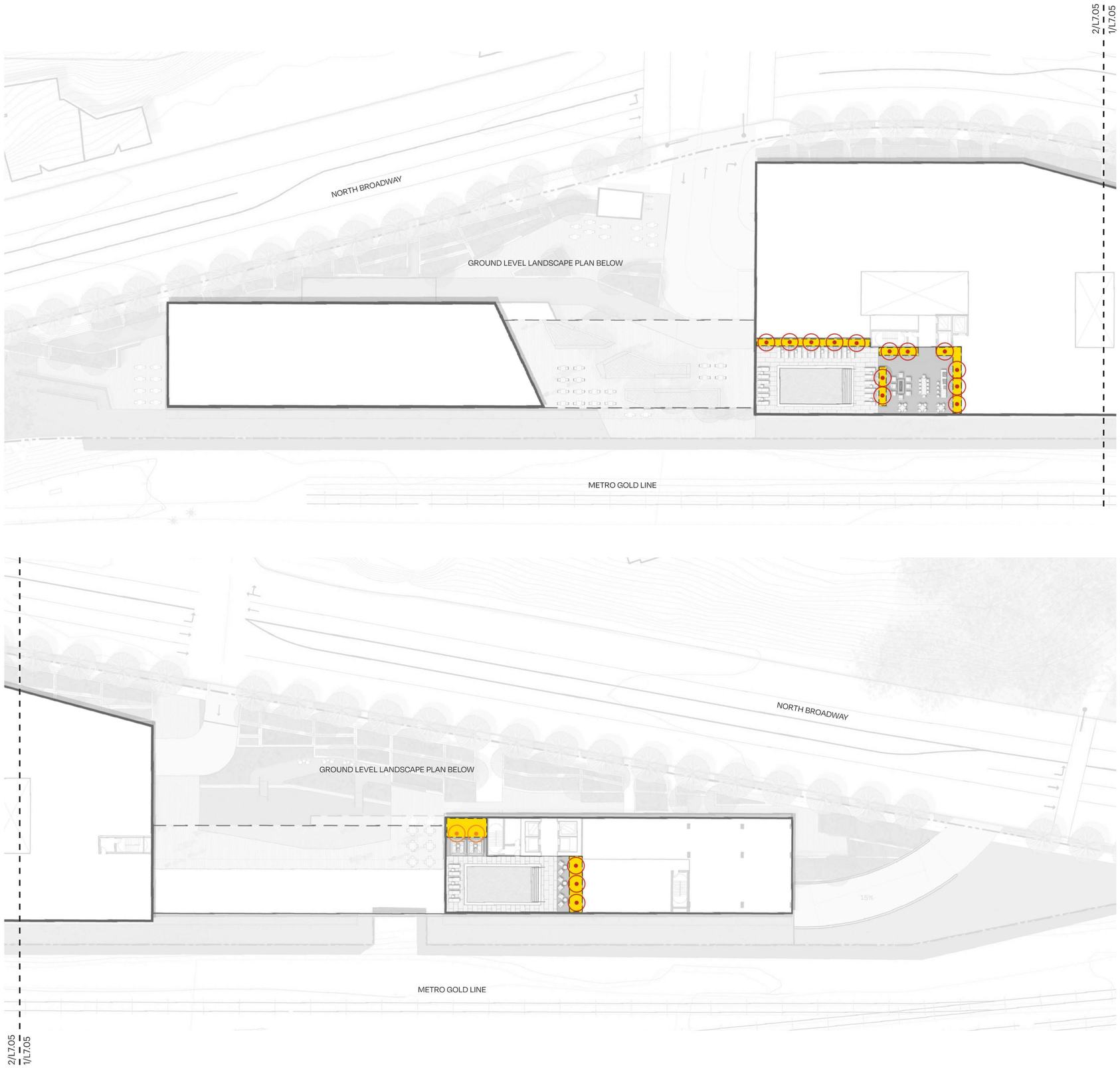

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KEYPLAN: NORTH PARCEL
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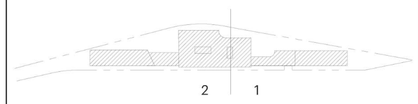

TREE HYDROZONES :

- Medium water
- Low water

SHRUB AND GRASS HYDROZONES :

- Low water - Residential

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NORTH PARCEL TERRACES - HYDROZONE PLAN

SCALE 1" = 20'

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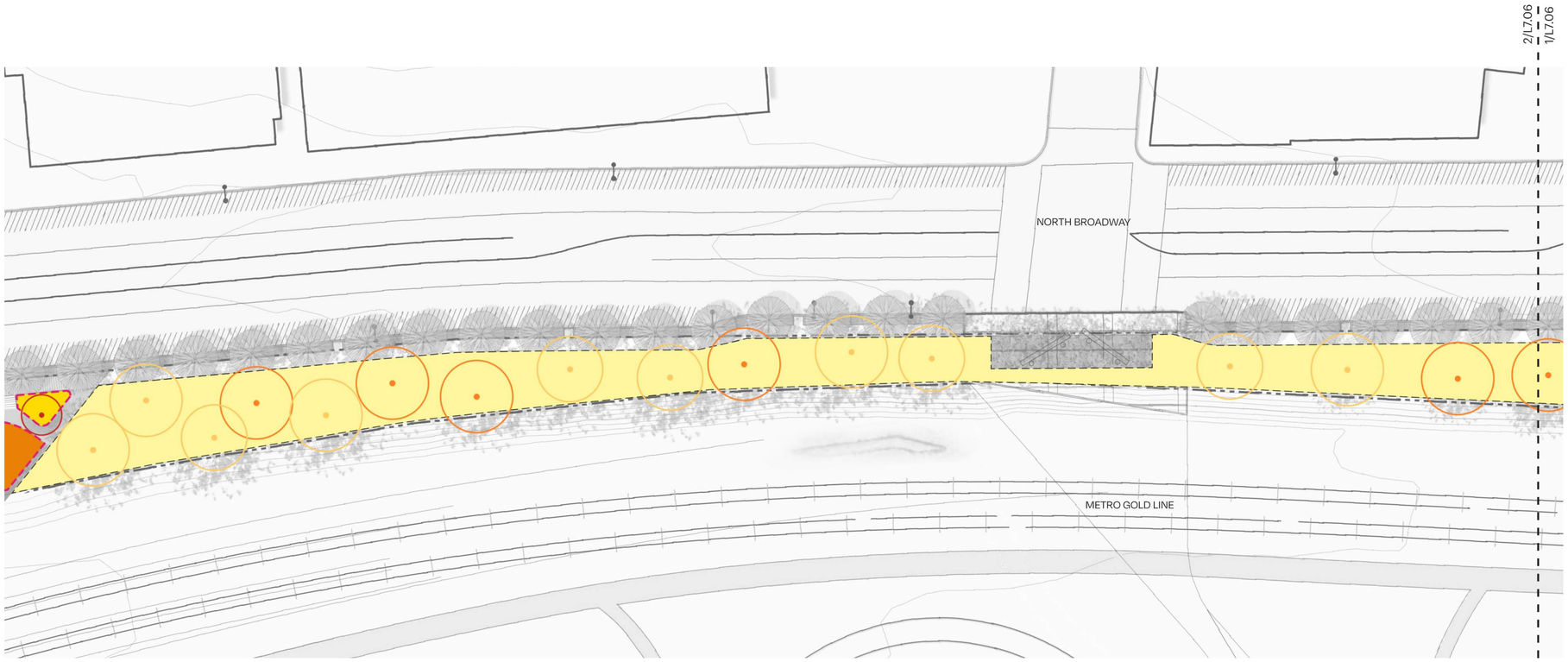



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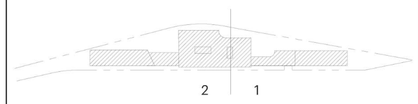

TREE HYDROZONES :

- Medium water
- Low water
- Very low water

SHRUB AND GRASS HYDROZONES :

- Medium Water - Non-residential
- Low water - Non-residential
- Very low water - Non-residential
- Very low water - Residential

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DRAWING TITLE
CENTRAL GREENSPACE - HYDROZONE PLAN

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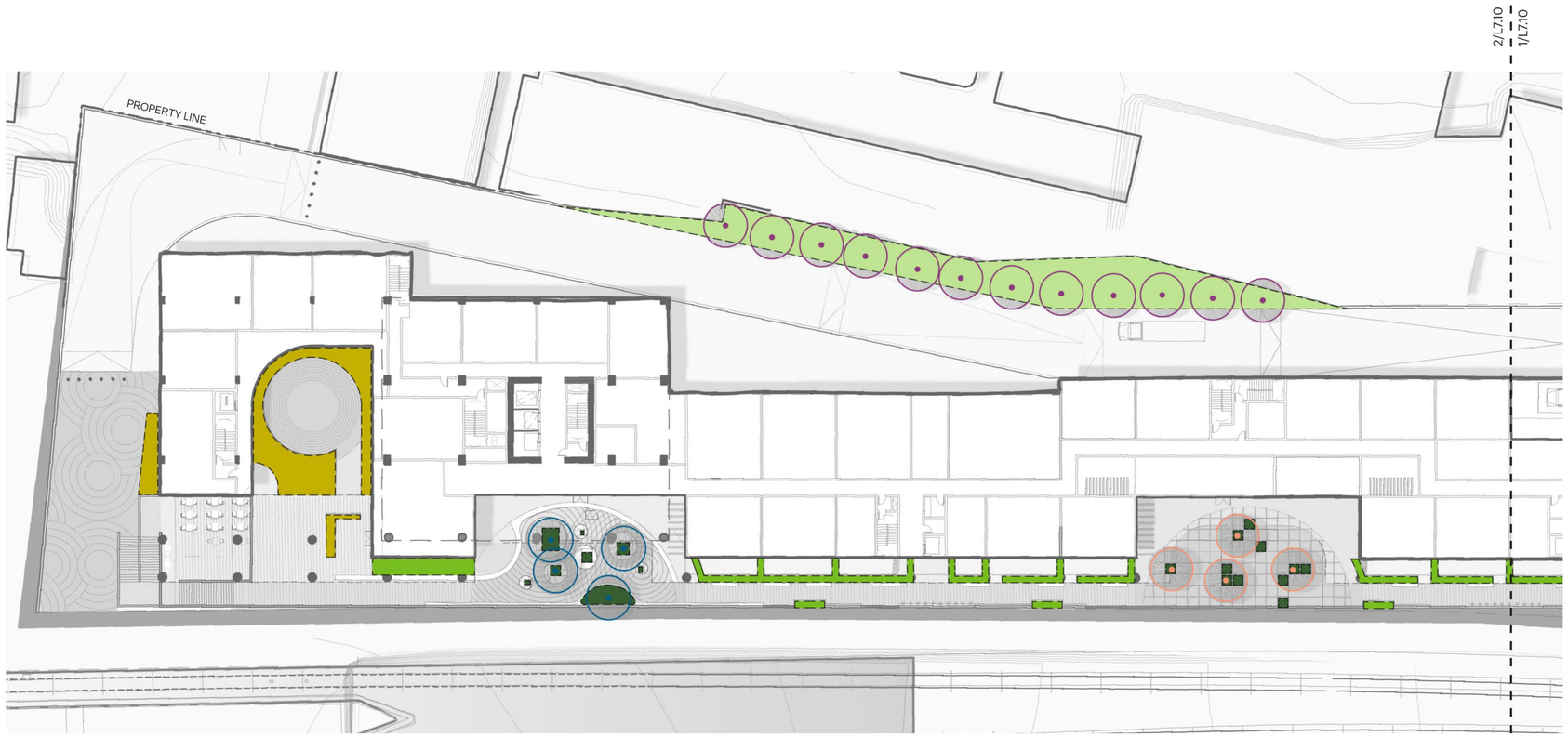

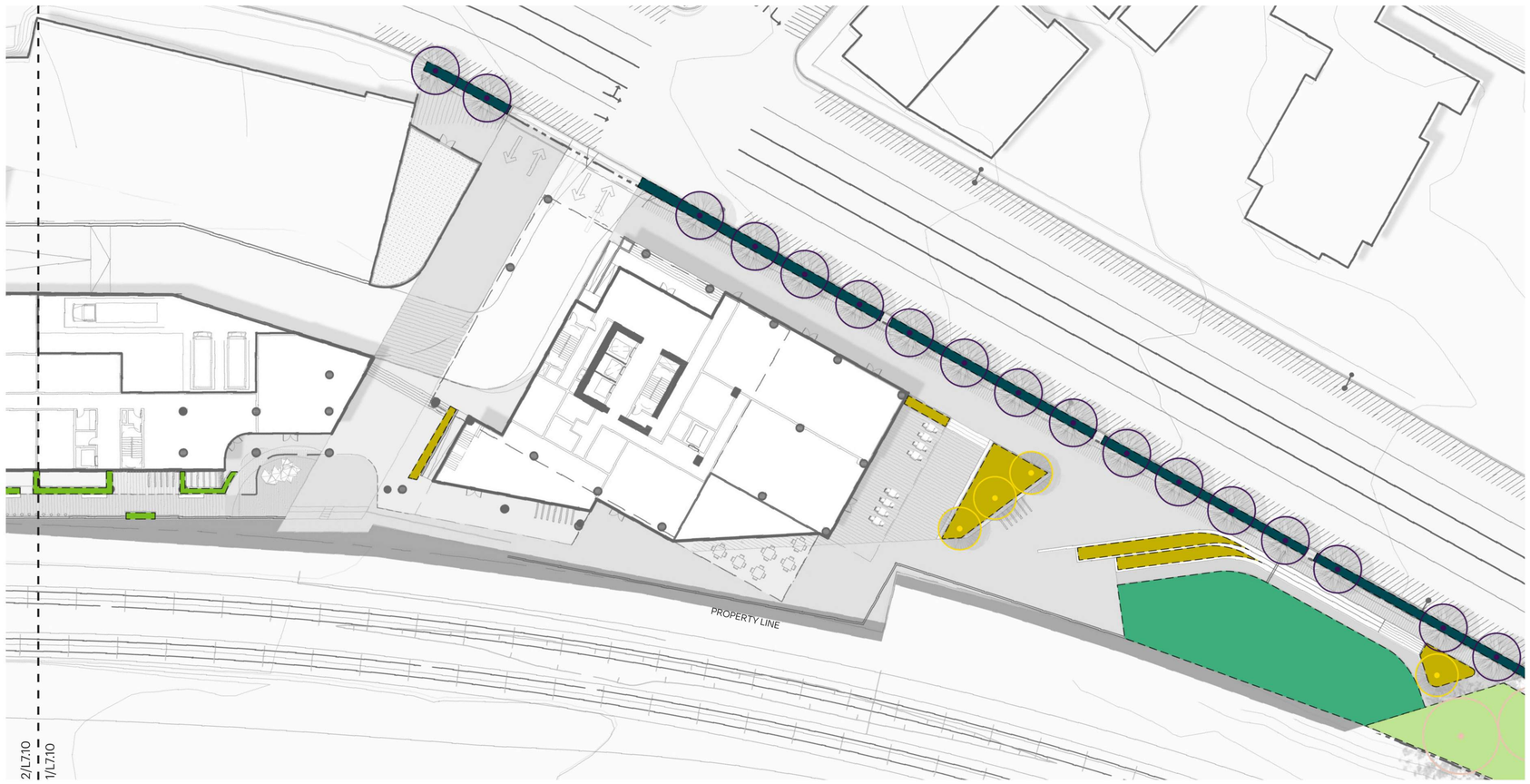

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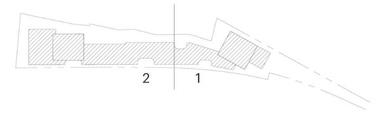

TREE LEGEND :

- Quercus agrifolia
- Arbutus unedo
- Agonis flexulosa
- Koelreuteria Bipinnata
- Ginkgo biloba
- Parkinsonia praecox

PLANT MIX LEGEND :

- Mix SP-01: Arrival Plazas
- Mix SP-02: Scenic Broadwalk
- Mix SP-03: Activity Spaces
- Mix SW-01: Sidewalk
- Mix CG-01: Central Green Space

LAWN LEGEND :

- Delta Grassland Mix™

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DRAWING TITLE
SOUTH PARCEL PODIUM - PLANTING PLAN

SCALE
1" = 20'

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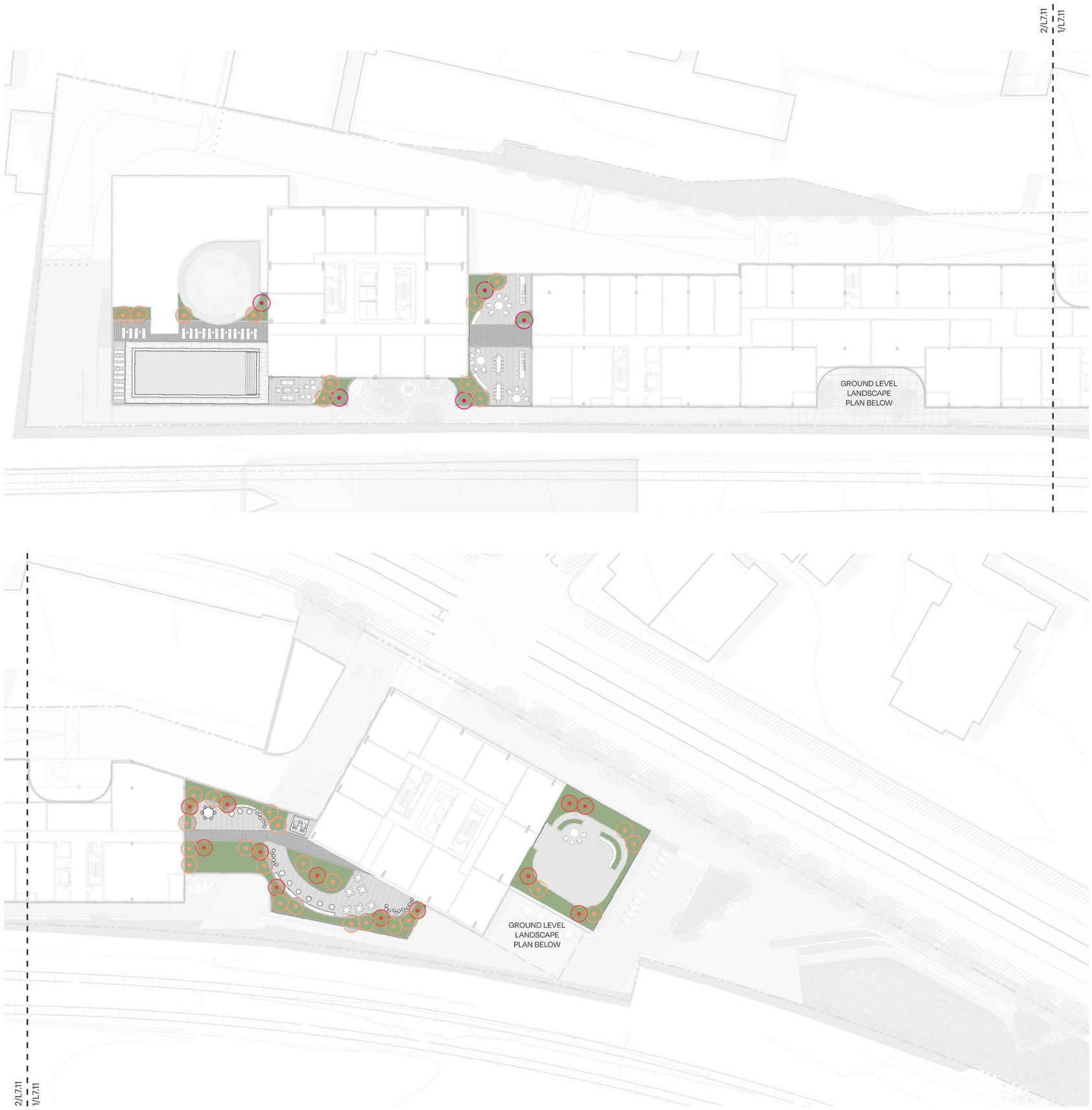

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KEYPLAN: SOUTH PARCEL
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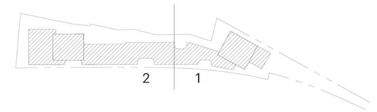

TREE LEGEND :

- Erythrina coralloides
- Cercis canadensis
- Koelreuteria Bipinnata
- Lyonothamnus floribundus

PLANT MIX LEGEND :

- Mix SP-04: Level 5 Podium

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Drawing Title:
SOUTH PARCEL
LEVEL 5 -
PLANTING PLAN

Scale: 1" = 20'

Drawing No.
L7.11

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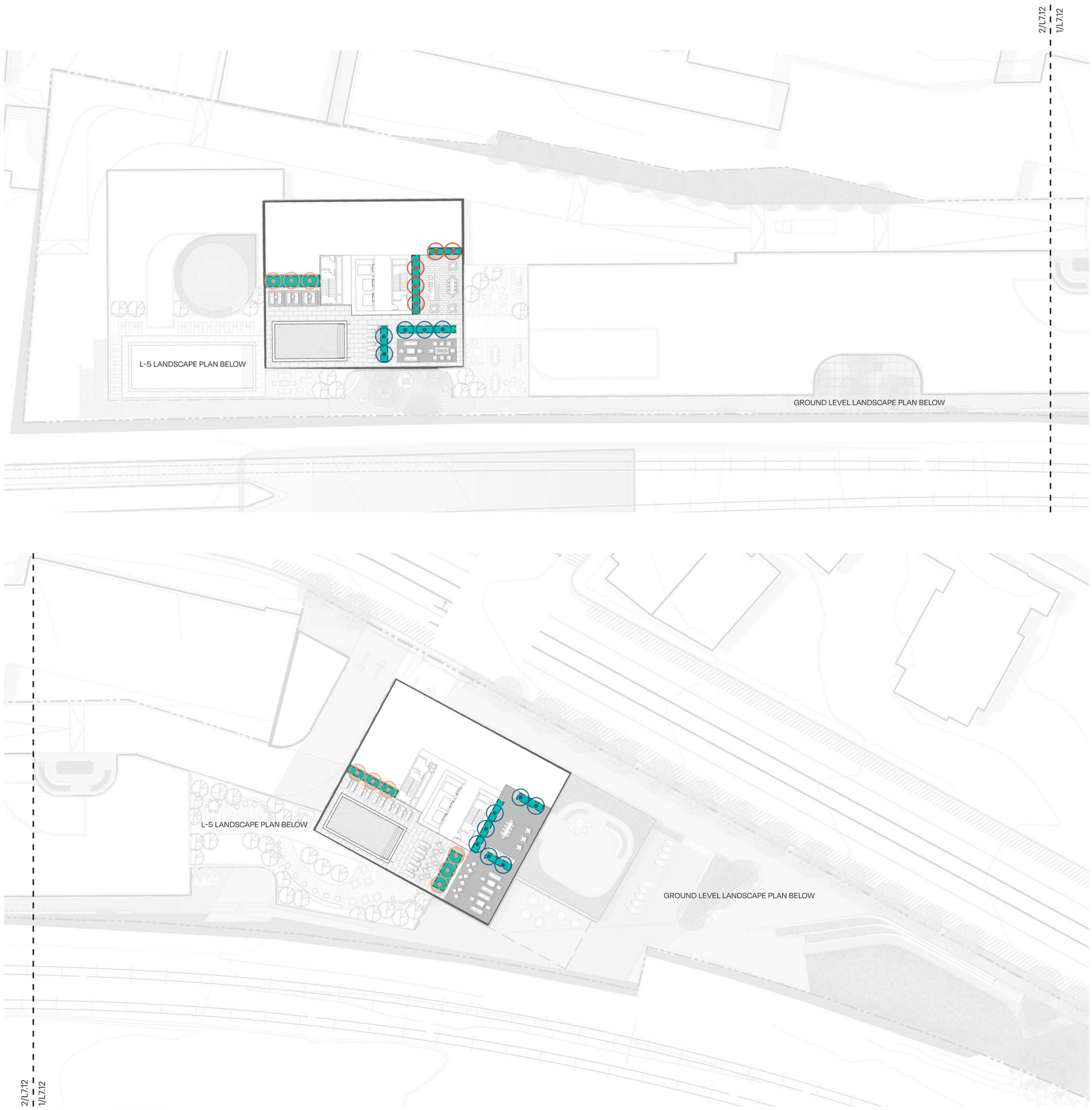

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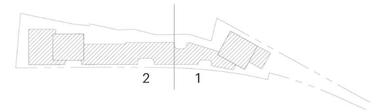
KEYPLAN: SOUTH PARCEL
1" = 200'



TREE LEGEND :

- Arbutus unedo
- Chilopsis linearis
- Cercis canadensis

PLANT MIX LEGEND :

- Mix SP-05: Rooftop

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SOUTH PARCEL ROOF - PLANTING PLAN

SCALE: 1" = 20'

Drawing No. **L7.12**

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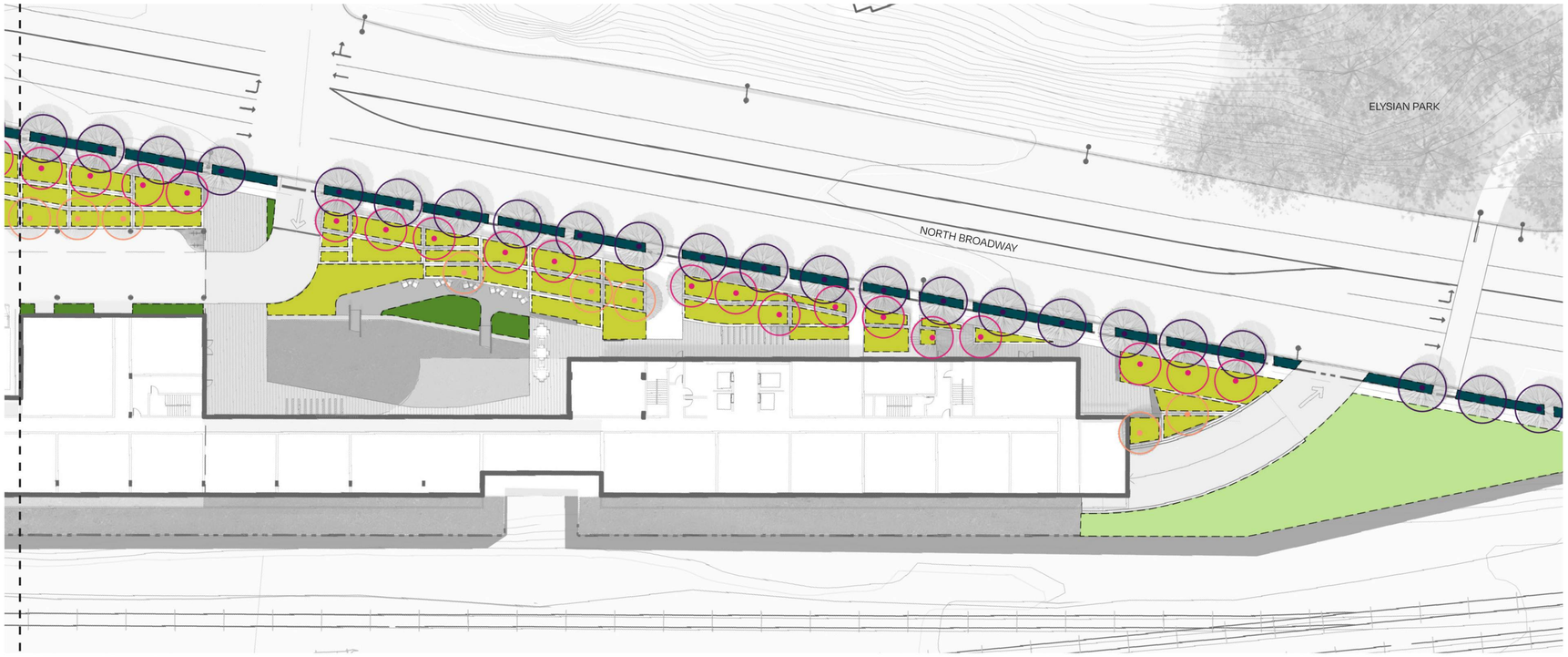

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KEYPLAN: NORTH PARCEL
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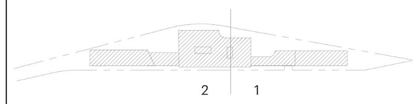

TREE LEGEND :

- Quercus agrifolia
- Arbutus unedo
- Lyonothamnus floribundus
- Koelreuteria Bipinnata
- Parkinsonia praecox

PLANT MIX LEGEND :

- Mix NP-01: Garden Terraces
- Mix NP-02: Rejuvenation Spots
- Mix SW-01: Sidewalk
- Mix CG-01: Central Green Space

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Drawing Title: NORTH PARCEL PODIUM - PLANTING PLAN

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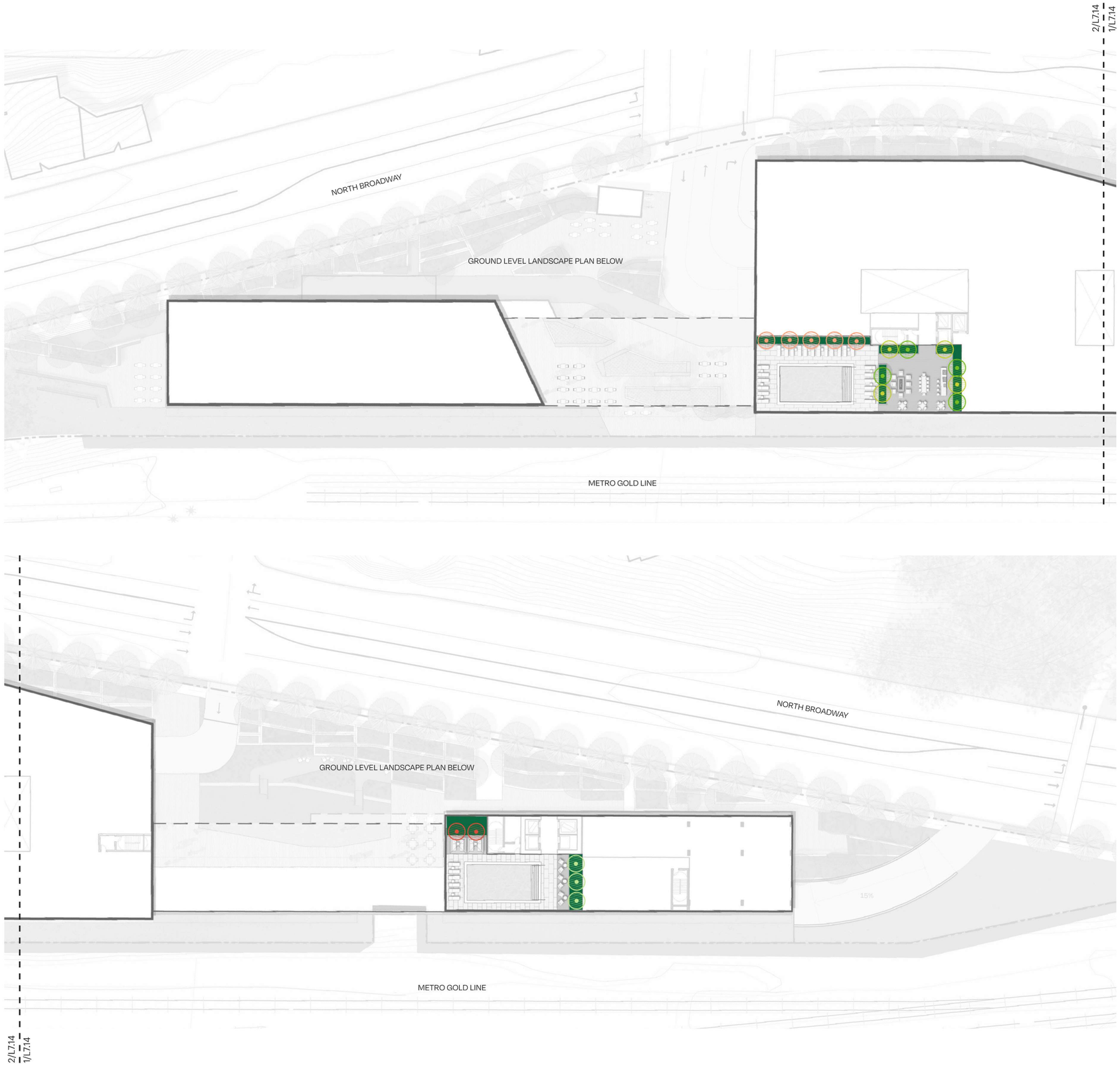

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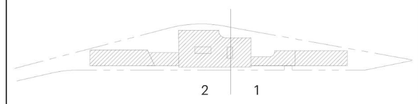

TREE LEGEND :

- Erythrina coralloides
- Cercis canadensis
- Platanus racemosa
- Citrus limon
- Diospyros texana

PLANT MIX LEGEND :

- Mix NP-03: Rooftop

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Drawing Title
NORTH PARCEL TERRACES - PLANTING PLAN

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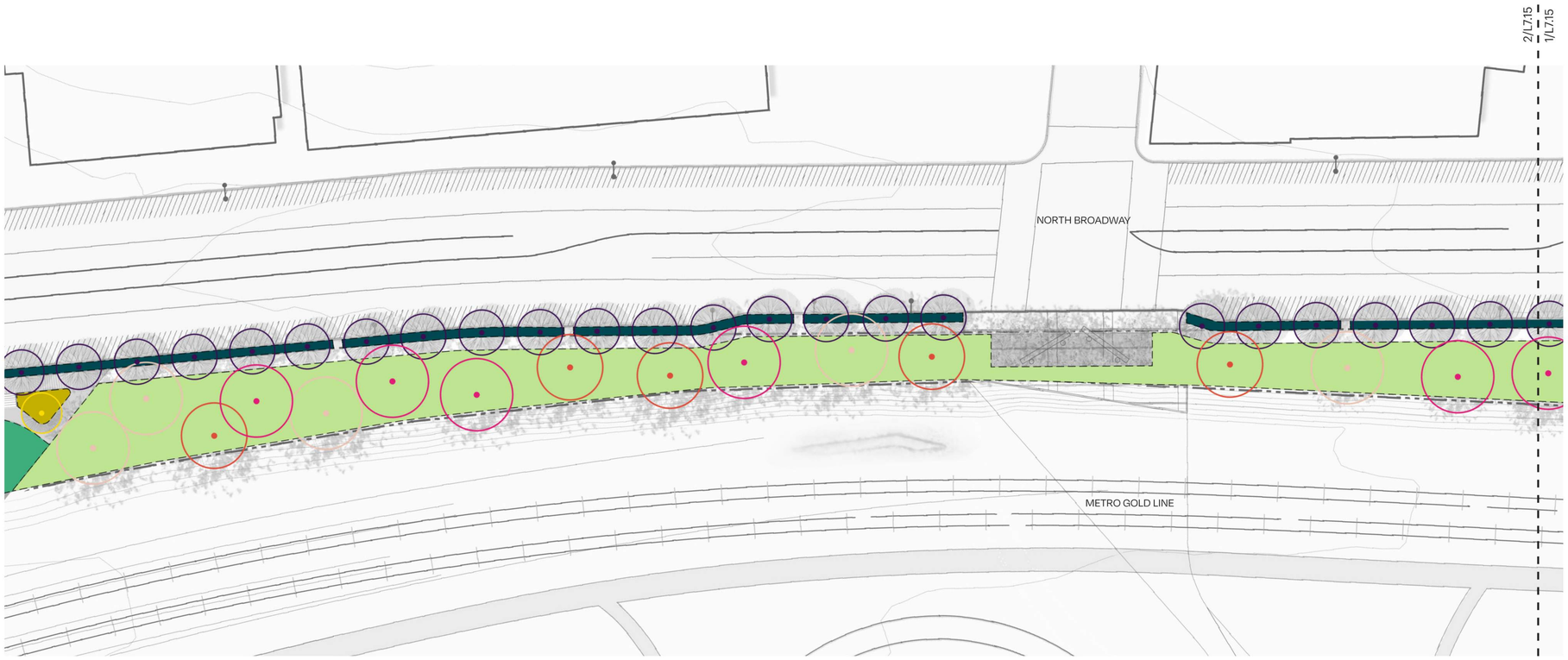



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KEYPLAN: NORTH PARCEL
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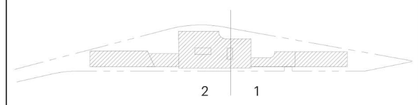

TREE LEGEND :

- Quercus agrifolia
- Parkinsonia praecox
- Lyonothammus floribundus
- Chilopsis linearis
- Ginkgo biloba
- Koelreuteria Bipinnata

PLANT MIX LEGEND :

- Mix SW-01: Sidewalk
- Mix CG-01: Central Green Space
- Mix SP-03: Activity Spaces
- Mix NP-02: Rejuvenation Spots

LAWN LEGEND:

- Delta Grassland Mix™

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CENTRAL GREENSPACE - PLANTING PLAN

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Appendix C.2

Cultural Resource Assessment

Cultural Resource Evaluation and Impact Assessment for the Buena Vista Project, City of Los Angeles, California

Karen K. Swope, Jennie O. Sturm, Patrick Stanton, Joseph J. El Adli, and Joy L. Vyhmeister



Technical Report 22-43
Statistical Research, Inc.
Redlands, California

Cultural Resource Evaluation and Impact Assessment for the Buena Vista Project, City of Los Angeles, California

Karen K. Swope, Jennie O. Sturm, Patrick Stanton, Joseph J. El Adli, and Joy L. Vyhmeister



Technical Report 22-43
Statistical Research, Inc.
Redlands, California

Revised June 2025

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Introduction

The Buena Vista Project (the Project) will redevelop an 8.08-acre (3.27-ha) parcel in the City of Los Angeles, Los Angeles County, California (Figure 1). The Project site consists of Assessor's Parcel No. 5414-016-002 and is bounded by North Broadway (previously Buena Vista Street) to the north and west, Spring Street to the south, and the Metro Gold Line right-of-way (ROW) and Los Angeles State Historic Park to the southeast (Figure 2). The Project site currently supports a mix of developed and undeveloped space, with most of the development in the northeastern and southwestern portions of the Project area and little on the steep slope in between. The developed areas contain an assortment of buildings and foundations and a limited number of standing features.

Statistical Research, Inc. (SRI), conducted cultural resource studies and ground-penetrating radar (GPR) assessments targeting selected potentially buried cultural resources for the Project; together, the investigations assessed potential impacts of the Project on cultural resources that might be present on the property. This study builds on previous work by SRI (Becker 2025) and Historic Resources Group (HRG 2025) in support of the Project. This report briefly describes the Project and the Project personnel and their qualifications, discusses the environmental setting and culture history of the Project area and the applicable cultural resource regulations, and outlines the methods and results of the cultural resource studies and ground-penetrating radar assessments, followed by the conclusions. Finally, a recommended mitigation measure is provided that would reduce the potential impact to cultural resources to a less-than-significant level. The buried-sites-sensitivity assessment is provided in Appendix A, the GPR assessment is presented in Appendix B, and Appendix C contains the letter report on the results of archaeological test excavations and an additional GPR assessment. Appendix D contains Native American Heritage Commission (NAHC) correspondence related to the Sacred Lands File (SLF) search request submitted by SRI in April 2022. Confidential Appendix E contains the project cultural resources records search, and Confidential Appendix F contains the California Department of Parks and Recreation (DPR) 523-series forms for cultural resources recorded during this investigation.

Project Description

The Project is a mixed-use residential and commercial development consisting of up to approximately 1,090,125 square feet of residential floor area (986 dwelling units [du]); 15,000 square feet of neighborhood-serving retail uses; 23,800 square feet of indoor and outdoor restaurant uses; and 116,610 square feet of outdoor public trellis/balcony space. As part of the proposed Project, approximately 0.21 acres of the 8.08-acre Project site would be dedicated to the City of Los Angeles as public ROW along North Broadway. The total net area of the site after the dedication would be 7.87 acres (3.18 ha, or 342,678 square feet [sf]).

The Project includes up to approximately 1,128,926 sf of floor area, resulting in a Floor Area Ratio (FAR) of 3.63:1.

The Project involves subdivision of the site into "South Parcel" and "North Parcel" master lots and airspace lots for residential and commercial purposes.

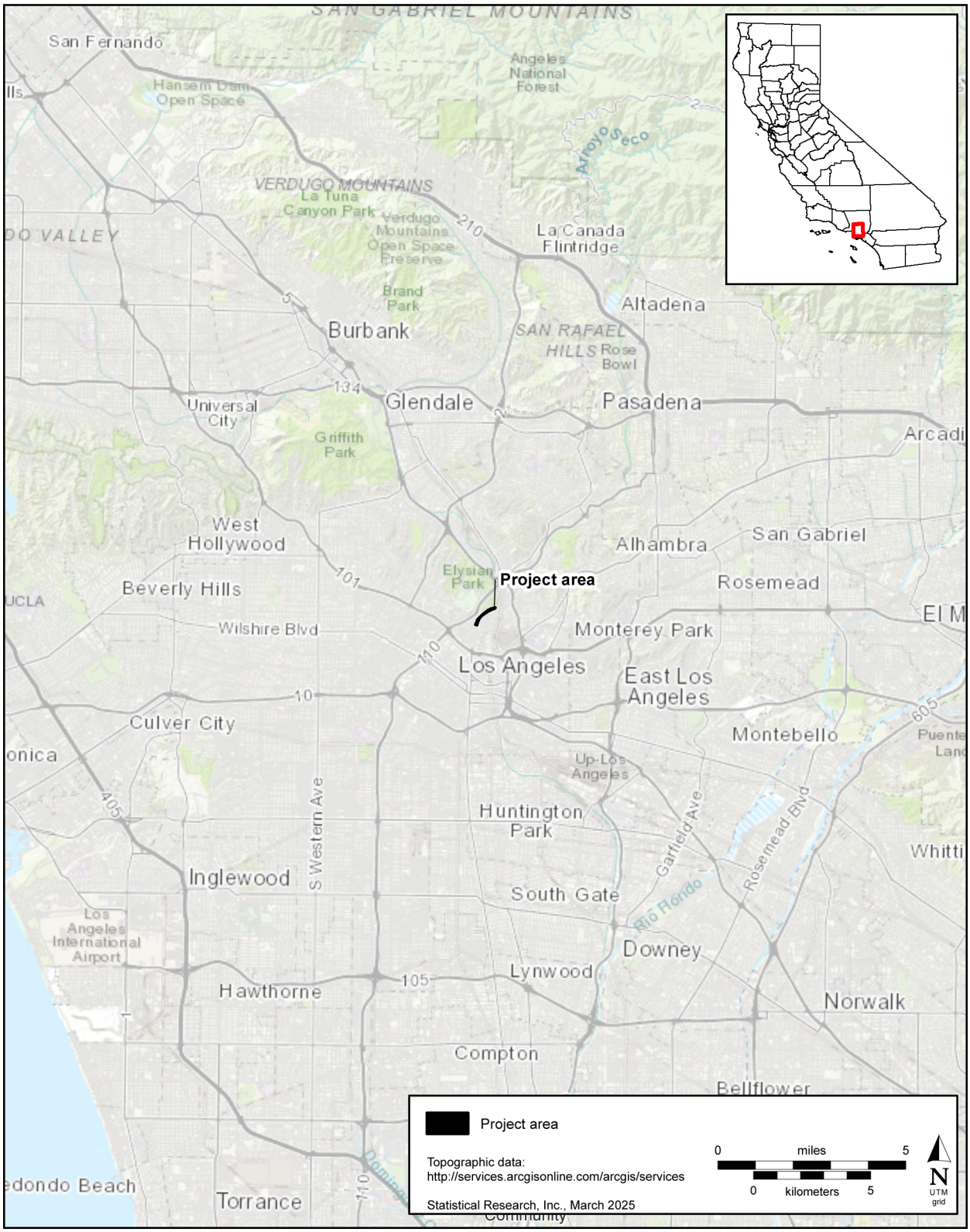

Figure 1. Vicinity map of the Project area.

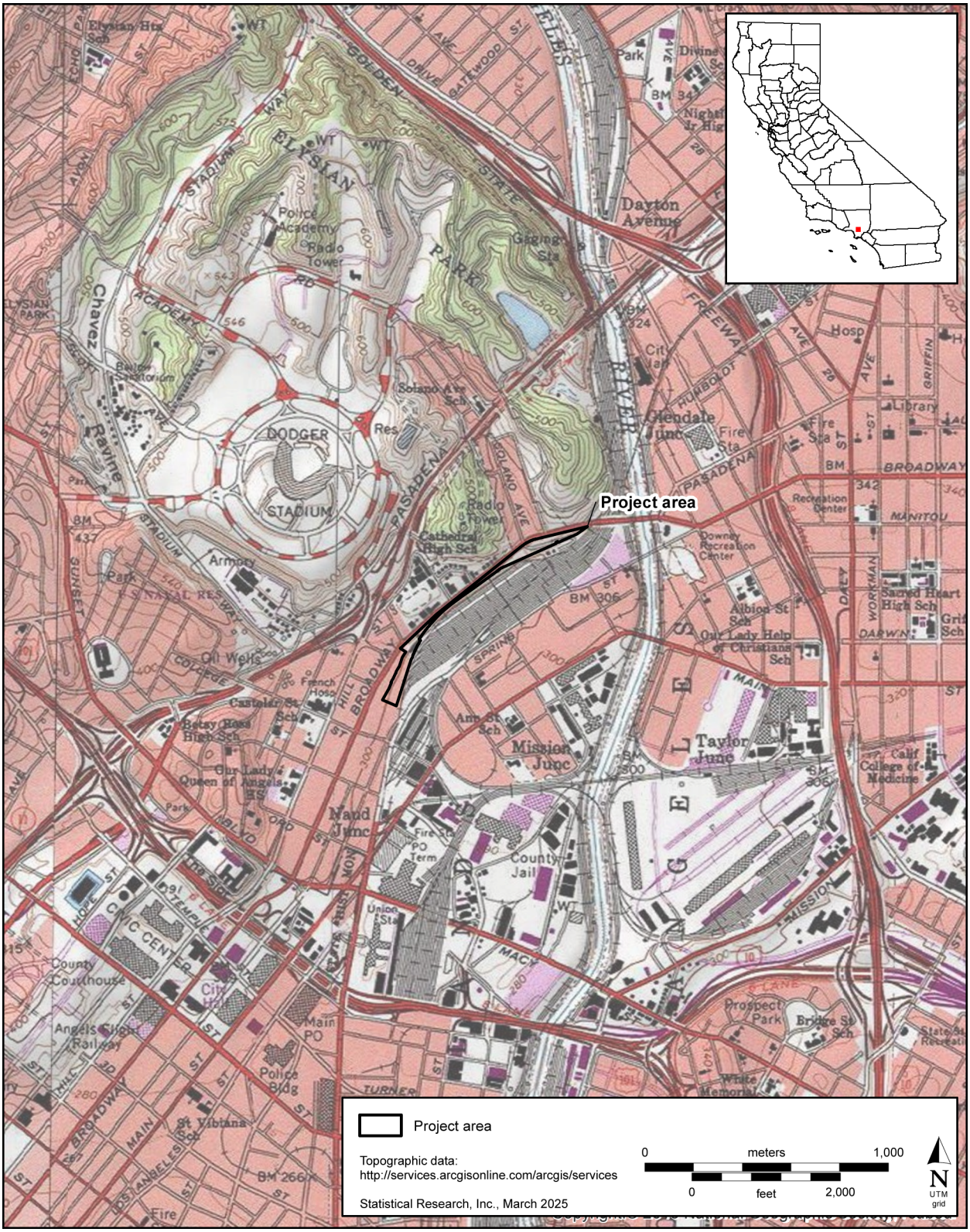

Figure 2. Location map of the Project area.

The South Parcel would include 631 du and 25,800 gsf of restaurant/retail space with three levels of parking garage below grade from North Broadway. Built upon the parking garage at the elevation of North Broadway are the six-story (105-foot- high) Podium; the 26-story (343'-8" high) Building 1; and the 22-story (301-foot-high) Building 2. The South Parcel includes approximately 81,465 sf of common open space, which includes 34,967 sf (2,808.7 m^2) available to the public.

The North Parcel would include 355 du and 13,000 gsf of restaurant/retail space with three levels of parking garage located below grade from North Broadway. Built upon the parking garage at the elevation of North Broadway are the three-story (72'-4"- high) Retail Block; the six-story (108'-8"- high) Courtyard Building; the 15-story (209'-4"- high) North Building; and the two-story (56'-4" high) Podium. The North Parcel includes approximately 48,784 sf of common open space, which includes 10,410 sf available to the public.

The Project will require demolition of existing buildings, demolition or relocation of existing structures, and removal of existing trees. Underground parking structures are planned for both the North and South Parcels and will require excavation. The potential impact to cultural resources of these demolition, removal, and excavation activities are the focus of this report.

Project Personnel and Qualifications

The following SRI staff performed the research, survey, and analysis reported in this document. Donn R. Grenda, Ph.D., is co-owner and principal of SRI and a Registered Professional Archaeologist (RPA) who meets the Secretary of the Interior's Professional Qualifications Standards in Archeology. Karen K. Swope, Ph.D., RPA, is a historical archaeologist and meets the Secretary of the Interior's Professional Qualifications Standards in Archeology and History. Joseph J. El Adli, Ph.D., who completed the buried-sites-sensitivity assessment, is a qualified paleontologist and geologist meeting the Society of Vertebrate Paleontology criteria for a Project Paleontologist/Principal Investigator. Jennie O. Sturm, Ph.D., RPA, is SRI's geophysics program director. Kenneth Becker, M.A., RPA, and Patrick Stanton, M.A., RPA, completed the pedestrian-survey component of the Project. Joy L. Vyhmeister, M.A., RPA, authored portions of the cultural resource report.

Cultural Resource Study: Background

Environmental Setting

The City of Los Angeles is a sprawling, 1,295-km (500-square-mile) municipality in southern California encompassing portions of the San Fernando Valley, the Los Angeles Basin, and a corridor connecting to the Port of Los Angeles in San Pedro. Several independent cities and unincorporated sections of Los Angeles County are located within the larger boundaries of the City of Los Angeles, including the Cities of Santa Monica, Culver City, and Beverly Hills. The Project site is located northeast of downtown Los Angeles, within the Chinatown neighborhood. It is surrounded by a mix of development, including residential, commercial, and industrial zones, and is less than 1.6 km (1 mile) from several freeways. The Los Angeles River is located to the east, where it runs in a north–south channel.

The Project site is on the U.S. Geological Survey 7.5-minute Los Angeles, California, topographic quadrangle, on Public Land Survey System area, Section 22 of Township 1 South, Range 13 West (see Figure 2). The elevation within the Project area varies from 89 to 106 m (291 to 348 feet) above mean sea level and is generally highest adjacent to North Broadway, sloping down to the Metro Gold Line ROW.

A geotechnical investigation previously conducted for the Project (Geotechnologies 2025) identified the Project area as part of the Elysian Park Hills, which are composed primarily of upper Miocene- and

Pliocene-age sedimentary rock. The Project area itself is underlain by the upper Puente Formation, which is composed of well-bedded siltstone, clayey siltstone, and sandstone.

The Project area is within a highly developed area of the City of Los Angeles and does not reflect a natural setting. The flora is limited to species that can survive in a heavily disturbed urban environment and consists primarily of introduced grasses that cover the open hillslope in the central Project area. A number of mature palm trees are present. The fauna within the Project area is similarly limited to species that can adapt to an urban setting. These include raptors, smaller birds, rodents, raccoons, coyotes, skunks, and reptiles.

Culture History

Los Angeles has a long cultural history that includes Native American groups, Spanish explorers and settlers, other Euroamericans, Mexicans, and Americans. The prehistory of the Los Angeles area is summarized below. The historical period is also briefly discussed, with an emphasis on known land uses within the Project area. Much of this information is drawn from the historic-context sections of previous reports supporting the Project (Becker 2025; HRG 2025) and information available in the Los Angeles Citywide Historic Context Statement (City of Los Angeles 2020).

Prehistoric Context

Paleoindian Period

Roughly 12,000 years ago, southern California was populated by several related yet distinct cultural groups, generally known as Paleoindians (Moratto 2004:76). Along the coast, these cultures are known as the Paleocoastal tradition and are believed to have migrated down the coast from northern California. The people of the Paleocoastal tradition are thought to have been the first to arrive in California (Erlandson et al. 2007), and the tradition is well documented along the coast of central California and on the northern Channel Islands (see Erlandson et al. 2007). People of the Paleocoastal tradition were adapted to maritime conditions and collected shellfish, hunted marine and land mammals and birds, and caught fish (Moratto 2004:78). The Paleoindians living farther inland are known as Clovis (from the original sites excavated near Clovis, New Mexico, in the early twentieth century) and were adapted to a terrestrial and lacustrine environment, using a very different subsistence technology from that of the Paleocoastal people. Inland Paleoindian sites generally date to the same time as Paleocoastal sites. Major Clovis localities are known at Lake Tulare (Moratto 2004:76, 78; Riddell and Olsen 1969) and China Lake (Davis 1975), among other locations in central and southern California.

Although there are many regional variants of these groups, Paleoindians can be characterized by a few general traits (from Moratto 2004:76, 78):

1. Paleoindians inhabited interior sites along ancient lake and marsh shorelines and coastal sites along stream channels and estuaries.
2. Paleoindians had a sophisticated lithic technology with advanced toolmaking techniques for the creation of large flaked stone tools, especially large foliate points and lanceolate fluted points.
3. Ground stone tools were not utilized, and groups made use of the atlatl and darts.
4. Paleoindians were primarily nomadic or systematically followed seasonal resources as those became available. Some groups, however, may have been more sedentary if the resources in the area were adequate for permanent settlements.

Millingstone Period

The Millingstone period—sometimes referred to as the Early period—is a roughly 5,500-year span beginning in ca. 6500 cal B.C. and ending with the first dramatic increase in regional human population in ca. 1000 cal B.C. (the "cal" prefix indicates that these dates are derived from calibrated radiocarbon dates). This period

(called a "horizon" in some chronological schemes) is definitive of a time when milling implements (especially manos and metates), scraper planes, choppers, and core tools were abundant and when there was a dearth of projectile points (in this case, dart points and spears) and faunal remains. Large, side-notched projectile points were frequently used during the Millingstone period and cogged stones and discoidals are present, whereas mortars and pestles are notably absent. Inherent in the definition of the Millingstone period is a heavy dependence on seeds and a minor emphasis on hunting (hence the abundance of milling implements and the near absence of hunting equipment and faunal remains).

Sutton (2009) has argued that from the end of the Millingstone period (ca. 1500 B.C.) through the early Intermediate period (ending ca. A.D. 500), there was an initial entry of Takic (a proto-Gabrielino/Cupan branch of the Uto-Aztecan language family) speakers into the region. These Takic groups appear to have replaced the existing late Millingstone period groups along the coast. The archaeological record reflects this major change. First, ancestral DNA and osteometric (bone-morphology and -measurement) studies of the small number of skeletal remains available from this period indicate that the entering Takic groups were biologically distinct from the preceding populations (for a full discussion, see Sutton 2009), suggesting that a migration took place. Second, significant increases in site numbers were noted in some areas, suggesting the arrival of incoming groups during the early Intermediate period—earlier than has been traditionally thought. Also, larger sites with greater diversities of artifacts appeared at about that time, but they seem to have been occupied on a seasonal basis. Third, there were some changes in mortuary patterns on the coast. Flexed burial under cairns, a common burial practice throughout the Millingstone period, disappeared from the coast but continued inland; cremation was uncommon and was not a marker of the early Takic expansion, as is commonly believed (see Sutton 2009). Large mourning features with cremated human bone appeared in about 600 cal B.C., during the early Intermediate period. These features apparently represent a diffusion of ideas from Yuman groups in the deserts to the east and may mark the inauguration of some sort of ritual complex in the region.

Intermediate Period

The Intermediate period, dating from 1000 cal B.C. to cal A.D. 1000, is marked by changes in settlement patterns, economic activities, mortuary practices, and technology. The latter portion of the Intermediate period, ca. A.D. 500–1000, is marked by the spread of the bow and arrow to the coast from the north and east. Artifacts commonly present at archaeological sites from the Intermediate period include both dart points and spear points as well as arrow points (commonly Cottonwood Triangular and Desert Side-notched varieties), manos and metates, and mortars and pestles. Sometime toward the end of the Intermediate period, the trade in obsidian mined from the Coso Formation decreased dramatically (Sutton et al. 2007:244), and Obsidian Butte obsidian increased in importance. Yuman ceramics, plus some local wares, were present. Major settlements continued to be occupied on a seasonal basis. Flexed burial continued, and cremation remained uncommon. As discussed above, Sutton (2009) argued that a major process beginning in the late Intermediate period was the diffusion of a Takic language, the mother of the Cupan languages, into Yuman-speaking areas immediately to the south of the Los Angeles Basin.

Late Period

The Late period, beginning in ca. cal. A.D. 1000 and ending with European contact in A.D. 1542, witnessed extensive population growth along much of the southern California coast. There are more sites and a greater variety of sites with greater internal differentiation from this period than from any other time in prehistory. Villages with complex site layouts and burial grounds with highly variable mortuary treatments appeared, suggesting the development of social differentiation (Douglass et al. 2016:44). Many of the artifact types from the preceding period persist into the Late period. Diagnostic artifacts of this period include small, triangular projectile points, mortars and pestles, steatite containers, circular shell fishhooks, various bone tools, and a variety of ornaments made of bone, shell, steatite, and other materials. Pottery becomes more common during this period and is commonly Colorado Buff and Tizon Brown.

Protohistoric and Early Historical Periods

The line between the Late and Protohistoric periods is admittedly arbitrary. The Protohistoric period in the Los Angeles Basin began with initial European contact in A.D. 1542 and ended with the establishment of Mission San Gabriel del Arcángel in 1771, after which direct and recurrent contact between the Gabrielino/Tongva and the Spanish settlers in the Los Angeles Basin was established (King 1978). The early historical period (also known as the Mission period) runs from 1771 until the beginning of the era of secularization in 1834.

The Protohistoric period is possibly the least-well-documented period in the southern California occupational sequence. A distinct time bias against remains from this period is evident in the work of some early archaeologists who excavated in pursuit of the very earliest, Paleoindian, deposits and disregarded later components. In addition, if sites were multicomponent and were occupied during the Protohistoric period as well as either the Late or Mission period, it is possible that the Protohistoric period component may have been difficult to identify and distinguish from components of other time periods.

The Gabrielino/Tongva

The Gabrielino/Tongva occupied much of present-day Orange and Los Angeles Counties as well as Santa Catalina, San Clemente, and San Nicolas Islands and portions of Riverside and San Bernardino Counties, with territory including "the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers, several smaller intermittent streams in the Santa Monica and Santa Ana Mountains, all of the Los Angeles Basin, [and] the coast from Aliso Creek to Topanga Creek in the north" (Bean and Smith 1978:538). As previously mentioned, early ancestors of the Gabrielino/Tongva arrived in this area of southern California at the end of the Millingstone period, in ca. 1500 B.C., through the early Intermediate period (ending in ca. A.D. 500), with the initial entry of Takic-language speakers into the region.

At the time of contact and for many years thereafter, the Gabrielino/Tongva engaged in an intensive hunter-gatherer lifestyle and exploited a wide range of plant and animal resources, such as acorns, deer, yucca, and cacti in the interior of their territory and a wealth of fish and shellfish species associated with the southern California kelp beds and coastline (Bean and Smith 1978; McCawley 1996). With the arrival of Europeans and the expansion of the California mission system, however, pressure from Europeans to turn aside traditional lifeways to work at the various ranchos and missions became too great. By 1800, most of the Gabrielino/Tongva had become missionized, and many had died from violence, imported illness (e.g., smallpox), or illness associated with the cramped mission dormitories (e.g., tuberculosis and dysentery). Those who did not submit to the mission system fled the area to live in remote refuges or work on secular ranches and farms (Bean and Smith 1978:Table 1; Walker and Johnson 1992:127). Many Gabrielino/Tongva still survive, but their numbers are far fewer today than they were at the point of contact.

There were two named Gabrielino/Tongva villages in the immediate vicinity of the Project. The most important of these was Yaangna (sometimes spelled Yanga or Yang-na), a large village in the area of present-day Union Station and City Hall, approximately 985 m (3,232 feet) south-southwest of the Project area. The smaller village of Maungna was in the area of present-day Elysian Park, within the current Los Angeles Police Department Academy grounds, approximately 1,280 m (4,200 feet) north-northwest of the Project area. Generally speaking, Gabrielino/Tongva settlements in the Protohistoric and early historical periods were near reliable rivers, streams, and springs. Both of the nearby villages were within 1.6 km (1 mile) of the historical course of the Los Angeles River.

Historical-Period Context

Spanish Colonial Period

The historical period in this portion of the Los Angeles Basin began with the 1769 Spanish expedition of Gaspar de Portolá and Father Juan Crespi, whose party traversed the coastal route that was to become El Camino Real between San Diego and Monterey Bay (Beck and Haase 1974:15). The Portolá expedition passed very near to the current Project area on its way to the Los Angeles River, an event commemorated by a bronze plaque (California Historical Landmark No. 655) located at the northwestern corner of North Broadway and Elysian Park Row Drive, near the northern end of the Project area.

Mission San Gabriel del Arcángel—the fourth mission established in Alta California—was founded in 1771 some 12.6 km (7.8 miles) east-northeast of where the Pueblo of Los Angeles was to be established.

Charles III, King of Spain, authorized the founding of El Pueblo de Nuestra Señora de Los Angeles de Porciuncula in 1781 (Guinn 1915:58, 353). The original pueblo was small, originally consisting of fewer than 50 settlers, a detachment of soldiers, 2 priests, and an unspecified number of neophytes drawn from the local village of Yaangna.

The growth and development of the Pueblo of Los Angeles and its surrounding lands was largely due to the success brought by bringing water from the nearby Los Angeles River. That was accomplished by the excavation of a large open ditch known as the Zanja Madre ("Mother Ditch"), which would eventually be expanded into a complex network of irrigation ditches that served the growing pueblo, and later city, of Los Angeles. Work on the Zanja Madre began almost immediately upon establishment of the pueblo in 1781, and part of its original course ran along the base of a sloping hill below what is today North Broadway, within the current Project area.

Mexican Period

Following Mexican independence in 1821 and secularization of the missions in 1834, settlement and agricultural development was encouraged on former mission lands outside the pueblo (Beck and Haase 1974:24; Hornbeck 1983:58). The Pueblo of Los Angeles, which was initially granted a square league for its operations, remained an important population center, and its lands were not confiscated by the Mexican government like the mission lands around it. The pueblo continued to grow, was granted the new title of "*ciudad*" in place of "pueblo," and was designated the territorial capital of Alta California.

American Period

The Mexican-American War began in 1846, and American troops quickly occupied the City of Los Angeles, which was at that time the territorial capital of Alta California. It officially became American territory with the signing of the Treaty of Guadalupe Hidalgo in 1848, along with the rest of the California territory. The former pueblo quickly became a prominent city in the territory and was incorporated as an American city on April 4, 1850, shortly before California was granted statehood in September of that year.

The discovery of gold in northern California in 1848 sparked a large migration of people to the California territory, many of whom eventually settled in and around Los Angeles, dramatically expanding both its population and its regional importance. The Sonoratown neighborhood, southwest of the current Project area, was established at that time by waves of Mexican miners who were forced from the gold fields of central California and settled in Los Angeles rather than continuing southward.

Agriculture and ranching remained key industries in the Los Angeles area, and the zanja system, with the original Zanja Madre at its core, expanded to support growing needs. It was such a vital part of local infrastructure that the position of "*zanjero*" was created to oversee the maintenance and fair use of the channel system. Improvements, including the enclosure of segments of the zanja in wood or brick were repeatedly undertaken, but the improvements were not enough to keep up with the growing city, which abandoned the zanja system by about 1906.

In addition to agriculture, industry became a key component of Los Angeles beginning in the 1830s, and it played a major role in shaping the physical growth of the city, with industrial districts replacing former agricultural areas and pushing both agriculture and neighborhoods out from an increasingly urban center. Mills, factories, and other industrial buildings sprang up near the Los Angeles River, and products were distributed by an expanding network of rail lines. River Station, located in and adjacent to the current Project area, was under construction by 1875 and served as a transport hub for both people and freight.

River Station

A complete summary and timeline of River Station is presented in the historical resources technical report (HRG 2025), and the following summary is largely drawn from information presented in that report.

River Station was established in 1875 by the Southern Pacific Railroad (SPRR) as both a freight depot and a passenger hub. Key passenger lines ran eastward to Yuma and northward to approximately San Francisco and later to New Orleans with the completion of the southern transcontinental route in 1881. By the

late 1880s, River Station could no longer accommodate the ever-increasing demands of passenger traffic, and the SPRR built a new passenger terminal, the Arcade Depot, 3 km (2 miles) to the south. Passenger operations at River Station ceased in 1902, when the passenger depot and associated Pacific Hotel were removed and rebuilt in new locations at the southern end of the property.

Freight-transport operations were a key component of River Station operations from its construction to the final closure of the rail yard in 1992. River Station allowed Los Angeles to compete with San Diego as the key freight hub of southern California, and much of the rail-yard construction was geared toward the movement of goods. A freight house and several shop buildings were among the first constructed on the property, and by the mid-1880s, the station was home to a 26-stall roundhouse and turntable, along with a large number of maintenance and shop buildings. In 1904, the turntable and roundhouse were dismantled and moved to a new site across the Los Angeles River; they were replaced by new rail lines that continued to serve until the final closure of River Station in 1992. All the original River Station structures had been moved or demolished by the end of 1904, although a number of other buildings were constructed after that time to serve ongoing freight operations.

Applicable Regulations

The purpose of this investigation is to evaluate potential impacts to surficial cultural resources within the Project area and to assess the probability of the presence of subsurface cultural resources within the Project parcels, following the California Environmental Quality Act (CEQA; *Public Resources Code* [PRC] 21000 *et seq*.) guidelines regarding cultural resources. This investigation can be used to prepare the relevant cultural resource documents in support of an Environmental Impact Report. The proposed Project is considered a "project" under CEQA and is subject to compliance with CEQA and the CEQA guidelines (14 *California Code of Regulations* [CCR] 15000 *et seq.*), as amended to date. The City of Los Angeles is the CEQA lead agency. CEQA mandates that lead agencies consider whether a proposed project will have an adverse effect on the environment and whether any such effect can be feasibly eliminated by pursuing an alternative course of action or can be mitigated to less-than-significant levels. CEQA recognizes that historical resources are parts of the environment and that "a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment" (PRC 21084.1).

For the purposes of CEQA, a historical resource is any object, building, structure, site, area, place, record, or manuscript listed in or eligible for listing in the California Register of Historical Resources (CRHR; PRC 21084.1). A resource is eligible for listing in the CRHR if it meets any of the following criteria (PRC 5024.1[c]):

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

(2) Is associated with the lives of persons important in our past.

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

(4) Has yielded, or may be likely to yield, information important in prehistory or history.

CEQA also requires the lead agency to consider whether the Project will have a significant effect on unique archaeological resources that are not eligible for listing in the CRHR and to avoid unique archaeological resources, when feasible, or mitigate any effects to less than significant levels (PRC 21083.2). As defined by CEQA [PRC 21083.2(g)], a unique archaeological resource is

an archaeological 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) 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.

(3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

The Project is also subject to the provisions of the City of Los Angeles Standard Conditions of Approval for Inadvertent Discovery of Archaeological Resources and to the provisions of Assembly Bill (AB) 52, which amended PRC 5097.94 and added PRC 21073, PRC 21074, PRC 21080.3.1, PRC 21080.3.2, PRC 21082.3, PRC 21083.09, PRC 21084.2, and PRC 21084.3 to require lead agencies to consult with California Native American tribes that have requested notification and are traditionally or culturally affiliated with the geographic area of the Project and to consider the effects of a project on tribal cultural resources. Formal government-to-government tribal consultation pursuant to AB 52 is being conducted by the City of Los Angeles.

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California *Health and Safety Code* (HSC) 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (HSC 7050.5[b]). PRC 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe that the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (HSC 7050.5[c]). The NAHC will notify the "most likely descendant" (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. That inspection must be completed within 48 hours of notification of the MLD by the NAHC. The MLD may recommend means of treating or disposing of, with appropriate dignity, the human remains and associated items.

Cultural Resource Study: Methods

Archaeological Records Search

Three records searches have been performed for the Project at or by the South Central Coastal Information Center, a regional repository of the California Historical Resources Information System (CHRIS). The purpose of the records searches was to identify all previously recorded sites, buildings and structures, and relevant reports of previously completed studies within the Project area and a 1-mile (1.6-km) radius of the Project area. The reviewed records included all investigation reports and resource records from the following sources: the National Register of Historic Places (NRHP), the CRHR, California Historical Landmarks, California Points of Historical Interest, the California Office of Historic Preservation State Historic Resources Inventory, and the Los Angeles Historic-Cultural Monuments list. The first records search was conducted in September 2017, and additional searches were conducted in November 2019 and May 2022. Collectively, the records searches identified 78 cultural resource studies conducted within 1 mile (1.6 km) of the Project area, none of which specifically covered the Project area, and 206 resources, 3 of which overlap or are adjacent to the Project area: 2 separately recorded segments of the Zanja Madre (P-19-003103/CA-LAN-3103 and P-19-190309) and the River Station site (P-19-003120/CA-LAN-3120, Los Angeles Historical Cultural Monument 82). Full details of the records search can be found in Appendix E.

In addition to the archaeological records searches, requests for two SLF searches were submitted to the NAHC to identify traditional-use areas or sacred sites within and near the Project area and to obtain a list of specific Native American groups or individuals that may have knowledge of Native American resources within the Project area. The first SLF search was requested in 2017 and yielded positive results and a recommendation to contact the Gabrieleño Band of Mission Indians–Kizh Nation for specific information. Five additional points of contact were provided. SRI made a separate SLF search request and received negative results from the NAHC on April 18, 2022. The NAHC provided a Native American–contacts list consisting of 10 contacts that could potentially provide information on traditional-use areas or sacred sites within the Project area (see Appendix D). SRI was not requested to perform any additional tribal outreach for this Project.

Archival and Historical Background Research

In addition to the archaeological records searches discussed above, SRI drew heavily from the historic context and overview presented in the Historical Resources Technical Report (HRG 2025), which was developed with archival research using primary historical sources with information specific to the Project area. In particular, maps, building permits, photographs, and aerial photographs were reviewed; many of these were published in the reports. SRI consulted additional resources, such as the Los Angeles Citywide Historic Context Statement (City of Los Angeles 2020), reports and articles concerning treatment of exposed sections of the Zanja Madre (Furnis and Gust 2015; Gust and Parker 2004; Jao 2014), and the hazards and hazardous-materials technical report for the Project (Marr and Arslanian 2024), which contains information about oil wells reported within the Project area and a summary of known buildings within the Project area.

Pedestrian Survey

Archaeological fieldwork involved intensive systematic pedestrian survey of the Project parcels to identify and record prehistoric or historical-period cultural resources. Resources identified in the previous HRG (2025) historical resource technical report, which involved archival research but only a limited survey component, were identified and photographed in the field, and their descriptions were updated. Also, additional, newly identified resources were recorded, reported on DPR forms, and evaluated. Locational data were collected using Global Positioning System (GPS) units with submeter accuracy. Photographs were taken of all identified resources. The survey did not include excavation or artifact collection.

Cultural Resource Study: Results

Historical-Period Land Use within the Project Area

The current Project area has an unusual shape, with a narrow strip through the middle, two wider sections at each end, and a significant slope below North Broadway. The Project area has not historically been recognized as a single parcel and therefore does not have a shared development history. The flat area in the south has been the focus of the most development, with a number of smaller buildings constructed on some of the flat areas along North Broadway. A number of historic contexts and themes under which to consider historical-period properties were developed as part of SurveyLA 2020, a historical resource survey conducted by the City of Los Angeles (2020). The two city-planning areas relevant to the Project area are the Central City North

Community Plan Area and the adjacent Cornfield Arroyo Seco Specific Plan. Historical-period themes associated with these areas include industrial development, residential development, and commercial development. The River Station Historic Vernacular Landscape is also present within the Project area. These were all considered when the significance of historical-period resources within the Project area was evaluated.

The oldest known constructed feature within the Project area is the Zanja Madre, originally an open ditch and later an enclosed brick conduit running along the base of the slope below modern North Broadway. The general location and alignment of the Zanja Madre have long been known, and over the years, sections have been exposed in and around the Project area. A large segment of the feature was discovered immediately outside the Project area in the Metro A Line ROW, and at least one intact segment is known and visible within the South Parcel.

The SPRR River Station operated from 1875 to 1994 and had a major influence on the development of the surrounding area. As the role of River Station grew in importance from the late 1800s to the early 1900s, the rail yard expanded from the area now containing Los Angeles State Historic Park into the Project area. No major components of the rail yard were located within the Project area, but tracks and auxiliary buildings were constructed within the boundary of the South Parcel.

Several commercial buildings have occupied portions of the Project area at various times in its history, although none is currently extant, except an addition to a larger building fronting on North Broadway near the southern end of the Project area. Foundation remains within the Project area are most likely the last vestiges of various commercial endeavors, including cold storage, wholesale operations, restaurants, and a gas station.

There is some history of residential construction within the Project area dating to the late 1800s. A number of houses and tenement buildings, likely related to operations at the rail yard, were built on the North Parcel but were demolished in the early 1900s. No other residential construction is known to have occurred within the Project area.

Field Survey

Archaeological fieldwork involved pedestrian survey of the Project parcels to identify and record cultural prehistoric and historical-period resources. On March 3 and 8, 2022, Patrick Stanton, M.A., RPA, and Kenneth Becker, M.A., RPA, surveyed the parcels within 8.08-acre (3.27-ha) Project area by walking over all accessible areas within the Project footprint, including open slopes, paved areas, exposed foundations, and the interior of SRI-21 (Feature No. 3; the SPRR Automobile-Repair Garage). Inaccessible portions of the Project area included areas where vehicles or other obstacles impeded views of the ground, fenced areas with locked gates, and the interiors of buildings (with the exception of the previously noted SPRR Automobile-Repair Garage).

In addition to systematic pedestrian survey, SRI conducted GPR investigations for the purpose of identifying the extent and course of the Zanja Madre within the Project area . The findings of that investigation, which also involved mapping several segments of newly identified buried railroad tracks, are presented in Appendix B. Following completion of an initial phase of GPR assessment, SRI completed additional GPR work in (1) areas that were inaccessible during the initial effort, and (2) areas of particular interest with regard to the Zanja Madre, which is presented in Appendix C.

Previous archival research and site visits by HRG (2025) had identified 27 built-environment features within the Project area, including both modern and historical-period construction. SRI's pedestrian survey located all but one of those features: a square pit that had been destroyed since the time of HRG's work. Seventeen of the features previously reported by HRG that were found by SRI to be still extant were not recorded, because they did not meet the 50-year threshold. A square pit noted by HRG was no longer present at the time of SRI's pedestrian survey. SRI staff identified 4 additional cultural resources dating to the historical period, resulting in a total of 13 historical-period cultural resources that were recorded on DPR forms (Figure 3; Table 1). No prehistoric cultural resources were identified.

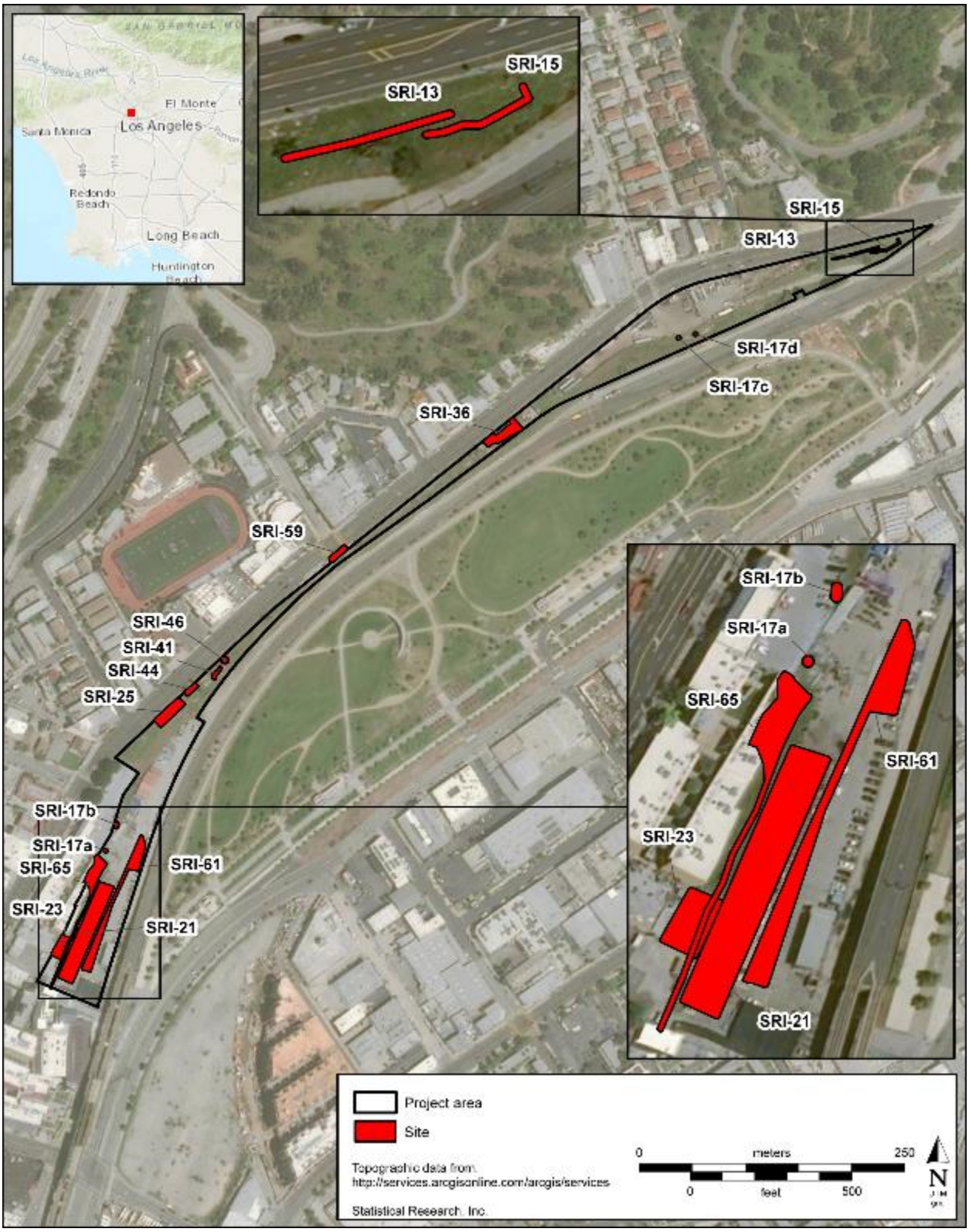

Figure 3. Map showing the results of the cultural resource survey.

Table 1. Cultural Resources Recorded within the Project Area

SRI Site No.	HRG No.	Resource Description	Construction Year(s)	CEQA Historical Resource?
13		buried road surface	unknown	no
15		pipeline (PD 16)	unknown	no
17a-17b		Zanja Madre	ca. 1875	yes
21	3	SPRR Automobile-Repair Garage	1953–1958	no
23	4	Golden Dragon Restaurant rear addition	1955 (original building 1946)	no
25	8	Foundation A	1949	no
36	21	Foundation C	unknown	no
41	10	footings	possibly c. 1894	no
44	9	Foundation B	Pre-1950	no
46	12	round tank	unknown	no
59	18	guardrail	unknown (estimated early twentieth century)	no
61		railroad tracks (PDs 62–64)	historical period, specific age unknown	no
65	5	foundation remnants	unknown	no

Key: PD = SRI field provenience designation.

Resource Descriptions and Eligibility Recommendations

During the pedestrian survey, SRI identified and documented 13 cultural resources. For each resource, this section provides a description, an assessment of its significance, and SRI's CRHR- and NRHP-eligibility recommendations. The resources are listed by both the number assigned by SRI and, where applicable, the number previously assigned by HRG.

SRI-13 (Buried Road Surface)

SRI-13 appears to be a buried road surface exposed in an erosional hill slump in the northeastern portion of the Project area. The possible road surface appears as a dark-banded stratum measuring approximately 4 inches (10.2 cm) thick (Figure 4). The bottom of the stratum is an approximately 1-inch- (2.5-cm) thick lens of crumbly asphalt-like material. This stratum is perched on top of bedrock and is approximately 3 feet (0.9 m) below the current ground surface at the top of the bluff. The exposure is approximately 98.5 inches (250.2 cm) wide. The bottom lens of asphalt-like material is buried by at least 2.75 inches (7.0 cm) of fill. This feature may have been transported downslope from its original position higher up the slope by landslide activity. Although the road segment may be historical period in age, it is not directly associated with events or people that have made a significant contribution to the broad patterns of our history, nor is it a distinctive or artistic example of local road construction. Beyond the recording of the extant segment, no further significant archaeological or historical information is likely to be gleaned from the resource. SRI recommends the buried road surface *not eligible* for listing in the CRHR or NRHP.



Figure 4. Detail of the buried road surface (SRI-13).

SRI-15 (Pipeline)

SRI-15 is a 1.5-inch- (3.8-cm) diameter galvanized pipeline. The pipe is hung along the sides of a series of 6-by-6-inch (15.2-by15.2-cm) wooden posts spaced 13–16 feet (4.0–4.9 m) apart near the northeastern corner of the Project area (Figure 5). The posts are notched on top as if to support a larger pipe and have been treated with creosote. The pipe was hung on the downslope side of the posts using manufactured pipe hangers, and segments were joined with threaded couplings. The pipe is buried at both ends and also in other locations along its recorded length. At the eastern end of the alignment, the pipe is exposed about 3 m (9 feet) southeast of a billboard (SRI-9 [HRG Feature No. 27]). It runs straight downslope, makes a 90° turn to the west, and continues in that general direction, with several small bends, for about 95 feet (29.0 m). The posts extend about 16 inches (40.6 cm) above the ground surface. Many of the posts have burned. There is evidence of recent brush fire in the area, and the condition of the resource is fair. Although no construction date has been established for this feature, the observed materials and design indicate that it dates to the historical period. The pipeline is not directly associated with events or people that have made a significant contribution to the broad patterns of our history, nor is it a distinctive or artistic example of local road construction. Beyond the recording of the extant segment, no further significant archaeological or historical information is likely to be gleaned from the resource. SRI recommends the pipeline *not eligible* for listing in the CRHR or NRHP.



Figure 5. Elevated pipeline section on wooden posts (SRI-15).

SRI-17 (Brick Features, Zanja Madre)

SRI-17a–SRI-17d are several sections of exposed brick features documented during the pedestrian survey by SRI. Features SRI-17a and SRI-17b were tested with GPR and were confirmed to be portions of the Zanja Madre. Two brick features, 17c and 17d, in the northern Project parcel could not initially be tested using GPR, because they were located on steep slopes, but are not portions of the Zanja Madre. Additional GPR surveys were successful at further delineating the possible pathway of the Zanja Madre. Certain ambiguous areas (including 17c and 17d) were eliminated as portions of the Zanja Madre, particularly in light of the test excavations. It now appears highly likely that no part of the Zanja Madre is present in the North Parcel.

The two GPR-confirmed sections of the Zanja Madre (SRI-17a and SRI-17b) are in the southern portion of the Project area and are partially exposed at the current ground surface. The exposed portions were constructed of two courses of red brick cemented with coarse mortar, and they form a hollow tube with an interior diameter of about 3 feet (0.9 m) where intact (Figures 6 and 7). The southernmost, exposed section (SRI-17a), immediately north of SRI-65, is in poor condition and appears to represent a broken portion of the Zanja Madre that has been moved slightly from its original position, rotating parallel to the hillslope. The other section (SRI-17b) appears to be intact and in its original position. Its alignment is consistent with a previously documented section located approximately 250 m (820 feet) to the northeast in an inaccessible area along the Metro A (Gold) Line on Los Angeles County Metropolitan Transit Authority property, just outside the Project Site. This segment was initially recorded in 2004 by Cogstone (Gust and Parker 2004) as resource P-19-190309 and later noted by HRG and labeled as HRG-15. Both intact sections appear to represent the original course of the Zanja Madre, first constructed as an open ditch in ca. 1781 and then enclosed in brick between 1884 and 1888.

. GPR documentation of SRI-17 confirmed its location and provided information about its condition and its likely buried course within the Project area. Although a portion of the potential alignment could not be tested with GPR because of the steeply sloping hillside, Project areas that could be tested did indicate that the intact section continues northward along the hillslope and then appears to continue northeastward, likely crossing under a portion of the existing parking lot before continuing outside the Project area along its historical course.

The Zanja Madre, multiple sections of which have been identified within and adjacent to the Project area, is an important archaeological and historical resource that appears to have significance under CEQA. The Zanja Madre is an archaeological site that is a historical resource under CEQA. It is directly associated with the establishment of the Pueblo of Los Angeles, as well as its success and its subsequent development. The historic context of the Zanja Madre has been well established by previous studies. In 2008, Galvin Preservation Associates submitted an NRHP nomination to the California Office of Historic Preservation for a 75-foot segment of the Zanja Madre just outside the Project area. The nomination identified the structure as eligible under NRHP Criterion A for association with events making a significant contribution to the broad patterns of history, with a period of significance of 1781–1904. In 2009, the nomination was declined by OHP with the comment that the nomination did not "discuss how this small segment of the extensive water conveyance system conveys the Zanja Madre's significance for important associations with the development of Los Angeles." The response stated further that "it is possible for a segment of a larger resource to meet eligibility requirements if it can be documented to be a rare surviving element of the larger system. In this case, the nomination must be a rare surviving element of the larger system. In addition, the nomination must establish the segment as the only or best surviving element of the system and demonstrate that the segment retains the essential physical features necessary to convey historic character of the resource" (HRG 2025:61).



Figure 7. Interior of the exposed section of the Zanja Madre with, showing the modern refuse (SRI-17a).



Figure 6. Exposed section of the Zanja Madre (SRI-17b).

Since that time, additional sections of the Zanja Madre elsewhere in the City, such as the section discovered beneath the Blossom Plaza project at 900 N. Broadway, have been removed or demolished. The intact portions of the Zanja Madre within the Project area are among the remaining sections that present an opportunity for preservation or creative mitigation. The Zanja Madre is a historical resource directly associated with the establishment of the Pueblo of Los Angeles, as well as its success and its subsequent development.

SRI-21 (HRG Feature No. 3; the SPRR Automobile-Repair Garage)

SRI-21 (HRG Feature No. 3; the SPRR Automobile-Repair Garage) is a 40-by-320-foot (12.2-by-97.5-m) building constructed of corrugated-sheet-metal siding attached to a steel girder frame. The girders are supported by concrete foundation walls, and the interior floor is poured concrete. Six vehicle-access doors of the metal roll-up type are present along the eastern side of the building, as are three metal pedestrian doors that appear to be later modifications to the building (Figure 8). The SPRR Automobile-Repair Garage was built in several stages between 1953 and 1958 and was part of the operations for the River Station rail yard. It appears to have been used for a number of vehicle-related uses through time, including as a prop garage, a wash rack, and an automobile-repair garage.

The building is within the boundary of the River Station area and should be considered within that context. River Station is a local historical monument (Los Angeles Historic-Cultural Monument No. 82) that encompasses the current Project area and the adjacent Los Angeles State Historic Park. According to the historical resource technical report (HRG 2025), when the historical monument was listed in 1971, it specifically excluded associated buildings and structures, and nearly all the structures associated with the rail yard have since been demolished, built over, or otherwise removed. The building was constructed of



Figure 8. Eastern side of the SPRR Automobile-Repair Garage, showing the roll-up doors (SRI-21 [HRG Feature No. 3]).

common materials (steel and concrete) and was used for a variety of purposes related to the care and maintenance of automobiles. It was built at the margin of the freight yard well after the time of its conversion from a passenger rail yard (River Station) in 1904. The building itself lacks a visual connection to railroad history and appears to have been altered by the addition of several pedestrian doors and the installation of upgraded electrical systems. Although the building retains integrity of location, materials, and design, it does not retain integrity of setting, workmanship, feeling, or association. Considering that the monument listing excluded buildings, SRI recommends SRI-21 (HRG Feature No. 3; the SPRR Automobile-Repair Garage) *not eligible* for listing in the CRHR or NRHP.

SRI-23 (HRG Feature No. 4; Building Addition)

SRI-23 (HRG Feature No. 4) is a rectangular stucco addition to a larger building currently housing the Golden Dragon Restaurant. The original building was constructed in 1946, and the addition was built in 1955. The north facade is plain and has two large, repaired holes (Figure 9). The south facade was blocked from view within the survey area by a fence; inspection of current imagery indicated the presence of a door and a window on that side of the building. The east facade has three windows high on the southeast corner of the building. Each window consists of eight lights in a four-over-four pattern. The east facade has one small repair similar to those observed on the north facade. Although the building is historical period in age, it does not meet any CRHR- or NRHP-eligibility criteria. It is not associated with important people or events in history, nor is it a distinctive or artistic example of a building addition or the work of a master, and it holds no further significant archaeological or historical information. SRI recommends the Golden Dragon Restaurant building addition *not eligible* for listing in the CRHR or NRHP.



Figure 9. Northern side of the Golden Dragon Restaurant rear addition, showing repairs (SRI-23 [HRG Feature No. 4]).

SRI-25 (HRG Feature No. 8; Foundation A)

SRI-25 (HRG Feature No. 8; Foundation A) is a poured-concrete building foundation likely associated with a cold-storage/wholesale-seafood building constructed in 1949 and demolished by 1964. The foundation is composed of two elements, an elevated C-shaped platform with its open side facing North Broadway that likely supported the building and a street-level area of poured concrete within the C shape that may have served as a loading dock (Figure 10). Two railroad rails have been set vertically into the possible loading-dock area near the raised building section, where they may have served as a barrier to vehicles backing up to a loading door or similar structure. Although the foundation is historical period in age, it is not associated with important people or events in history, nor is it a distinctive or artistic example of a building addition or the work of a master, and it holds no further significant archaeological or historical information. SRI recommends the cold-storage/wholesale-seafood building foundation *not eligible* for listing in the CRHR or NRHP.



Figure 10. Overview of Foundation A (SRI-25 [HRG Feature No. 8]).

SRI-36 (HRG Feature No. 21; Foundation C)

SRI-36 (HRG Feature No. 21; Foundation C) consists of two poured-concrete features, a trapezoidal-shaped section of poured concrete with a large metal eye with a 0.5-inch (1.3-cm) braided-steel cable attached and a linear poured-concrete slab that looks much like a sidewalk (Figure 11). The trapezoidal segment is located at the edge of a bluff and extends vertically down the bluff side. The walkway is fractured and broken in many places, and the condition is poor. The entire area is highly disturbed, and additional concrete slabs may be present but obscured. A large pile of brick and concrete construction debris was observed near the extant features, immediately in front of a bucket from a small Bobcat front-end loader. Research completed by HRG (2025:24) indicated that the foundation features "may be remnants of a Southern Pacific [Railroad] tenement building and a cluster of five detached store and dwelling structures" shown on the 1894 Sanborn Map Company (Sanborn) map, "may be associated with a one-story twoflat [*sic*] residence" mapped in this approximate location in 1906, or could represent a "small one-story gas and oil building" near this location during the early 1950s. The feature is not directly associated with events or people that have made a significant contribution to the broad patterns of our history, nor is it a distinctive or artistic example of local construction. Beyond the recording and documenting of the remaining structural components, no further significant archaeological information is likely to be gleaned from the resource. SRI recommends SRI-36 (HRG Feature No. 21; Foundation C) *not eligible* for listing in the CRHR or NRHP.



Figure 11. Extant portion of Foundation C (SRI-36 [HRG Feature No. 21]).

SRI-41 (HRG Feature No. 10; Footings)

SRI-41 (HRG Feature No. 10) is a pair of pyramidal concrete footings that have been heavily impacted by recent activity (Figure 12). When the site was visited by HRG, about a dozen footings were present, but the majority have been removed or destroyed since that time. Based on HRG's (2025:22) research, the footings may represent a one-story single-family residence that was present on the property at least as early as 1894 and was demolished by 1950. The footings are not associated with important people or events in history, nor are they a distinctive or artistic example of a footing construction or the work of a master, and they hold no further significant archaeological or historical information. SRI recommends SRI-41 (HRG Feature No. 10) *not eligible* for listing in the CRHR or NRHP.



Figure 12. Intact footing (SRI-41 [HRG Feature No. 10]).

SRI-44 (HRG Feature No. 9; Foundation B)

SRI-44 (HRG Feature No. 10; Foundation B) is a poured-concrete slab that likely served as a building foundation. The foundation was photographed during one of the HRG site visits. HRG (2025) described it as a rectangular concrete slab, but the shape of the slab was obscured during SRI's current survey. The feature was behind a fence in a locked yard and could not be directly accessed by SRI staff (Figure 13). The exact date of construction is unknown, but Sanborn maps provide some information. A one-story building is shown in this location on the 1950 Sanborn map. By 1953, the building had a front addition. By 1961, the building was listed as vacant and was owned by Wallace Lee Gown. The building was listed as a vacant restaurant in 1964 and 1965. Research did not disclose the date of demolition. Although the foundation is historical period in age, it is not associated with important people or events in history, nor is it a distinctive or artistic example of a building addition or the work of a master, and it holds no further significant archaeological or historical information. SRI recommends SRI-44 (HRG Feature No. 9; Foundation B) *not eligible* for listing in the CRHR or NRHP.



Figure 13. Foundation B (SRI-44 [HRG Feature No. 10]).

SRI-46 (HRG Feature No. 12; Subterranean Tank)

SRI-46 (HRG Feature No. 12) is a round, subterranean concrete tank with a concave top and an open-ended metal pipe. The top of the tank is level with the current ground surface on the edge closest to North Broadway and is elevated roughly 16 inches (40.6 cm) on the edge closest to the edge of the bluff (Figure 14). The feature was constructed of a circular perimeter ring of concrete measuring 10 inches (25.4 cm) wide and a concave concrete disk inside the ring. The diameter of the feature is 175 inches (444.5 cm). Remnant mortar is visible on the upper surface of the outer ring, suggesting that some kind of lip or curb was attached to this surface at one time. According to research completed by HRG (2025:22), the tank may have replaced two elevated water tanks in this location in 1906. Those tanks were likely built by the SPRR, which had an adjacent well and pumping station. Although the date of construction for the concrete tank is unknown, the elevated tanks had been removed by 1950. The tank is in good condition. The open-ended pipe is nearby, at the corner formed by the fence along North Broadway and the fence on the eastern side of Area 3. The tank extends 8.5 inches (21.6 cm) above the current ground surface. It is not associated with important people or events in history, nor is it a distinctive or artistic example of construction or the work of a master, and it holds no further significant archaeological or historical information. SRI recommends SRI-46 (HRG Feature No. 12) *not eligible* for listing in the CRHR or NRHP.



Figure 14. Top of the underground tank (SRI-46 [HRG Feature No. 12]).

SRI-59 (HRG Feature No. 18; Guardrail)

SRI-59 (HRG Feature No. 18) consists of a decorative guardrail set on a low concrete wall at the end of Bishops Road, at its "T" intersection with North Broadway. It is formed of steel lattice mesh hung on posts, each of which was constructed of four pieces of L-shaped angle iron bolted together to form a cruciform cross section (Figure 15). Each post is topped with a ball finial. The guardrail is embedded in the top of a 16-inch- (40.6-cm-) high poured-concrete wall. The guardrail extends 2 feet (0.6 m) above the top of the wall. As a pedestrian component within the public right of way, the guardrail is outside the Project area; however, the area will become part of the Project as part of the 3-foot dedication. The Project will not alter or expand the sidewalk in this area. Although the railing appears to be historical period in age based on its construction, it is not directly associated with events or people that have made a significant contribution to the broad patterns of our history, nor is there any record of its being the work of a notable architect or a rare surviving example of a particular style. No further significant archaeological or historical information can be gleaned from the resource. SRI recommends the guardrail *not eligible* for listing in the CRHR or NRHP.



Figure 15. Decorative guardrail (SRI-59 [HRG Feature No. 18]).

SRI-61 (Railroad Tracks)

SRI-61 consists of three sets of railroad tracks in the paved parking lot of SRI-21 (HRG Feature No. 3; the SPRR Automobile-Repair Garage). These tracks are immediately east and north of the garage building. All three sets have been paved over. The features are noticeable mostly as sets of parallel cracks in the asphalt that runs parallel to the SPRR Automobile-Repair Garage (Figure 16). In a few places, the asphalt has peeled away, exposing metal rails. The spaces between the cracks consistently measure 62 inches (157.5 cm). Two of the tracks are joined by what is assumed to be a switch track near the northern end of the garage, and a very small portion of the switch plate is exposed in that area. The other, isolated set of cracks and exposed rail is near the eastern edge of the parking area. Following the identification of these tracks during the pedestrian survey, GPR survey was conducted in the parking lot to verify the track locations and to look for additional segments. The locations of all three sets of tracks were confirmed and mapped with GPR, but no additional segments were identified in the immediate area; it is possible that other buried sections of track remain in areas where they could not be identified at the surface and thus were not surveyed via GPR. Scattered areas of concrete slab of indeterminate age are present in the parking lot. The tracks are almost certainly remnants of freight operations of the SPRR. Construction on the first SPRR lines began in 1875, and operations continued until 1994. Given the location of the site at the margin of the land owned by the railroad, it is likely that the tracks were part of later freight operations rather than the early passenger lines that ceased operation in the early 1900s. The SPRR Automobile-Repair Garage was built very close to the tracks in the 1950s, possibly indicating that the tracks were not in heavy use, or possibly any use, by that time.

The tracks are within the boundary of the River Station area and should be considered within that context. River Station is a local historical monument (Los Angeles Historic-Cultural Monument No. 82) that encompasses the current Project area and the adjacent Los Angeles State Historic Park. According to the historical resource technical report (HRG 2025), when the historic monument was listed in 1971, it specifically excluded all structures, and nearly all the structures associated with the rail yard have since been demolished, built over, or otherwise removed. As isolated features, the tracks lack direct association with railroad operations within the Project area. Considering that the monument listing excludes structures, SRI recommends the remnant railroad tracks *not eligible* for listing in the CRHR or NRHP.



Figure 16. Buried railroad tracks under the parking lot (SRI-61).

SRI-65 (HRG Feature No. 5; Foundation Remnants)

SRI-65 (HRG Feature No. 5) consists of three sets of foundation remnants on the slope and bottom of the slope below the Mandarin Plaza. When viewed from above, the series of foundations appears to form a cohesive set that likely supported the same structure. The primary feature is a long concrete-and-rubble foundation remnant that extends southwest–northeast, from the western property boundary eastward to a point beyond the northern end of SRI-21 (HRG Feature No. 3; the SPRR Automobile-Repair Garage). This feature is trapezoidal in cross section and has a vertical interior surface (toward the slope) and a sloping exterior surface (Figure 17). The exterior surface slopes to the east, giving the foundation the appearance of a revetment. Perched on top of this lower wall is an attached upper building-foundation wall that appears to have been formed and poured separately from the lower wall. Sections of railroad rails protrude from beneath the downslope side of the foundation but do not appear to be embedded in it, suggesting that they may have been set in after initial construction, possibly to brace the structure. Two additional foundation remnants, one C shaped and one L shaped, are present on the slope above the main foundation. A single concrete footing with an I beam set vertically into it is present to the north of the rest of the foundation remnants. The features do not appear on any of the historical maps. Based on materials and design, the foundation remnants appear to be historical period in age; however, they are not directly associated with events or people that have made a significant contribution to the broad patterns of our history, nor are they distinctive or artistic examples of local building construction. Beyond the recording and documenting of the remaining structural components, no further significant archaeological or historical information is likely to be gleaned from the resource. SRI recommends the SRI-65 (HRG Feature No. 5) foundation remnants *not eligible* for listing in the CRHR or NRHP.



Figure 17. Foundation feature (SRI-65 [HRG Feature No. 5]).

Archaeological Test Excavations

In November 2023, SRI completed archaeological test excavations to assess whether two exposed sections of mortared brick on the hillslope in the northeastern portion of the Project area (identified as SRI-17c and SRI-17d; see Appendix B) were related to the Zanja Madre. The methods and results of this phase of work is detailed in Swope (2024) and confirmed that neither segment is associated with the Zanja Madre. Another exposed section of brick, SRI-17a, appears to be an intact section of the Zanja Madre; however, it has been displaced out of its original alignment.

Additional GPR Studies

Additional GPR surveys were conducted in November 2023 to assess areas that had been previously inaccessible in an attempt to further delineate the path of the Zanja Madre. The methods and results of the additional GPR work is detailed in Swope (2024). The investigation did not show intact portions of the Zanja Madre in any of the transects collected, suggesting that the Zanja Madre either is no longer present in the southern portion of the Project area or has deteriorated to such an extent that it is not resolvable in the GPR data.

During the survey, SRI noted a linear cluster of bricks beneath a retaining wall between the buildings. Its location seemed to match the possible path of the Zanja Madre as it continues southward.

The bricks are located in an area that was inaccessible for archaeological test excavation and were not assigned Feature numbers; however, our working hypothesis is that the linear cluster of bricks represents a portion of the Zanja Madre damaged/destroyed during the construction and installation of retaining walls in the southern area.

In the Northern Parcel, no reflections related to the Zanja Madre were identified.

Conclusions

We have prepared the following conclusions based on the results of archival research, intensive pedestrian survey, records searches, and review of previous technical reports. These lines of inquiry resulted in an understanding of the geologic and cultural setting, land use, and development of the Project area and vicinity.

Cultural Resource Study

Prehistoric Archaeological Resources

The likelihood that intact prehistoric remains are preserved within the Project area is low, but it is possible, given the age of the underlying geologic deposits (see Appendix A) and the proximity to the Los Angeles River and the ethnographic villages of Yaangna and Maungna. Though not expected, prehistoric deposits would be more likely to be preserved in areas where the natural topography has been minimally altered by historical-period and recent construction, particularly in some portions of the South Parcel. In the unlikely event that prehistoric materials or deposits are preserved within the Project area, those items may provide information concerning the prehistoric or ethnographic use of the greater Los Angeles area. If they do provide such information, it appears that they would be potentially eligible for listing in the CRHR under Criterion 4, for resources that "may be likely to yield information important in history," and possibly under other criteria, as well. The recommended cultural resource mitigation measure (see below) includes SRI's recommendations for treatment of any prehistoric archaeological resources encountered within the Project

area. The recommended treatment would reduce potential Project impacts on prehistoric archaeological resources to a less-than-significant level.

Historical-Period Archaeological Resources

The results of our research indicate that one cultural resource (the Zanja Madre) within the Project area is a historical resource under CEQA. This water-conveyance feature is directly associated with important historical events, namely the establishment and success of the Pueblo of Los Angeles and the transformation of the Pueblo into the City of Los Angeles. Portions of this resource remain buried, and if intact, they could provide important information about the provision of a critical water supply that enabled the successful settlement and growth of Los Angeles, particularly during the period of transition of the resource from an open-ditch watercourse to an enclosed, engineered brick-masonry feature.

As noted above, the California Office of Historic Preservation (Toffelmier 2009) previously determined that an intact segment of the Zanja Madre near the Project area was not eligible for listing in the NRHP because it did not retain sufficient integrity and because it was not a "rare surviving element" of the water-conveyance system. During the 13 years that have passed since that determination was made, additional segments of the Zanja Madre elsewhere in the City have been encountered and demolished. Intact portions of the brick feature within the Project area are among the remaining portions that still have potential to provide data and the opportunity for creative mitigation through public interpretation.

CEQA also requires the lead agency to consider whether the Project will have a significant effect on historical resources of an archaeological nature and to avoid archaeological resources, when feasible, or mitigate any effects to less-than-significant levels (CEQA Guidelines Sections 15064.5(c) and 15126.4(b)(3)). By CEQA definition, the Zanja Madre is a unique archaeological resource and historical resource. The Zanja Madre contains important information capable of answering research questions related to the transition period from the original open ditch to the enclosed brick conduit. Also, there is demonstrable public interest in this feature.

The cultural resource mitigation measure (see below) includes SRI's recommendations for treatment of this cultural resource that would result in the reduction of potential Project impacts on the resource to a less-than-significant level.

Human Remains

Although the likelihood that prehistoric or historical-period human remains are preserved within the Project footprint is low, historical data and the results of several previous studies provide some important considerations in this regard:

- The SLF search conducted in 2022 at the request of SRI (Appendix D) was negative for tribal cultural resources; however, the SLF search conducted in 2017 indicated the presence of tribal cultural resources in the area.
- To date, no archaeological evidence of prehistoric or ethnographic-period activities has been identified at the Project Site. Nevertheless, the proximity of the Project area to two previously noted ethnographic village sites and to the water source provided by the Los Angeles River increases the general sensitivity of the Project area and surrounding areas for prehistoric or ethnographic-period cultural resources, including human burials.
- The potential for buried sites in the southern portion of the Project area was established by the buried-sites-sensitivity analysis completed as part of this investigation (see Appendix A).
- Portions of the natural landscape in the Project area have been repeatedly impacted by the construction and demolition of buildings and structures during the historical period, including the enclosure

and burial of the Zanja Madre, the area's use as a rail yard, and the construction and demolition of various buildings and underground storage tanks.

- It is highly unlikely that any human interments were made within the Project area during the historical period, when land use was largely industrial.
- The CHRIS records search conducted in 2019 identified five previously recorded unmarked burials and/or dedicated cemeteries within the 1-mile (1.6-km) records-search area (P-19-001112/CA-LAN-001112H, P-19-004662/CA-LAN-004662, P-19-120015, P-19-167106, and P-19-174908). One of them (P-19-004662/CA-LAN-004662) consisted of a permineralized human femur discovered at a depth of 19 feet (5.8 m) beneath the existing street surface. Another (P-19-120015) was an unmarked burial discovered 11 feet (3.4 m) below the ground surface.

If human remains are encountered during Project construction, California law provides clear guidance for the appropriate treatment of human remains found outside designated cemeteries (PRC 5097.98 and HSC 7050.5), as well as penalties for the unlawful treatment of human remains (PRC 5097.99 and HSC 7052).

Buried-Site-Sensitivity Assessment

A simplified buried-site-sensitivity assessment was conducted for the Project area using available geologic, soils, topographic, and well-log data (see Appendix A). That analysis determined that the Project area is underlain by a variety of Cenozoic deposits, several of which are too old to contain buried cultural resources (i.e., the Puente Formation and Unit 2 of the Young alluvial deposits). Furthermore, the steep slopes of the central and northeastern portions of the Project area are not conducive to the preservation of intact buried cultural resources. Therefore, only portions of the South Parcel were determined to be sensitive for buried cultural resources. The types of soils built on the sensitive Unit 1 of the Young alluvial-fan deposits are typically considered of high sensitivity to buried archaeological resources. Artificial fill deposits overly the Young alluvial-fan deposits to depths between 0.6 and 2.4 m (2 and 8 feet) below the surface within sensitive areas of the Project area. Proposed construction depths during excavations for the three parking levels associated with Building 2 of the South Parcel would extend below the fill and would impact soils and sediments with a high sensitivity for containing buried cultural resources. The maximum depth at which buried archaeological resources could be expected beneath these portions of the Project area is currently unknown. However, the geotechnical report produced for the Project (Geotechnologies 2025) indicated that the Young alluvial-fan deposits are relatively thick (greater than 21 m [70 feet]) within the South Parcel of the Project area. Coupled with the generally high deposition rate of alluvial fans along mountain margins, archaeologically relevant sediments may be present at significant depths (greater than 3 m [10 feet]). Therefore, the Young alluvial-fan deposits should be considered sensitive for buried cultural resources to the bases of the proposed excavations within the South Parcel.

Recommended Cultural Resource Mitigation Measure

These mitigation measures address all Project impacts to cultural resources, specifically the Zanja Madre, and inadvertent discoveries, to legal and best-practice standards. This study identified confirmed segments of the Zanja Madre on the Project Site. Furthermore, this study has concluded that the Zanja Madre meets the CEQA definition of a historical resource as defined in CEQA Guidelines 15064.5. Implementation of the recommended mitigation measures reduces Project impacts to cultural resources to a less-than-significant level. This mitigation complies with the Conservation Element of *the City of Los Angeles General Plan* (City of Los Angeles 2001:Section II-3) for the protection of archaeological resources. It provides

treatment of cultural resources that is above and beyond the City of Los Angeles Standard Conditions of Approval, by requiring archaeological monitoring to reduce Project impacts to a less-than-significant level. In addition, the mitigation for the Zanja Madre—an archaeological resource and historical resource—enhances opportunities for interpreting the important culture history of the area.

Mitigation Measure CUL-1

Prior to the start of Project ground disturbance, including demolition and vegetation removal, a qualified principal archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology shall be retained to prepare and implement a written Cultural Resources Monitoring and Treatment Plan (CRMTP). The CRMTP shall be prepared in coordination with the Department of City Planning, Office of Historic Resources (OHR) and shall be subject to OHR's review and approval.

The CRMTP shall dictate the process for addressing known archaeological resources as well as unanticipated archaeological resources that may be unearthed during construction, which would include potential prehistoric and historical-period discoveries. In order to account for any such unanticipated resources, the CRMTP shall include a requirement to develop and implement a Worker Environmental Awareness Program (WEAP) that sets forth protocols to train onsite construction workers to identify and appropriately respond to discovery of potential cultural resources that may be inadvertently encountered during earthmoving activities.

The CRMTP shall include protocols for construction monitoring for buried cultural resources that will occur during all excavation activities unless otherwise specified in the CRMTP. Specifically, the CRMTP will reiterate the varying archaeological sensitivity across the Project Site, and the situations under which monitoring may be reduced or discontinued. The CRMTP will describe monitoring protocols for potential Young alluvial-fan deposits in the South Parcel at depths greater than 3 m and extending to the base of excavation, and for areas near the anticipated alignment of the Zanja Madre. Archaeologically relevant sediments may be present at significant depths (greater than 3 m [10 ft]). At a minimum, the Young alluvial-fan deposits should be considered sensitive for buried cultural resources to the base of proposed excavations within the South Parcel.

The CRMTP shall expand upon existing available historic contexts and cultural contexts, focusing on the themes and research questions that demonstrate the significance of the Zanja Madre and other currently unknown cultural resources that may be present. This shall ensure that baseline information required to effectively document the Zanja Madre and/or evaluate the significance of other cultural resources discoveries that could be made during Project activities are in place prior to initiation of construction activities. The CRMTP shall include the professional qualifications required of key staff, monitoring protocols relative to the varying archaeological sensitivity across the Project Site, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements. The CRMTP shall include detailed methods to be taken during stop-work situations, assessment of preservation in place or recovery of potential cultural deposits, and evaluation of resources in terms of CRHR and NRHP eligibility.

The CRMTP shall include specific protocols regarding work in proximity to the exposed sections of the Zanja Madre within the Project Site and the anticipated locations of additional Zanja Madre sections or fragments that may be buried on-site, including protocols for monitoring, recording, photographing, and artifact collection. The protocols detailed in the CRMTP shall include the three elements detailed below, in a manner commensurate with the significance of the Zanja Madre and adequate for recovering and preserving scientifically consequential information provided by the resource. The CRMTP shall require outreach to local Stakeholders. Stakeholders that shall be contacted include, but are not limited to, local historical societies, museums, and subject matter experts. Prior to the issuance of a grading permit, the Applicant shall organize this Stakeholder Committee, subject to the review and approval of the City, to inform the development, execution, and maintenance of a plan for public interpretation and memorialization of the Zanja Madre. This Zanja Madre Interpretation and Memorialization Plan shall be either a standalone document or included as an independent appendix to the CRMTP, prepared by the Applicant, with input from

the Stakeholder Committee, and subject to approval by OHR. .. A copy of the CRMTP shall be provided to OHR once completed.

The Zanja Madre Interpretation and Memorialization Plan may include any or all of the following, or other interpretive measures: (1) removal, preservation, and relocation of an intact section of the Zanja Madre on the Project Site, if feasible; (2) collection and reuse of bricks from the Zanja Madre in an interpretive installation, such as a water feature on the Project Site; (3) delineation of the Zanja Madre's original alignment through decorative elements on pedestrian paths or walls on the Project Site; (4) installation on the Project Site of murals or other public art-work referencing the Zanja Madre and interpreting its historical significance; (5) a scenic overlook at the Project Site for viewing and interpreting the exposed Zanja Madre section on the Metro A Line ROW; and (6) inclusion of the public through educational programs/curricula, virtual interpretive con-tent, and other methods. This protocol requires preconstruction research and design planning to enhance opportunities for interpreting the important culture history of the area.

The CRMTP shall include specific protocols for exposing any intact portions of the Zanja Madre via archaeological excavation, with recovery of important data, such as evidence of the original open-ditch zanja, construction methods, information about associated artifacts, and collection of bricks for public interpretation. This protocol requires preconstruction research and archaeological excavation as well as construction monitoring and treatment of any additional portions of the Zanja Madre encountered during construction.

The CRMTP shall require the preparation of documentation for an appropriate section of intact zanja meeting the provisions of the Historic American Engineering Record (HAER). This process shall expand upon research and fieldwork to expose segments of the Zanja Madre feature. Documentation shall include pertinent narrative records, measured drawings, high-accuracy GPS/geographic information system (GIS) recordation, photographs in conformance with HAER standards, and other appropriate documentation ensuring City Guidelines and best practice standards are met. A copy of the HAER shall be provided to OHR once completed.

In locations where the Zanja Madre is anticipated to extend beyond the Project Site onto other properties, efforts shall be made to prevent damage to the feature at those junctures, ensuring that construction activities will not compromise the feature in adjacent parcels using appropriate construction limits marking and other protective measures as feasible from within approved Project limits.

The CRMTP shall also include protocols for construction monitoring for buried cultural resources for those portions of the Project Site that are sensitive for buried cultural resources. As shown in Appendix A of the Cultural Resource Assessment included as Appendix A to the Draft EIR, these areas include soils from Unit 1 of the Young alluvial-fan deposits and are located within the South Parcel..

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APPENDIX A

Buried-Site-Sensitivity Assessment for the Buena Vista Project, City of Los Angeles, California

Joseph J. El Adli

Geologic Setting

The City of Los Angeles is a sprawling, 1,295-km^2 (500-square-mile) municipality in southern California encompassing portions of the San Fernando Valley, the Los Angeles Basin, and a corridor connecting to the Port of Los Angeles in San Pedro. Several independent cities and unincorporated sections of Los Angeles County are located within the larger boundaries of the City of Los Angeles, including the Cities of Santa Monica, Culver City, and Beverly Hills. The Buena Vista Project (the Project) site is located roughly 0.5 km (0.3 mile) southwest of Dodgers Stadium, in the Chinatown neighborhood of the City of Los Angeles.

At the regional scale, the Project is situated within the Los Angeles Basin, at the northern edge of the Peninsular Ranges geomorphic province and immediately south of the Transverse Ranges geomorphic province (Figure A.1). The terrestrial (i.e., unsubmerged) portion of the Peninsular Ranges Province is characterized by a series of elongated northwest–southeast-trending mountains (Yerkes et al. 1965). These mountain ranges are composed dominantly of plutonic igneous rocks (often granites and granitoids) of Cretaceous age (approximately 120–90 million years ago [Ma]) and older metamorphic rocks of Jurassic to earliest Cretaceous age (approximately 200–140 Ma; Gastil 1975; Krummenacher et al. 1975; Walawender 2000). In the basins and valleys beneath these mountain ranges, these igneous and metamorphic basement rocks are often overlain by sedimentary deposits of late Mesozoic to Cenozoic age (approximately 90 Ma to 10 thousand years ago [ka]; Tweet et al. 2014).

Structurally, the Los Angeles Basin is divided into four major blocks that are bounded and divided by fault zones. The Project is within the Central Block, which is wedge shaped and approximately 80 km (50 miles) in greatest length (northwest–southeast). The sediments of the Central Block are relatively thick, especially at the western base of the Santa Ana Mountains, where sedimentary strata have been estimated at 9,754 m (32,000 feet) in thickness. These sediments are late Cretaceous to Pleistocene in age (approximately 90 Ma–10 ka) and are occasionally interbedded with Miocene volcanics (Yerkes et al. 1965). Strata within the Central Block were laid down in a variety of marine and terrestrial depositional contexts, which has given rise to a rich fossil record for the region.

The Project parcels are located on the Los Angeles, California, 7.5-minute topographic quadrangle (Figure A.2) at an elevation of approximately 91–107 m (300–350 feet) above mean sea level. In the vicinity of the Project, the modern land surface slopes steeply toward the north. The Hollywood Fault, a major tectonic boundary between the Peninsular Ranges and Transverse Ranges Provinces, is 6.1 km (3.8 miles) to the north-northwest of the Project area. Immediately north of this fault lies the easternmost portion of the east–west-trending Santa Monica Mountains.

The current California Geological Survey geologic map of the region (Campbell et al. 2014) shows the Project area within two geologic units: Unit 2 of the Young alluvium (Qya2) and Unit 1 of the Young alluvial-fan deposits (Qyf1; see Figure A.2). These surficial deposits were derived through erosion (often aided by water) of local topographic features and are approximately late Pleistocene in age (more than 10,000 years old; Bedrossian et al. 2012). Sediments of these alluvial deposits consist of friable silts to gravels, which can sometimes preserve portions of the original geomorphology of the alluvial fan (Campbell et al. 2014). The Young alluvium is considered by Campbell et al. (2014) to be late Pleistocene in age, whereas the Young alluvial-fan deposits are slightly younger, with a Holocene to late Pleistocene age. The Miocene–early-Pliocene-age Puente Formation (approximately 15–3.6 Ma; Critelli et al. 1995) is mapped to the immediate north of the northeastern portion of the Project area by Campbell et al. (2014). However, older geologic maps by Dibblee and Ehrenspeck (1989) placed these Miocene deposits within the Project area. The Puente Formation was confirmed to be at the surface within the Project area by a pedestrian field survey conducted by Statistical Research, Inc. (SRI), in March 2022. A geotechnical report produced by Geotechnologies, Inc. (Geotechnologies; 2021), also noted the Puente Formation beneath the alluvial deposits in the northeastern portion of the Project area.

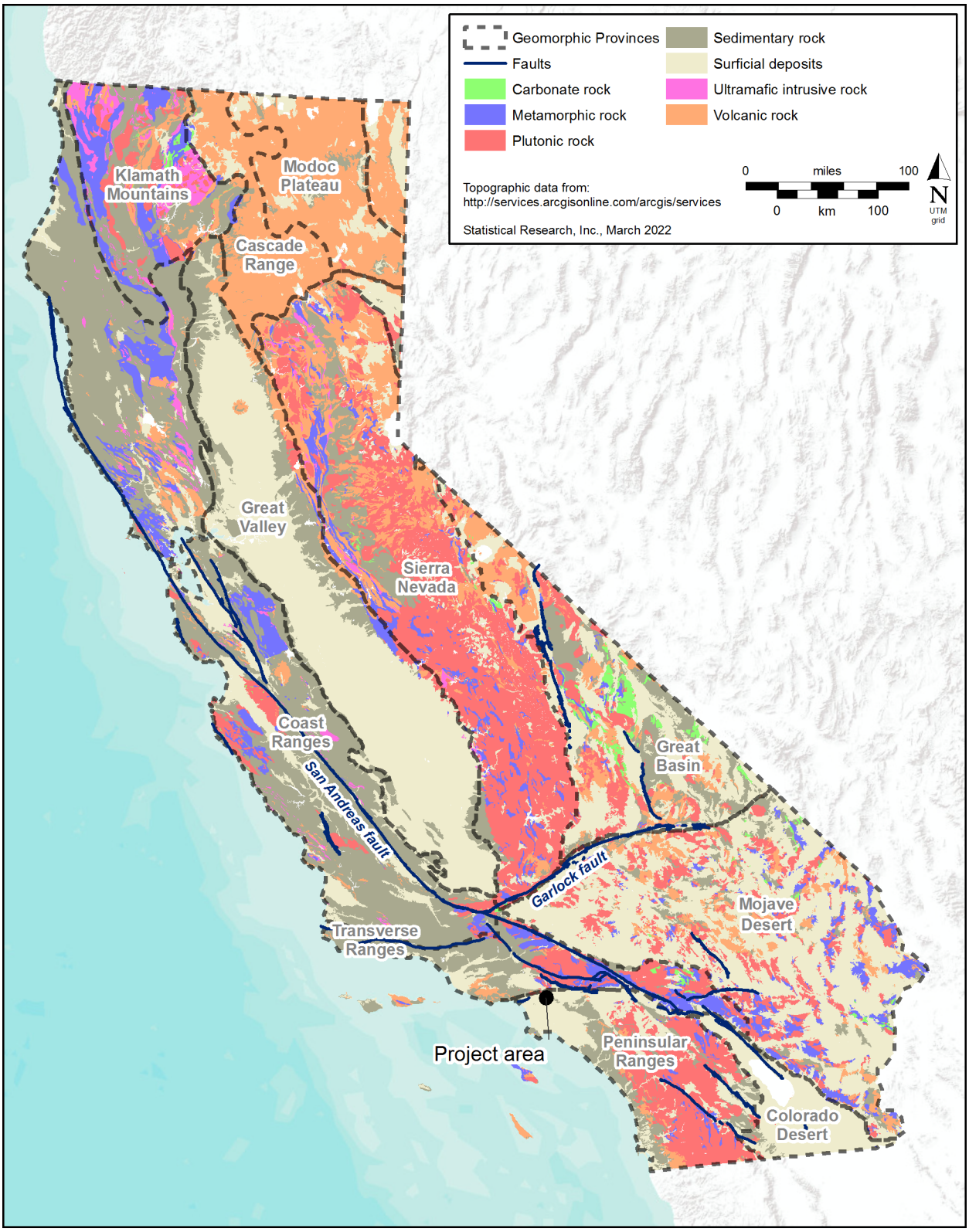

Figure A.1. Geomorphic map.

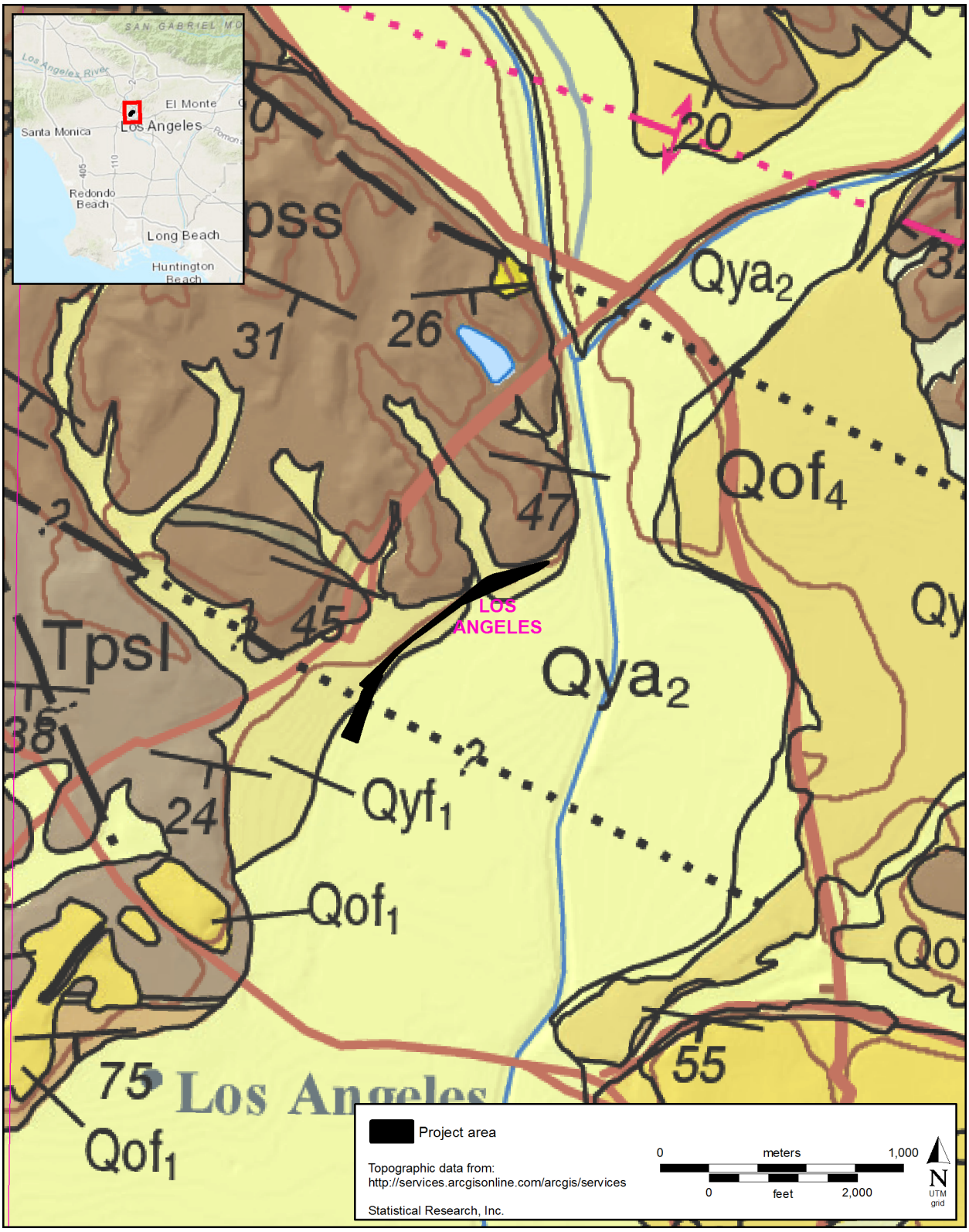

Figure A.2. Geologic map.

Mapped Geologic Units

The current California Geological Survey geologic map of the region (Campbell et al. 2014; see Figure A.2) shows the Project resting on sedimentary units classified as part of the Young alluvium (Qya2) and the Young alluvial-fan deposits (Qyf1). Geotechnical borings by Geotechnologies (2021) and a pedestrian field survey by SRI noted that the Puente Formation also is present within the Project area. The following section provides a general overview of the types of geologic deposits located within the Project area (in order from oldest to youngest).

Puente Formation (Tpss)

A period of accelerated subsidence in the Los Angeles Basin starting in the late Miocene (ca. 11 Ma), coupled with a globally higher sea level, left much of the basin submerged under the Pacific Ocean (Hildenbrand et al. 2001). At that time, large volumes of terrigenous sediments (i.e., derived of material eroded from the land) were deposited in marine basins throughout the Los Angeles region, resulting in strata hundreds to thousands of meters thick. Sediments deposited in marine settings during that time include the Monterey, Modelo, and Puente Formations. Because of the similarities in time of deposition and in depositional setting, these formations have often been confused in the literature and on geologic maps. For example, the Miocene sediments exposed near the Project area were mapped by Dibblee and Ehrenspeck (1989) as sandstones and siltstones of the Monterey Formation (Tmss), and Campbell et al. (2014) mapped them as the unnamed sandstone unit of the Puente Formation (Tpss). Herein, we use the nomenclature of the more-recent Campbell et al. (2014) map, for simplicity.

The Puente Formation is a late Miocene to early Pliocene (ca. 11.6–3.6 million years old) marine unit consisting of siltstones, sandstones, and shales. Sedimentological characteristics, as well as fossil composition, suggest that the Puente Formation represents the deposits of a submarine fan at bathyal-zone depths (Durham and Yerkes 1964). The Puente Formation has been subdivided into four formal members (from oldest to youngest: La Vida, Soquel, Yorba, and Sycamore Canyon), which represent the progradation of the submarine fan (Critelli et al. 1995; Krueger 1936). However, some exposures of the Puente Formation have not been assigned to a formal member throughout regions of the Los Angeles Basin.

Campbell et al. (2014) mapped the Puente Formation immediately to the north of the northeastern portion of the Project area but not within the Project boundary. However, bedrock corresponding to the Puente Formation was encountered at the surface during the pedestrian survey performed by SRI, as well as subsurficially during a geotechnical investigation (Geotechnologies 2021). As mapped by Campbell et al. (2014), these sediments correspond to the late Miocene sandstone component of the Puente Formation, which have not been assigned to a formal member (Lamar 1970). Yerkes et al. (2005) described these sediments as "well-bedded, very fine- to very coarse-grained sandstone; medium to light brown and light gray; mostly well cemented but less so in uppermost parts; local discoidal concretions; most abundant in lower part of formation (Campbell et al. 2014:34)." These sediments were documented by the geotechnical investigation as southwest-dipping, well-bedded yellowish brown, yellow, olive-brown, and gray interbedded sandstones and siltstones. The pedestrian field survey performed by SRI further noted gypsum crystals and concretions within the unit. The Puente Formation was only documented (by both the pedestrian survey and the geotechnical study) in the northeastern portion of the Project area.

Paleontological resources are well known from the Puente Formation and have produced remains of marine mammals, fish, sharks, birds, turtles, invertebrates, and plant material. In support of this Project, paleontologist Dr. Alyssa Bell conducted a search of the paleontological specimen and locality records held by the Vertebrate Paleontology Department of the Natural History Museum of Los Angeles County (NHMLA). On April 21, 2022, Dr. Bell provided a report of her findings. That report is summarized in the Results section below and is provided in full as Attachment A.1.

Dr. Bell found no fossil vertebrate localities within the Puente Formation recorded in the NHMLA paleontology-collection records that are directly within the Project footprint. Nonetheless, she identified

several nearby localities that were found in sedimentary deposits similar to those underlying the Project area. As indicated in the records-search report (see Attachment A.1), these deposits were identified within the Modelo and Monterey Formations. When comparing these localities to the Campbell et al. (2014) geologic map, it appears that they are within the same sediments as those underlying the Project area, as mapped. The fossil localities recovered during the records search included remains of fossil baleen whales (Mysticeti) and boney fish (Osteichthyes).

Alluvial Deposits (Qya2 and Qyf1)

Alluvial fans are cone- or fan-shaped deposits of sediment that form at the boundaries between areas of high and low topography. The detrital sediments of the alluvial fan are transported and deposited by gravity, wind, and (most often) water. Such features are common in mountainous regions of the world, and in tectonically active regions, alluvial fans can reach over 50 km (31 miles) in width and 60 km (37 miles) in length.

Quaternary alluvial deposits are extensively exposed throughout portions of the Los Angeles Basin and encompass most of the nonfill deposits beneath the Project area. These deposits have been subdivided into two units by relative age and geomorphology, based on geomorphic relationships and relative degree of soil formation (Campbell et al. 2014). The oldest of these deposits corresponds to Unit 2 of the Young alluvium (Qya2), which has been assigned a late Pleistocene age. The Young alluvium was mapped by Campbell et al. (2014) within a small portion of the northeastern and southwestern portions of the Project area (see Figure A.2). Yerkes et al. (2005) described this unit as "unconsolidated, generally friable, stream-deposited silt, sand and gravel on canyon floors; surfaces may show slight to moderate pedogenic soil development (Campbell et al. 2014:7)."

The youngest and most extensive nonfill unit within the Project area is Unit 1 of the Young alluvial-fan deposits (Qyf1). This unit was assigned a Holocene to late Pleistocene age by Campbell et al. (2014) and Yerkes et al. (2005). As mapped, the Young alluvial-fan deposits are exposed throughout much of the northeastern, central, and southwestern portions of the Project area. Yerkes et al. (2005) described the Young alluvial-fan deposits as "unconsolidated gravel, sand and silt, bouldery near mountain fronts; deposited chiefly from flooding streams and debris flows; surfaces can show slight to moderate pedogenic soil development (Campbell et al. 2014:7)."

The general character of the alluvial deposits underlying the Project site was discussed in the geotechnical report produced by Geotechnologies (2021). They recorded the composition and depth of sedimentological units observed under the Project area, resulting in a detailed stratigraphic cross section. The report produced by Geotechnologies (2021) did not distinguish between the Young alluvium and Young alluvial-fan deposits, as was done by Campbell et al. (2014). Instead, those authors consolidated the alluvium into a singular Quaternary alluvium unit (Qa) following the mapping of Dibblee and Ehrenspeck (1989). The alluvium encountered during the geotechnical investigation was described as dense to very dense dark brown, yellowish brown, and grayish brown sands and gravelly sands with a minor component of silty sands and clayey sands. The alluvium was determined to be thickest in the southwestern portion of the Project area, where bore holes did not reach the base of the alluvium at a depth of 21 m (70 feet) below the surface. In the northeastern portion of the Project area, the alluvium ranged in thickness from 0 to 11 m (from 0 to 37.5 feet) and was often underlain by the Puente Formation.

Paleontologically significant finds of well-preserved large-bodied land mammals have been found within the Pleistocene alluvial deposits throughout Los Angeles County, as well as in nearby Orange and Riverside Counties (Jefferson 1991). These deposits have yielded remains of mammoths, mastodons, camels, bison, ground sloths, dire wolves, and American lions, among others. Plant remains, terrestrial invertebrates, and microfossils (especially micromammals) also have been found within similar deposits throughout the Los Angeles Basin (Miller 1971). However, both the Young alluvial deposits (Qya2) and the Young alluvial-fan deposits (Qyf1) may be too young to have produced significant paleontological resources near the surface, especially where these units are Holocene in age. Therefore, all fossil localities recovered by

the NHMLA paleontological records search are within significantly older alluvial deposits, such as the late–middle Pleistocene Old alluvial-fan deposits (Qoa4).

Artificial Fill

Artificial fill materials are likely present immediately below the Project area. These sediments often range in grain size from silt to gravel and are generally poorly sorted. Such deposits are derived from previous construction activities and are thus not naturally forming. The geotechnical report for the Project documented the fill within the Project area as a dark-brown, reddish brown, and light-gray silty sand containing construction debris (Geotechnologies 2021). The fill was dense to moderately dense and was moist where observed. Fill within the southern portions of the Project area range in thickness from 0.6 to 2.4 m (from 2.0 to 8.0 feet), whereas in the northern portions of the Project area, that fill was exceptionally variable in thickness, ranging from 0.1 to 9.1 m (from 0.5 to 30.0 feet) in thickness. The thickest portions of the fill were noted near the intersection of Solano Street and North Broadway (previously Buena Vista Street) in association with an unpaved terrace. Because of the nature of how the artificial fill sediments were deposited, these units do not contain cultural or paleontological resources in their original context.

Mapped Soil Units

Soil Survey Geographic Database (SSURGO) soil-survey data reported a consociation of four soil units from three soil series and one soil order (Figure A.3). Such consociations are generally composed of multiple soil units but are often dominated by a single soil type to the extent that the less-common soils series are rarely observed. Therefore, the soil descriptions below focus primarily on the predominant soil series, because it makes up a significant majority of the mapped area underlying the Project area. A more-detailed breakdown of the soil composition of mapped soil units is provided in Table A.1, and a detailed description of each soil series is provided in Attachment A.2.

The SSURGO soil survey reported a single consociation of soils within the Project area, which was designated as "Urban land, commercial, 0 to 5 percent slopes." This consociation is reported to be composed of approximately 90 percent Urban Land and 10 percent land composed of three other soil series. The Urban Land designation within this consociation indicates that the area has either been heavily disturbed by recent construction, so that no intact surficial soils are present, or that the soils are currently covered by existing infrastructure. Such units should be considered as incomplete data within a soils map. The pedestrian survey of the Project area performed by SRI similarly did not encounter any intact soils within the Project area.

The remaining soils associated with the Urban Land, commercial, 0–5 percent slopes consociation were all in the soil order of Entisols. Entisols are soils that form in a generally aridic soil-moisture regime and do not have a subsurface horizon (Soil Survey Staff 2014). These soils have an A horizon over pedogenically unaltered parent material (C horizon)—most commonly, stratified alluvium or aeolian sand. Entisols are generally considered to be "young" soils and are typically associated with deposits that aggraded during the latter half of the Holocene. Within the Project area, the SSURGO mapped primarily Typic Xerorthents with a much lower concentration of the Hueneme and San Emigdio soil series. All these soils represent weakly developed Entisols that develop on recently abandoned late Holocene and active or recently active alluvial fans and, to a lesser extent, stream terraces. These soils have developed in human-transported materials over stratified gravels and sandy alluvium derived from mixed granitic and sedimentary rock types.

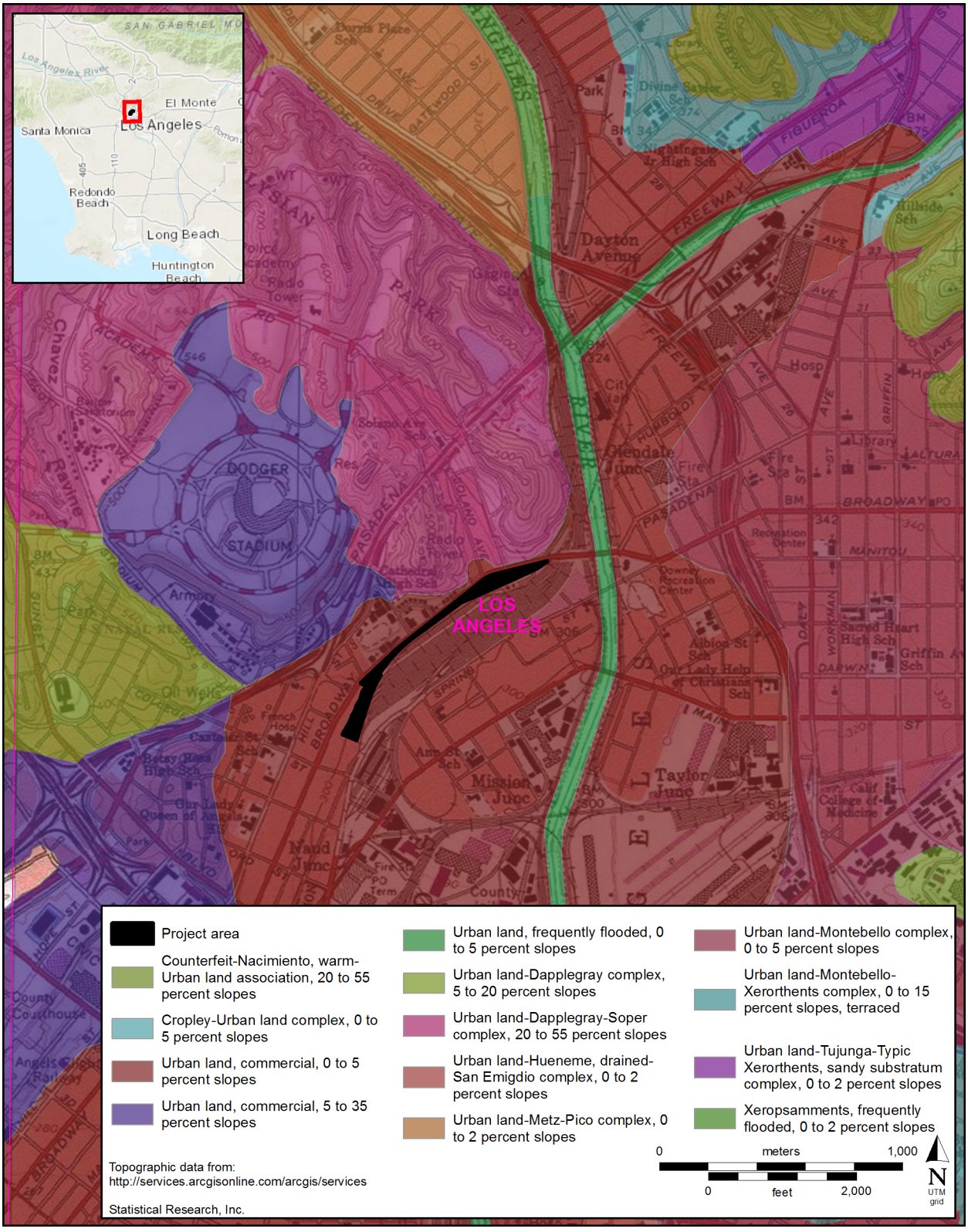

Figure A.3. SSURGO soils map.

Table A.1. SSURGO Map-Unit Composition

Soil Series, by Soil Consociation	Percentage of Soil Consociation
Urban land, commercial, 0–5 percent slopes	
Urban Land[a]	90
Typic Xerorthents	8
Hueneme	1
San Emigdio	1

[a] Dominant soil series.

Methods

Project Personnel and Qualifications

The research and analysis reported in this document were conducted by SRI's Joseph J. El Adli, Ph.D., a qualified paleontologist and geologist meeting the Society of Vertebrate Paleontology criteria for a Project Paleontologist/Principal Investigator and with extensive experience in southern California.

Buried-Site-Sensitivity Modeling

The basic theoretical concept of buried-site-sensitivity models (BSSMs) is based on the relationship between landform age and the accepted dates of human habitation in North America. Put simply, buried archaeological resources do not exist below landforms that developed before the colonization of the continent, which, according to our present understanding, occurred sometime during the latest Pleistocene (ca. 15 ka). With this concept as a methodological framework, the first step in BSSM construction is to distinguish relict Pleistocene landforms (nonsensitive) from those that aggraded coevally with potential human habitation (sensitive). Although most latest Pleistocene through Holocene (ca. 15 ka to recent) landforms are considered sensitive for buried archaeological resources, it is important to note that discrepancies will exist between the "geologic potential" for and the actual "probability" of buried archaeology (Meyer et al. 2010; Onken et al. 2015). Whereas geologic potential is based simply on relative landform age (i.e., young surfaces have higher sensitivity than older surfaces), the probability of finding buried sites is dependent on other environmental factors, including slope gradient, the depositional environment of the sediments underlying the landform (lower-energy deposits have greater potential for intact archaeology than higher-energy sediments), the presence or absence of buried soils within the planned depth of disturbance, proximity to water, and proximity to known surficial archaeological sites.

The development of this simplified BSSM for the Project area involved collection of geologic data from sources such as government agencies and scientific journals. A more-in-depth and -complete BSSM would further include environmental and cultural data, such as cultural resource management reports, review of as-built construction plans and geotechnical reports, aerial photographs, and analysis of known archaeological site records for areas within and around the Project area. From the utilized data sources, we were able to assess the approximate ages and origins of the geologic deposits and soils within the Project area; that work, in turn, allowed us to separate the local landforms into sensitive (latest Pleistocene through Holocene) and nonsensitive (older than latest Pleistocene) categories. Generally, landforms considered sensitive for buried archaeology would then be further subdivided into categories of moderate, high, and very

high sensitivity based on other environmental and cultural criteria—namely, proximity to previously recorded archaeological sites identified via records searches.

Inaccuracies in BSSMs are most commonly related to the limitations inherent in soil and geologic maps, which, in most instances, form the foundation of a BSSM. Map scale and the generalizations used to define mapping units are the most common sources of error (Holliday 2004). The BSSM presented here is based largely on preexisting geologic maps obtained from the U.S. Geological Survey and the California Geological Survey. Soils maps from the U.S. Department of Agriculture Natural Resources Conservation Service and other published records also were used.

Landform age within the Project area was determined by examining the geomorphic surface characteristics visible in high-resolution satellite imagery and analyzing geologic and soil-survey maps (Soil Survey Staff 1999). The soil taxonomic classification for each of the soil series provided information on relative soil age and the soil-forming environment. Soils are considered a relative-age indicator, because soil development is time dependent (Birkeland 1999; Holliday 2004; Jenny 1941). Older landforms have well-developed (if not severely eroded) soils with diagnostic subsurface horizons (B horizons), whereas younger landforms have weakly developed soils with simple A–C horizonation (no B horizon).

Results of the Buried-Sites-Sensitivity Modeling

The soils, landforms, and geologic units within the Project area have been classified as either sensitive or nonsensitive for intact buried archaeological resources on the basis of age and geologic context. As applicable, sensitive areas have been further subdivided into moderate, high, and very high sensitivity based on multiple parameters, including soil type and level of disturbance as revealed in historical aerial photographs and as-built construction plans. Combined, these variables provide a BSSM including nonsensitive areas as well as moderate- and high-sensitivity areas (Figure A.4).

Nonsensitive Areas

Portions of the Project area are underlain by landforms, sediments, and other geologic units significantly older than the latest Pleistocene (Table A.2). These include areas underlain by the Miocene Puente Formation (Tpss) and the Unit 2 of the Young alluvium (Qya2). These geologic units predate the accepted dates of human occupation on the North American continent and therefore are generally not considered to be sensitive for buried archaeological resources. This includes much of the northeastern portion of the Project area, where the Puente Formation was noted during the field survey. Often overlapping with areas underlain by older geologic units, other portions of the Project area are in a depositional setting with too-high energy to preserve intact archaeological resources, such as areas along slopes of greater than 25° from horizontal (approximately the angle of repose for sandy gravels [Al-Hashemi and Al-Amoudi 2018]). This includes a significant part of the central portion of the Project area as well as the northeastern portion of the Project area.

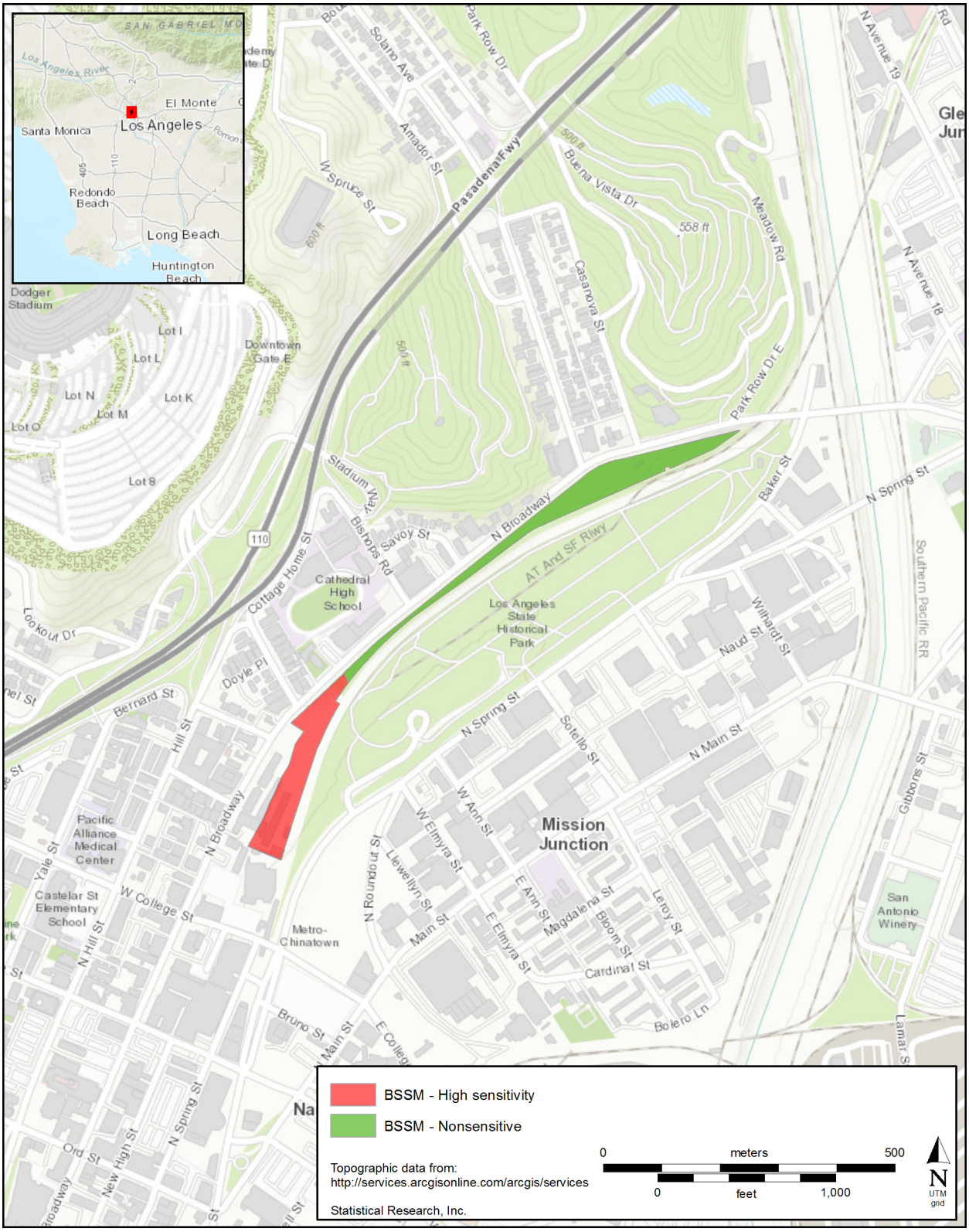

Figure A.4. BSSM map.

Table A.2. Geologic Units Mapped within the Project Area

Geologic Unit	Map Symbol	Age
Young alluvial-fan deposits, Unit 1	Qyf1	Holocene to late Pleistocene
Young alluvium, Unit 2	Qya2	late Pleistocene
Puente Formation	Tpss	late Miocene to early Pliocene

Note: Sensu Campbell et al. (2014).

Sensitive Areas

The locations considered sensitive for buried archaeological resources include Holocene to latest Pleistocene alluvial deposits. The sediments underlying these landforms accumulated while humans may have been present on the landscape, and given the depositional environment associated with these sediments, it is unlikely that buried archaeological sites would have been significantly impacted during aggradation events. It is also probable that many of these areas contain buried soils that mark significant periods of nondeposition in the stratigraphic record. Buried soils typically have significant potential for archaeology because they represent former stable land surfaces that would have been available for human occupation for long periods (long enough for a soil to develop). All the areas of the Project area in which late Pleistocene to Holocene sediments and soils are present in low-energy depositional settings are considered sensitive, including Unit 1 of the Young alluvial-fan deposits.

The geotechnical report produced by Geotechnologies (2021), as well as logs downloaded from the State of California Department of Water Resources (data from the Well Completion Report Map Application, https://www.arcgis.com/apps/webappviewer/index.html?id=181078580a214c0986e2da28f8623b37, accessed April 12, 2020), were used to estimate the thickness of the sensitive alluvial-fan deposits near the base of the surrounding hills and within the Project area. No well logs were documented directly within the Project area. However, multiple well logs were noted for wells in the Project's vicinity, including one near Los Angeles Historic Park (Well Completion Report No. 01S13W22). However, none of the well-log reports provided detailed information on the underlying geology within the area; therefore, none was useful for the purposes of this report. The geotechnical report was able to determine the extent of the alluvium within the Project area (although it did not distinguish between Qya2 and Qyf1) and where it contacted the overlying fill and the underlying Puente Formation. In portions of the site where sensitive geologic units are exposed, the alluvium extends to greater than 21 m (70 feet) below the current grade, and the contact between the alluvium and the Puente Formation was not encountered. Where noted, the artificial-fill deposits overlying the alluvium were approximately 0.6–2.4 m (2–8 feet) thick in sensitive areas and were variable in thickness across the landscape.

The Typic Xerorthents and both the Hueneme and San Emigdio soil series are generally assigned high sensitivity for buried archaeological resources. These soils have relatively simple A–C soil profiles and lack distinct B horizons. Broadly, greater differentiation of soil horizons is indicative of extended surficial exposure. Longer surface exposure means less geologic time in which a record of human occupation could conceivably exist beneath the surficially mapped soils (meaning it is less likely that buried soils would be of appropriate age to contain cultural resources). Conversely, because the probability of accumulating and preserving archaeological resources is inextricably linked to the duration that a surface is exposed, these less-differentiated soil units are less likely to preserve surficial archaeological resources. Based on the soil-series descriptions, these soils are approximately 1.8 m (6 feet) in thickness and have potential to contain buried archaeological resources to their bases. However, it cannot be ruled out that early prehistoric sites could be present at greater depths in unknown buried soils. Areas sensitive for buried archaeological resources include

the southwestern portion of the Project area in the South Parcel, especially areas associated with the construction of Building 2. Based on the current proposed depths of excavation, Project construction within the southwestern portion of the Project area may encounter buried soils containing intact cultural deposits.

Conclusions of the Buried-Sites-Sensitivity Assessment

A simplified buried-site-sensitivity assessment was conducted for the Project area, using available geologic, soils, topographic, and well-log data. That analysis determined that the Project area is underlain by a variety of Cenozoic deposits, several of which are too old to contain buried cultural resources (i.e., the Puente Formation and Unit 2 of the Young alluvial deposits). Furthermore, the steep slopes of the central and northeastern portions of the Project area are not conducive to the preservation of intact buried cultural resources. Therefore, only portions of the South Parcel were determined to be sensitive for buried cultural resources. The types of soils built on the sensitive Unit 1 of the Young alluvial-fan deposits are typically considered of high sensitivity to buried archaeological resources. Artificial-fill deposits overlie the Young alluvial-fan deposits to depths between 0.6 and 2.4 m (between 2 and 8 feet) below the surface within sensitive areas of the Project area. Proposed construction depths during excavations for the three parking levels associated with Building 2 in the South Parcel would extend below the fill and impact soils and sediments with high sensitivity for containing buried cultural resources. The maximum depth at which buried archaeological resources could be expected beneath these portions of the Project area is currently unknown. However, the geotechnical report produced for the Project (Geotechnologies 2021) indicated that the Young alluvial-fan deposits are relatively thick (greater than 21 m [70 feet]) within the South Parcel of the Project area. Coupled with the generally high deposition rate of alluvial fans along mountain margins, archaeologically relevant sediments may be present at significant depths (greater than 3 m [10 feet]). Therefore, the Young alluvial-fan deposits should be considered sensitive for buried cultural resources to the base of the proposed excavations within the South Parcel.

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APPENDIX B

Ground-Penetrating Radar Studies at Buena Vista, Los Angeles, California

Jennie O. Sturm

Introduction

As part of the Buena Vista Project (the Project), ground-penetrating radar (GPR) was used to identify and map potential buried features throughout the Project area in Los Angeles, California. Of particular interest was to test for the presence of the Zanja Madre, a small portion of which is exposed in the southern part of the Project area and was hypothesized to continue northward through other parts of the Project area (Figures B.1–B.3). Because of the nature of the built environment within the Project parcels, which include both highly sloped terraces and extensive parking lots, it was unclear how much of the Zanja Madre still existed or was intact. The GPR surveys were therefore designed with two objectives: (1) to test for the presence of the Zanja Madre by following its exposed location northward, where it is no longer visible, and, (2) if present, to determine the location, extent, depth, and intactness of the Zanja Madre within the Project area's boundaries.

Dozens of GPR transects and one grid measuring 71 by 22 m were collected in Area 1 with the explicit goal of testing the Zanja Madre. Two additional transects were collected in the northern part of the Project area (Area 7) to test a mortared brick fragment exposed in the slope. Finally, though not related to the Zanja Madre, one grid measuring 15 by 30 m was collected in the Area 1 parking lot where rail trackways are present. The goal of that grid was to test for potential buried rail trackways following the pedestrian survey by Statistical Research, Inc. (SRI). In total, the amount of coverage by GPR survey was approximately 2,166 m^2. The GPR data were collected March 14–16, 2022, by SRI's Geophysics Program Director Dr. Jennie Sturm. SRI Crew Lead Cynthia Barrientos assisted with the survey. Our surveys were successful at mapping a likely portion of the Zanja Madre and in tracing its extent north of its exposed location. Overall, these GPR surveys represent an important step in helping to locate and identify portions of the Zanja Madre so that the full extent and importance of this area can be better understood and appropriate planning and management decisions can be made.

GPR: Method and Principles

GPR data are acquired by transmitting pulses of radar energy into the ground from a surface antenna; reflecting the energy off buried objects, features, or bedding contacts in the soil; and then detecting the reflected waves back at the ground surface with a receiving antenna. When collecting radar reflection data, surface radar antennae are moved along the ground in transects, typically within a surveyed grid, and a large number of subsurface reflections are collected along each line. As radar energy moves through various materials, the velocity of the waves will change depending on the physical and chemical properties of the material through which they are traveling (Conyers 2013). The greater the contrast in the electrical and magnetic properties between two materials at an interface, the stronger the reflected signal and therefore the greater the amplitude of the reflected waves (Conyers 2013). When the travel times of energy pulses are measured and their velocities through the ground are known, distance (or depth in the ground) can be accurately measured (Conyers and Lucius 1996). Each time a radar pulse traverses a material with a different composition or water saturation, the velocity will change, and a portion of the radar energy will reflect back to the surface and be recorded. The remaining energy will continue to pass into the ground to be further reflected, until it finally dissipates with depth.

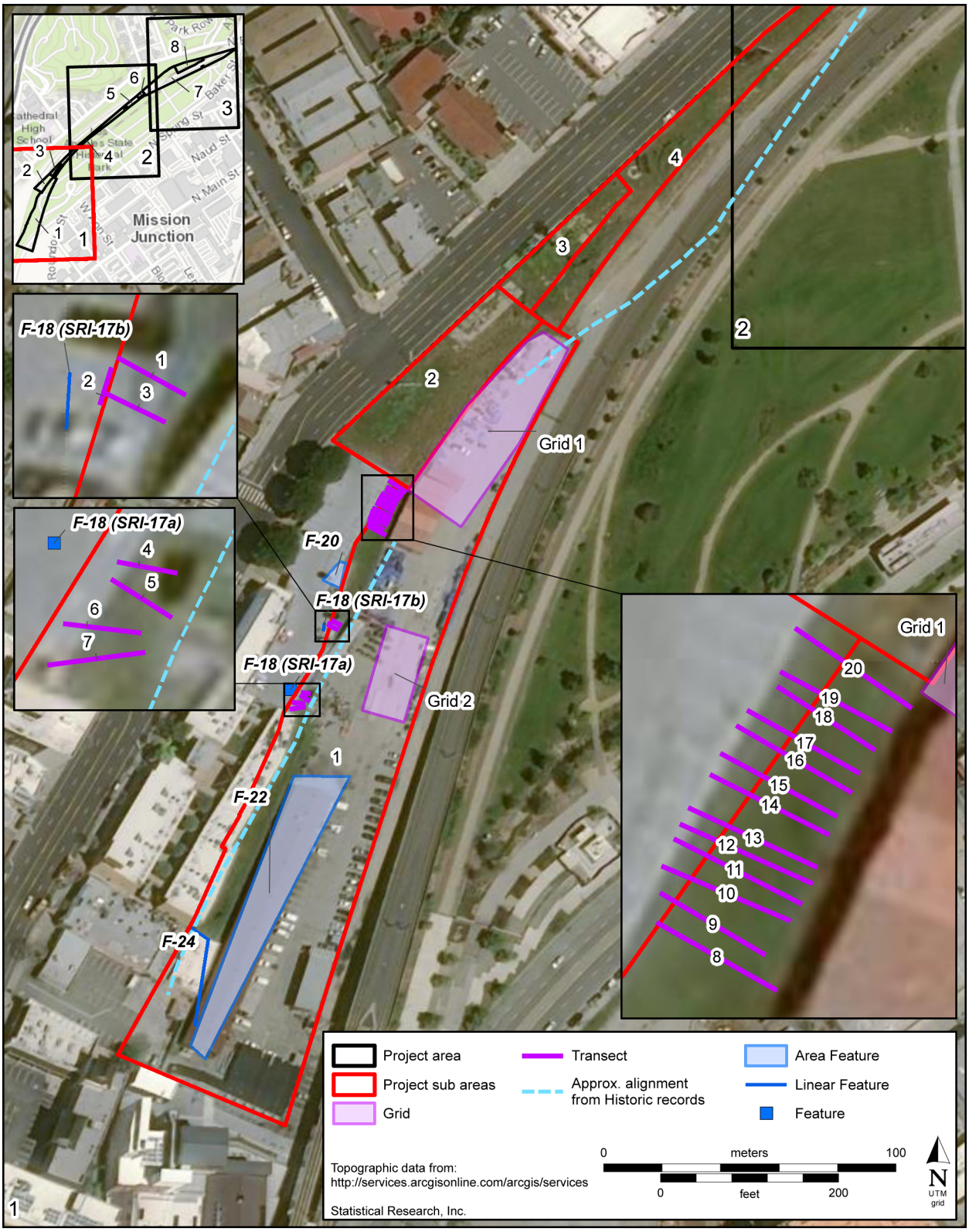

Figure B.1. Overview map of the project area, with SRI Areas 1–7 labeled, the area of exposed Zanja Madre labeled, and the GPR grids and transects drawn on and labeled (Map 1 of 3).

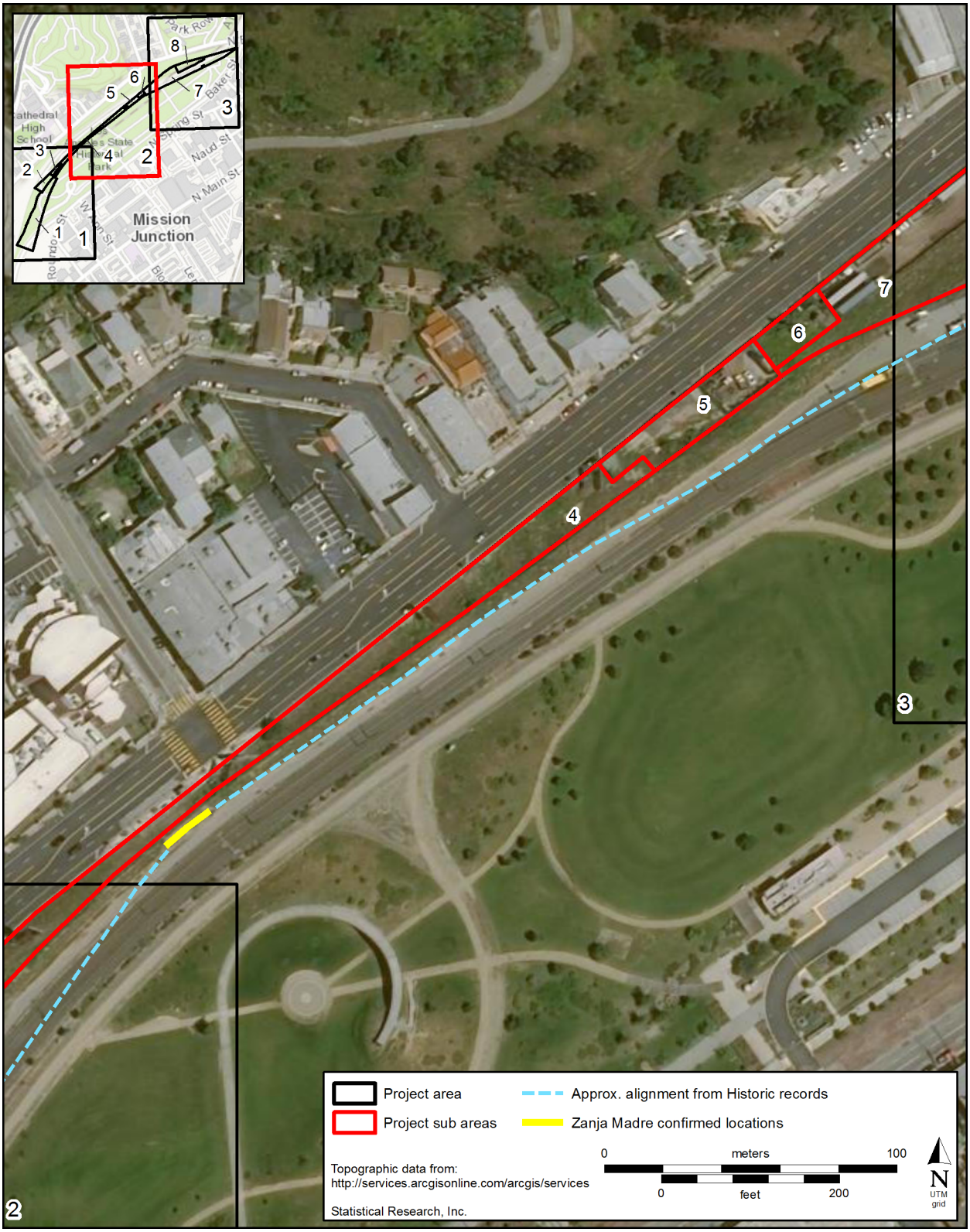

Figure B.2. Overview map of the project area, with SRI Areas 1–7 labeled, the area of exposed Zanja Madre labeled, and the GPR grids and transects drawn on and labeled (Map 2 of 3).

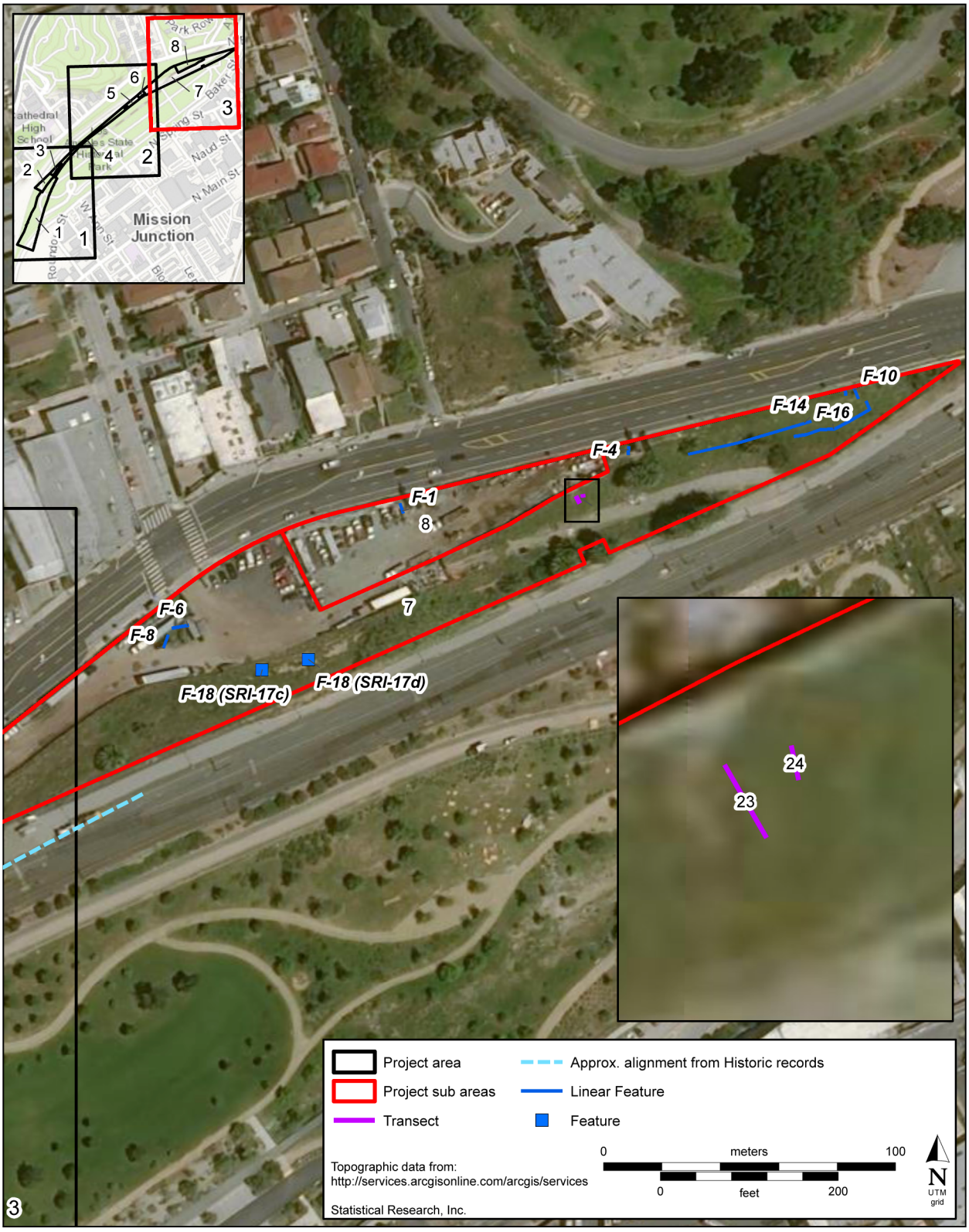

Figure B.3. Overview map of the project area, with SRI Areas 1–7 labeled, the area of exposed Zanja Madre labeled, and the GPR grids and transects drawn on and labeled (Map 3 of 3).

The depths to which radar energy can penetrate, as well as the amount of resolution that can be expected in subsurface deposits, are partially controlled by the frequency (and therefore the wavelength) of the radar energy that is being transmitted (Conyers 2013). Standard GPR antennae propagate radar energy that varies in frequency from about 10 MHz to 1,000 MHz. Low-frequency antennae (10–120 MHz) generate long-wavelength radar energy that can penetrate up to 50 m (164 feet) below surface in certain conditions but are capable of resolving only very large buried features. In contrast, the maximum depth of penetration of a 900-MHz antenna is about 1 m (3.3 feet) or less in typical materials, but its generated reflections can resolve features with a maximum dimension of a few centimeters or inches. A tradeoff therefore exists between the depth of penetration and subsurface resolution. In this survey, a 400-MHz antenna was used, which is considered a mid-range frequency and is commonly used in archaeological applications. In suitable environmental settings, this antenna frequency generally resolves features as small as about 10 cm (4 inches) up to about 2–3 m (6–9 feet) in depth.

The success of GPR surveys in archaeological investigations is largely dependent on soil and sediment mineralogy, clay content, ground moisture, depth of burial, and surface topography and vegetation. Electrically conductive or highly magnetic materials will quickly attenuate radar energy and prevent its transmission to a considerable depth. The best conditions for energy propagation are therefore relatively flat surfaces without an abundance of vegetation and dry sediments and soils. In this Project, the dry sediments along the slope of Area 1 proved to be an excellent medium for GPR energy transmission, and features were readily mapped up to the point of attenuation. The parking lot of Area 1 was also highly suitable for GPR survey, providing a flat and unobstructed area for mapping. Other sections of the Project area, however, were far too steep and vegetated to safely or effectively collect GPR data. If features of potential cultural interest are present beneath these steep slopes, we would not have been able to survey for them.

GPR Field Methods

The GPR data were collected using a Geophysical Survey Systems, Inc. (GSSI), SIR-3000 collection system with a 400-MHz dipole antenna and an attached survey wheel. Prior to data collection, the equipment was calibrated to make sure optimum data were being collected. Sampling density was set at 40 scans/meter, with high-pass and low-pass filters set at 200 and 800 MHz, respectively. The relatively gentle slope in the area immediately north of the exposed portion of the Zanja Madre and the flat parking-lot surfaces in Area 1 meant that the antenna was able to maintain good contact with the ground surface, and good energy propagation was achieved to depth.

To develop a set of expectations for how the Zanja Madre would be mapped in the GPR data, we began by collecting several transects over the two exposed portions of the Zanja Madre. This allowed us to understand the geophysical signature for this feature, which aided in identifying it in areas where it is not exposed (Figure B.4).

Once a geophysical signature had been established for the Zanja Madre, multiple transects were collected along the slope immediately to the north of the exposed portion, up to the fence that borders Areas 1 and 2. All transects were collected starting at the base of the slope and moving upward. Our preliminary analysis from reviewing the data each evening suggested that the Zanja Madre may bend slightly to the east and continue under the parking lot adjacent to the slope. That hypothesis also was supported by the results from SRI's pedestrian survey, which proposed a layout for the Zanja Madre that linked the exposed portion within the Project area to an exposed portion outside the Project area. In the hypothesized layout, the Zanja Madre would have to cross the parking lot in the northeastern section of Area 1. To test this idea, we collected a 71-by-22-m grid in the parking lot, sized to maximize the amount of open surface. Transects in the grid were collected every 1 m. A zigzag collection strategy was used to optimize field time.

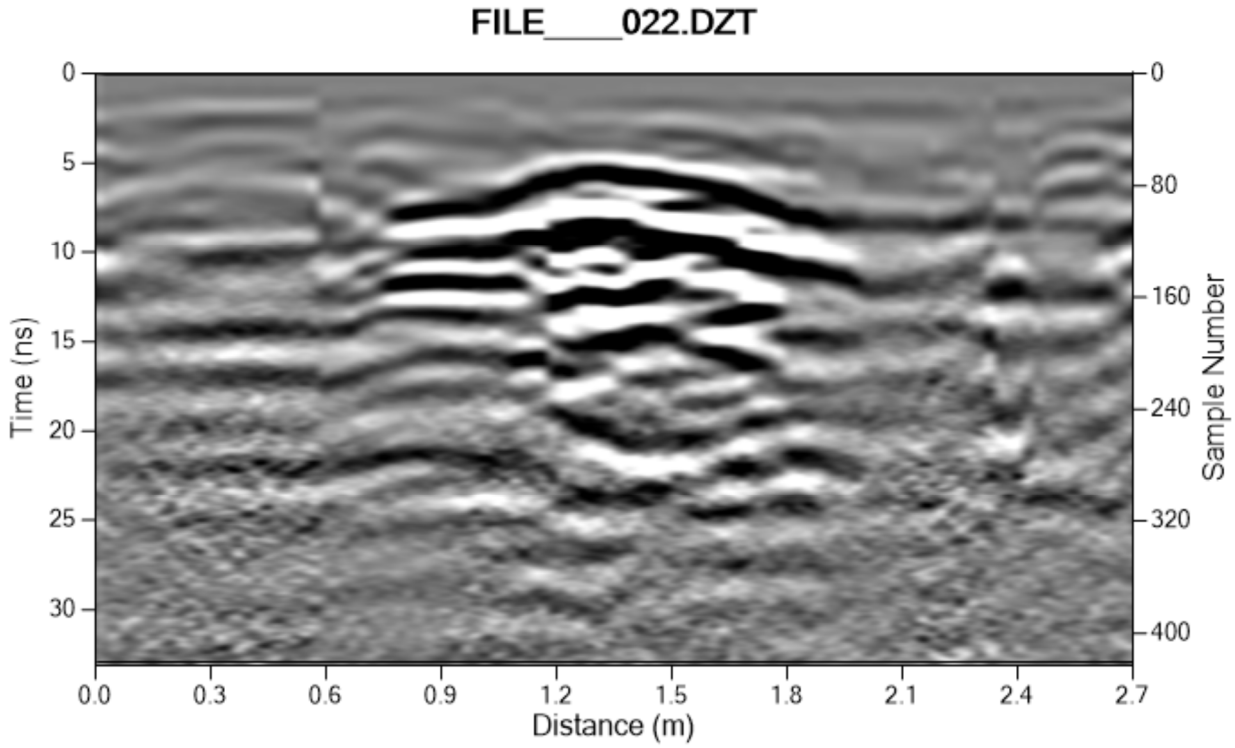

Figure B.4. GPR reflection profile collected over an exposed portion of the Zanja Madre, showing its geophysical signature. The width appears slightly exaggerated because of the slope angle at which the GPR transect was collected.

The "time window" within which all the GPR data were gathered was 40 nanoseconds (ns), which is the time during which the system is "listening" for returning reflections from within the ground. The greater the time window, the deeper the system can potentially record reflections up to the point of attenuation. To convert time in nanoseconds to depth, it was necessary to determine the elapsed time that transpired for the radar energy to be transmitted and reflected back to and recorded at the surface, by doing a velocity test. For this Project, this was done using the program GPRViewer+, in which hyperbolae found in reflection profiles are measured to yield a relative dielectric permittivity (RDP), which is a way to calculate velocity. The shape of the hyperbolae generated in this program is a function of the speed at which energy moves in the ground and can therefore be used to calculate velocity (Conyers 2013). For the Project area, the RDP is approximately 7, which, when converted to one-way travel time (the time it takes the energy to reach a reflection source), is approximately 5.7 cm/ns. All processed maps were converted from time in nanoseconds to depth in meters and feet using this average velocity. The overall depth penetration achieved in this survey was approximately 2.3 m (about 7.5 feet). Although the features of interest to this Project were easily mapped within that depth range, if any additional features are present below this depth, we would not have mapped them.

Data Processing

GPR data were processed using the programs GPRViewer+ and GPR-SLICE. The initial data processing for this Project involved the generation of amplitude slice maps (Conyers 2013; Goodman and Piro 2013). Amplitude slice maps are three-dimensional tools for viewing differences in reflected amplitudes across a given surface at various depths. Reflected radar amplitudes are of interest because they measure the degree

of physical and chemical differences in the buried materials. Strong, or high-amplitude, reflections often indicate denser or different buried materials, such as those potentially related to archaeological features. Amplitude slice maps are generated through the comparison of the reflected amplitudes of the reflections recorded in vertical profiles. In this method, amplitude variations, recorded as digital values, are analyzed at each location in a grid of many profiles where there is a reflection recorded. The amplitudes of all traces are compared to the amplitudes of all nearby traces along each profile. This database can then be "sliced" horizontally and displayed to show the variations in reflection amplitudes at a sequence of depths in the ground. The result is a map that shows amplitudes in map view but also at specific depths. Often when this is done, changes in the soil related to disturbances such as archaeological or geological features can become visible, making many features visible to the human eye that may not be visible in individual profiles.

In addition to the amplitude slice maps, analyzing the two-dimensional vertical reflection profiles adds immense value to interpretations. These two-dimensional reflection profiles show the geometry of reflections, which can lead to insights into whether the radar energy is reflecting from a flat layer (seen as a distinct band on a profile and often called a planar reflection) or a single object or linear feature (often seen as a hyperbola in profile and often referred to as a hyperbolic reflection). These are important when the hypothesized features of interest are small, subtle, or complex in the amplitude slice maps and require further delineation. That was the case for the Project area, where reflections from extraneous debris scattered throughout the slope in Area 1 had to be distinguished from the Zanja Madre. Analyzing the reflection profiles helped to determine the nature of some of those reflections. Reflection profiles are also crucial for analysis in areas where amplitude slice maps cannot be generated.

To do this type of reflection-profile analysis, individual profiles were displayed, corrected for depth, and processed to filter out background noise and enhance amplitudes, using the programs GPRViewer+ and GPR-SLICE. Using these profiles, both individually and in combination with the three-dimensional amplitude slice maps, features of potential cultural interest were then delineated within the GPR-survey areas.

Survey Results and Data Interpretation

Zanja Madre

Acquiring a geophysical signature for the Zanja Madre by collecting GPR transects over an exposed portion (see Figure B.4) greatly aided our ability to identify the Zanja Madre in subsequent profiles (Figure B.5). This was a particularly useful approach given the large amount of debris within the slope that produced extraneous reflections in the GPR data. Each profile was analyzed for the Zanja Madre reflection and measured for its spatial location and depth. In light of this analysis, it appears that the Zanja Madre is located near the base of the slope over several GPR profiles and progressively curves to the northeast. The zanja appears to get progressively deeper as it moves to the northeast, from about 20 cm (8 inches) to just over 50 cm (20 inches). If it continued on the trajectory identified in the GPR profiles, then it likely originally crossed where the current parking lot is located. This occurs several meters south of the Area 2 fence and by about GPR Profile 16 (see Figures B.1–B.3).

The analysis of the GPR data collected in the parking lot does suggest that there may be portions of a linear feature present. As seen in the amplitude slice maps, an expanse of high-amplitude reflections borders the western edge of the grid, directly next to the fence of Area 2 (Figure B.6). These reflections first appear in the southwestern corner of the grid, and they become more expansive as they move north. The overall spatial patterning and geometry of these reflections is linear with a slight curve toward the northeast. This matches the path of the Zanja Madre as identified in the profiles collected on the slope to the south. It is clear from the amplitude slice maps, however, that these reflections are not continuous. This suggests that if these do relate to the Zanja Madre, this feature is not contiguous or likely intact under the parking lot. What are being mapped by the GPR likely are sections or debris related to the original feature that may still be close to their original locations.

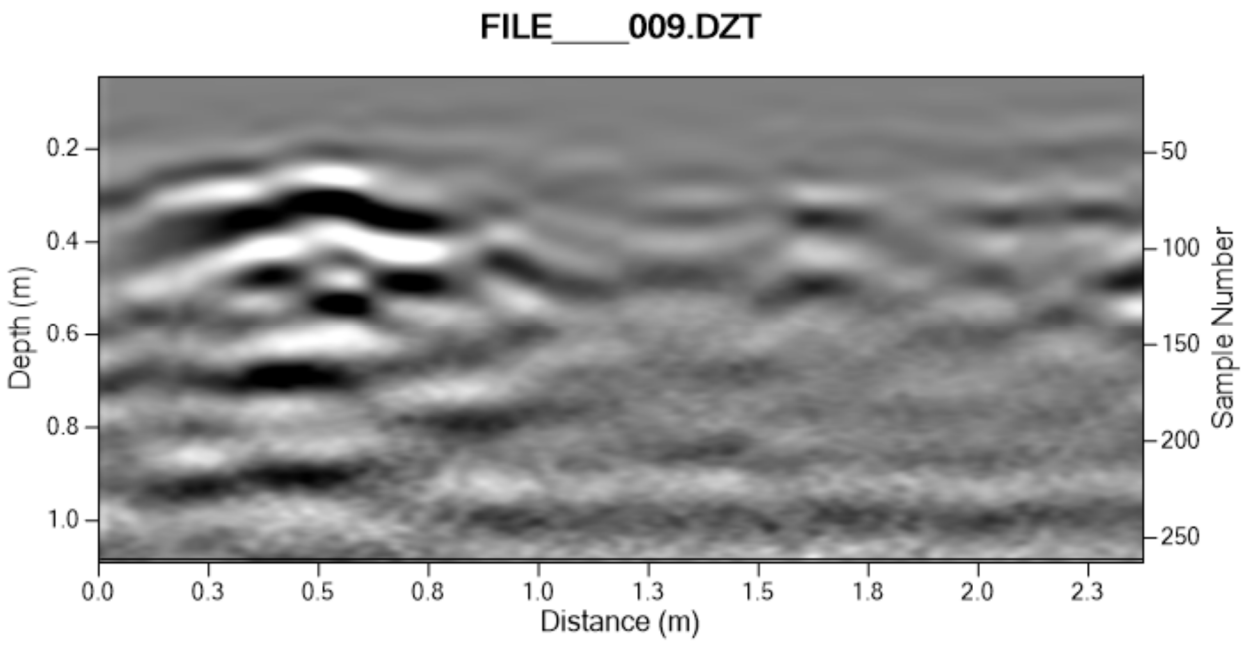

Figure B.5. GPR reflection profile collected along the slope to the north of the exposed Zanja Madre. The reflection from a buried portion of the zanja is seen in the beginning of this profile, beginning at a depth of about 24 cm.

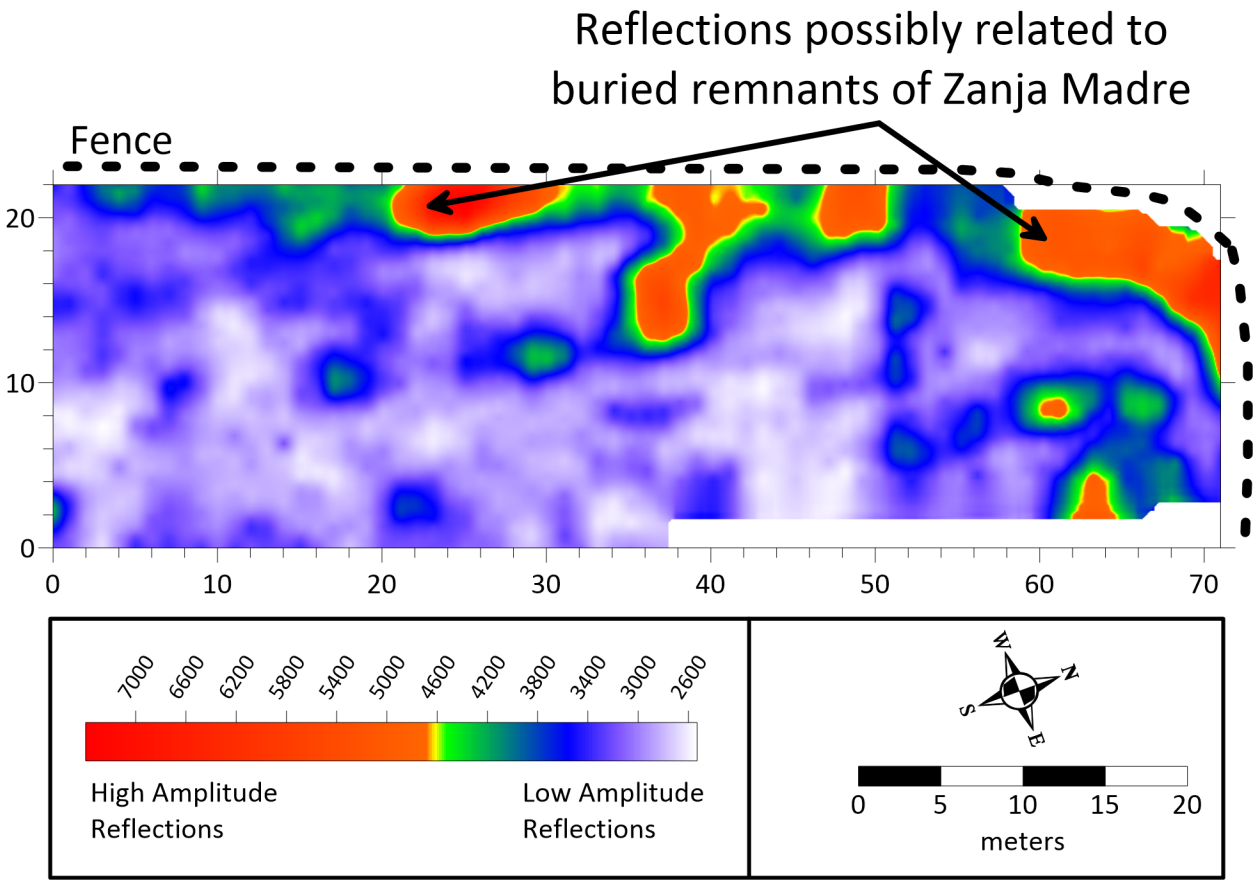

Figure B.6. Amplitude slice map showing the high-amplitude reflections from what may be remnants of the Zanja Madre beneath the parking lot.

This is further supported by analyzing the reflection profiles, which do not show the same clear, reflective geophysical signature from the Zanja Madre as the profiles collected over the intact portion. Instead, the reflection profiles from the parking-lot grid show smaller hyperbolic reflections in the area where the Zanja Madre is hypothesized (Figure B.7). These types of hyperbolic reflections are typical of individual features or objects, including pieces of debris, bricks, or the edges of a linear feature. As seen in the profile in Figure B.7, the two hyperbolic reflections may relate to edges or other remnant parts of the Zanja Madre. The other portions of the Zanja Madre may have collapsed or been destroyed, although this hypothesis requires other forms of testing to confirm. Also visible in the parking-lot reflection profiles are the reflective planar reflections from likely grading activity or fill related to the construction of the parking lot.

Overall, the analysis of the reflection profiles and amplitude slice maps suggests that the Zanja Madre continues to the north of the exposed portion. It appears to become progressively deeper and bends to the northeast. The analysis suggests that it may be intact along the base of the slope but is likely not intact or contiguous under the parking lot. If our hypotheses are correct, then the Zanja Madre's path takes it outside the Project area. It is possible that it connects with another exposed portion outside the Project area, to the north. The northern areas of the Project area were too steep and vegetated to effectively survey with GPR; thus, we could not determine if the Zanja Madre crosses back into the Project area to the north. However, GPR transects were collected near a small, mortared brick fragment in the slope of Area 7 that, it was concluded, is not part of the Zanja Madre and was instead an isolated structural fragment of unknown origin.

Historical-Period Rail Trackways

One additional grid was collected in the southern section of the Area 1 parking lot, to test for possible buried historical-period rail trackways. This followed the results of SRI's pedestrian survey, which showed multiple trackways visible within the surface of the parking lot. As seen in the amplitude slice maps (Figure B.8), the linear reflections associated with these trackways are visible, along with pockets of high-amplitude reflections that relate to features associated with the trackways (such as switch plates) or modern utility features. Although no trackways were located that were not also identified in the pedestrian survey, the GPR survey here was successful in mapping these features and would be useful in areas where the presence or layout of trackways is unknown.

Conclusions

Overall, the GPR surveys were highly successful at mapping portions of the Zanja Madre that are still present within the Project area. In addition, these surveys allowed us to hypothesize the spatial layout of the Zanja Madre, including where it might still be present within the Project area and where it likely extends beyond the Project area. After mapping the exposed portion of the Zanja Madre and developing its geophysical signature, we were able to follow it northward and determine its presence and likely intactness along the base of the slope. The Zanja Madre appears to get progressively deeper as it moves northward, up to a depth of approximately 50 cm (20 inches) before it bends slightly to the northeast and under the parking lot. The GPR grid collected in the parking lot showed reflections from a linear feature that follow along the fence line while bending slightly to the northeast. This matches the layout mapped along the slope base, as well. Analysis of the reflection profiles from the parking lot confirmed the reflections that were distinct from the stratigraphic fill found in other areas of the parking lot. Some of these distinct reflections have a hyperbolic geometry and may relate to debris or edges associated with the Zanja Madre.

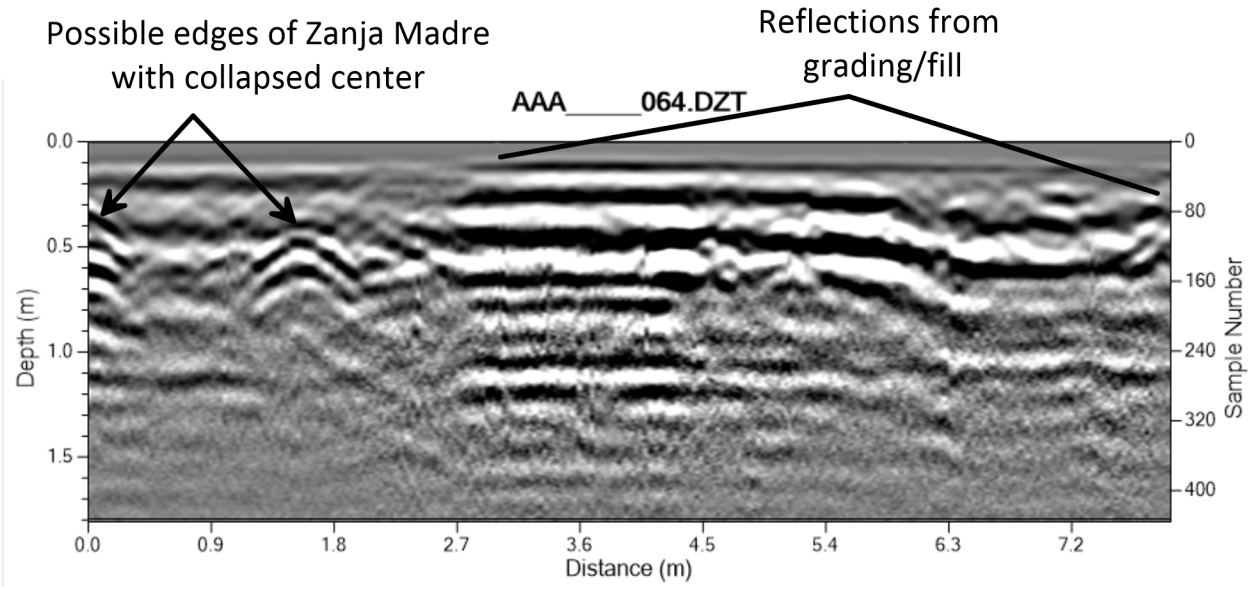

Figure B.7. Reflection profile from the parking-lot grid, showing two hyperbolic reflections that may relate to the edges or other sections of the Zanja Madre. The lack of a continuous high-amplitude hyperbolic reflection as seen in the test profiles suggests that this possible portion of the Zanja Madre has been partially destroyed or collapsed. Also seen in this profile are the reflective planar reflections from fill or grading activity related to construction of the parking lot.

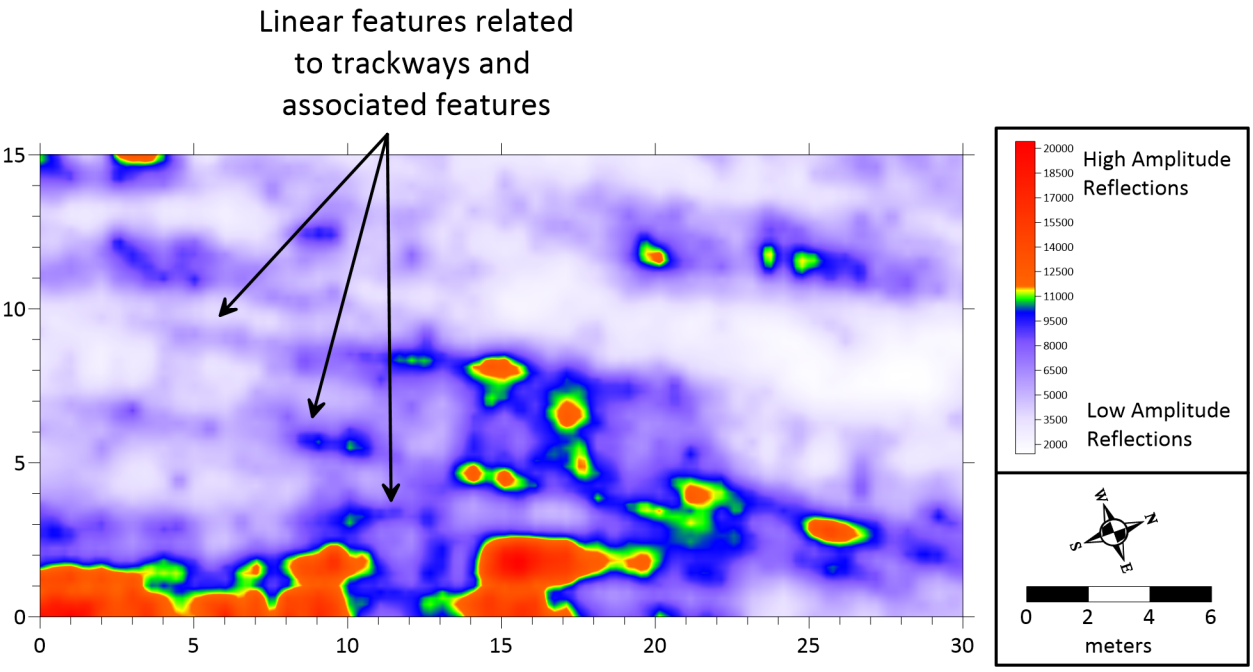

Figure B.8. Amplitude slice map showing the linear features associated with rail trackways and associated features.

Because the reflection profiles do not show the same geophysical signature as the intact portion of the Zanja Madre, we hypothesize that any portion that continues under the parking lot has likely been heavily impacted or destroyed in places. We mapped this portion of the Zanja Madre up to the Project area fence, at which point, it appears, the Zanja Madre continues outside the Project area. An exposed brick feature in Area 7 was then tested with GPR and determined to be a singular feature and not related to the Zanja Madre. However, other areas in the northern Project area were too steep and vegetated to effectively survey; so, we could not test for the Zanja Madre in other parts of the Project area.

Although our analysis is supported by the overall expanse, geometry, and nature of potential features within a large survey area, it should be noted that some elements of these features are likely more complex than can be adequately described in a GPR analysis. Other forms of testing, such as excavation, will be necessary to elucidate some of the hypotheses presented here. However, the GPR surveys were successful in confirming the presence, location, and nature of features of both cultural and management interest, thereby meeting the goal of testing for the subsurface presence of features with potential cultural importance within the Project area. With the information provided through these surveys, any future archaeological testing efforts can now be more targeted and efficient, thereby increasing the odds of obtaining successful information and further elucidating the nature of past human activities within the Project area.

REFERENCES CITED

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2013 *Ground-Penetrating Radar for Archaeology*. 3rd ed. Alta Mira, Walnut Creek, California.

Conyers, Lawrence B., and Jeffrey E. Lucius
1996 Velocity Analysis in Archaeological Ground-Penetrating Radar Studies. *Archaeological Prospection* 3:25–38.

Goodman, Dean, and Salvatore Piro
2013 *GPR Remote Sensing in Archaeology*. Geotechnologies and the Environment 9. Springer, Heidelberg, Germany.

APPENDIX C

Archaeological Test Excavations and Additional Ground-Penetrating-Radar Assessment for the Buena Vista Project, City of Los Angeles, California

Patrick B. Stanton and Jennie O. Sturm

STATISTICAL RESEARCH, Inc.
ARCHAEOLOGY • ANTHROPOLOGY • HISTORY • HISTORIC ARCHITECTURE • PALEONTOLOGY

February 7, 2024

Mark Workman
Senior Vice President
Lincoln Property Company
390 N. Pacific Coast Highway, Suite 3100
El Segundo, CA 90245

RE: Archaeological Test Excavations and Additional Ground-Penetrating-Radar Assessment for the Buena Vista Project, City of Los Angeles, California (Technical Report 24-09)

Mr. Workman:

This letter report contains the results of the archaeological test excavations and additional ground-penetrating-radar (GPR) assessment conducted for the Buena Vista Project (Project) by Statistical Research, Inc. (SRI). The first section of this report, prepared by SRI archaeologist Patrick B. Stanton, contains the results of the archaeological test excavations. Following that, we present the results of the additional GPR assessment, prepared by SRI's Geophysics Program Director Dr. Jennie O. Sturm. Illustrations for each of these discussions appear as an appendix to this letter: Appendix A consists of images from the archaeological testing, and Appendix B contains images related to the GPR assessment.

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Archaeological Testing

On November 14 and 15, 2023, Mr. Stanton visited the Project area to test whether two exposed sections of mortared brick on the hillslope in the northeastern portion of the Project area (previously identified as SRI-17c and SRI-17d; Sturm 2022:Figure B.3) were related to the Zanja Madre. These sections were identified during our previous survey of the area (Vyhmeister et al. 2022), and it was unclear whether they represented portions of the Zanja Madre or were displaced fragments of building materials. In addition to these sections, segment SRI-17a, the southernmost segment identified during our previous survey, was tested to determine whether it was in situ or had been moved out of alignment with the nearby SRI-17b as a result of mechanical disturbance.

Methods

In each location, the ground surface in the immediate area was cleared of vegetation, rocks, and debris to assess whether any additional, partially buried parts of the segment were observable. Following that, the hillslope on which these segments were located was cut back so that the general soil conditions and the profile of the segment could be examined. The surrounding ground surface was then excavated down 10–20 cm (3.9–7.9 inches) below the surface, to observe whether a subsurface component was present. Photographs of each section were taken to further document the results.

Results

SRI-17c and SRI-17d Testing

Excavation of the ground surface surrounding both segments revealed that the sediments that make up the slope materials (and on which the segments rest) are composed of colluvium and fill material, indicating that the segments are on highly disturbed sediments (see Figures A.1 and A.2). Test excavations associated with these segments revealed no subsurface components. Furthermore, during excavation, the eastern fragment associated with SRI-17d became dislodged and allowed for better examination of that segment. When observed in profile, the fragment lacked any of the curvature seen in confirmed portions of the Zanja Madre and appeared, instead, straight-sided and blocky, suggesting that this section and likely other sections associated with SRI-17c and SRI-17d are isolated portions of walls, platforms, or other building debris (see Figure A.3) that was pushed downslope, possibly from the leveling of the top of the slope along North Broadway, and neither segment is associated with the Zanja Madre. The ages of these fragments could not be determined.

SRI-17a Testing

The northeastern end of SRI-17a was excavated to identify whether it had a subsurface component or was part of a larger segment that had been pushed out of alignment during development of the area (see Figure A.4). During excavation, several additional intact courses of brick were observed below the ground surface, suggesting that the alignment of the segment was relatively intact. Additionally, a large steel object was observed intersecting the segment wall. The object was left in place, but judging from the portion of it that was observable, it appeared to be a segment of steel track from a small track-style vehicle. Other refuse found within the sediments included fragments of discarded metal. Based on these observations, SRI-17a, though damaged and slightly out of alignment, appears to have a substantial subsurface component.

Mitigation Measures

SRI's initial study (Vyhmeister et al. 2022) identified confirmed segments of the Zanja Madre and recommended the resource eligible for listing in the California Register of Historical Resources under Criteria 1 and 4 and potentially eligible for listing in the National Register of Historic Places under Criteria a and d. Furthermore, the study concluded that the Zanja Madre meets the California Environmental Quality Act (CEQA) definition of a unique archaeological resource as defined in *Public Resources Code* (PRC) 21083.2, meaning that the site is to be treated in accordance with the provisions of PRC 21083.2—in particular, the specifications that (1) when the lead agency determines that a project will have a significant effect on unique archaeological resources, the lead agency may require that reasonable efforts be made to preserve the resources in place and (2) when preservation in place is not feasible, mitigation measures shall be required (PRC 21083.2[a–c]). Implementation of these mitigation measures reduces Project impacts to cultural resources to a less-than-significant level. This mitigation complies with the *Conservation Element of the City of Los Angeles General Plan* (City of Los Angeles 2001:Section II-3) for the protection of archaeological resources and provides treatment of cultural resources that goes above and beyond the standard City of Los Angeles Conditions of Approval by requiring archaeological monitoring to reduce Project impacts to a less-than-significant level. In addition, the mitigation is informed by the provisions of the draft City of Los Angeles (2022:26–27) *Downtown Los Angeles Community Plan Update* in that it enhances opportunities for interpreting the unique culture history of the area.

SRI's initial study (Vyhmeister et al. 2022:32–33) presented AN extensive mitigation measure (Mitigation Measure CUL-1) detailing the need to prepare and implement a Cultural Resources Monitoring and Treatment Plan (CRMTP). That plan shall dictate the process for addressing known archaeological resources as well as unanticipated archaeological resources that may be unearthed during construction,

including potential prehistoric and historical-period resources. To account for any such unanticipated resources, the CRMTP shall include a requirement to develop and implement a Worker Environmental Awareness Program (WEAP) that sets forth protocols to train on-site construction workers to identify and appropriately respond to the inadvertent encounter of potential cultural resources during earthmoving activities. The CRMTP shall also include specific protocols regarding work in proximity to the exposed sections of the Zanja Madre within the Project area and the anticipated locations of additional Zanja Madre sections or fragments that may be buried on-site, including protocols for monitoring, recording, photography, and artifact collection.

Based on the results of the testing, segment SRI-17a appears to be relatively intact but damaged and out of alignment. It is recommended that the requirements identified in Mitigation Measure CUL-1 (Vyhmeister et al. 2022:32–33) be applied to this segment. SRI-17c and SRI-17d were not identified as belonging to the Zanja Madre. Instead, they are likely from a demolished structure or platform of an unknown age and were found in a secondary context. Therefore, no mitigation measures are required for these two fragments.

Additional GPR Studies to Test for Portions of the Zanja Madre: Buena Vista, Los Angeles, California

In March 2022, GPR surveys were conducted in the Project area in Los Angeles, California, with the primary goal of testing for the presence and layout of the Zanja Madre. The surveys were highly successful, and a likely portion of the Zanja Madre was mapped to the north of its exposed location in the south-central part of the Project area. The results of the surveys are documented in the report, *Cultural Resource Evaluation and Impact Assessment for the Buena Vista Project, City of Los Angeles, California* (Vyhmeister et al. 2022). After the initial study, there remained some ambiguity about whether the Zanja Madre extended to the south and, if so, its placement and level of intactness. In addition, a newly exposed brick feature in the northern part of the Project area added some confusion concerning whether it was associated with the Zanja Madre. Also, parts of the northern areas were inaccessible during the March 2022 surveys, and the GPR data necessary to test for whether the path of the Zanja Madre extended into those areas could not be collected.

To test these hypotheses and further delineate the path of the Zanja Madre, additional GPR surveys were conducted between November 14 and 15, 2023. Dozens of transects were collected in the southern area, between the buildings and the retaining wall (see Figure B.1), as well as in the northern lot, above where the brick feature was exposed (see Figure B.2). The data were collected by SRI Geophysics Program Director Dr. Jennie O. Sturm and Geophysical Archaeologist Maeve Herrick, using a GSSI SIR-4000 system with GSSI 350 HS 350-MHz antennas. Prior to collecting data, the system was calibrated to ensure that optimum data were being collected. The same system parameters used for the March 2022 GPR surveys (Sturm 2022:B.5–B.9) were used for this survey. Similar data-processing procedures were followed, as well, including reflection-profile analysis, in which individual profiles were displayed, corrected for depth, and processed to filter out background noise and enhance amplitudes, using RADAN 7 software.

Following the GPR survey, each transect and the exposed portions of the Zanja Madre were mapped with a Carlson BRx7 real-time kinematic global navigation satellite system (RTK GNSS) in a base/rover configuration, which provides ±1-cm (0.4-inch) horizontal positional accuracy. That allowed us to georeference each GPR transect in our working geodatabase in order to compare features identified in the GPR reflection profiles to the exposed portion of the Zanja Madre.

The results of the GPR surveys did not show intact portions of the Zanja Madre in any of the transects collected. This is in contrast to the March 2022 surveys, during which likely portions of the Zanja Madre were mapped along the base of the slope immediately north of the exposed Zanja Madre section in the south-central part of the Project area (see Figure B.3). This suggests that the Zanja Madre either is no longer

present in the southern portion of the Project area or has deteriorated to such an extent that it is not resolvable in the GPR data.

During our survey, we also noted a linear cluster of bricks beneath a retaining wall between the buildings. It was mapped in with the RTK GNSS during the GPR survey, and when placed into the geodatabase, its location seemed to match the possible path of the Zanja Madre as it continued southward (see Figure B.4). Therefore, our working hypothesis was that the linear cluster of bricks was once part of the portion of the Zanja Madre and had been damaged/destroyed during the construction and installation of the retaining walls in the southern area.

In the northern lot, no reflections related to the Zanja Madre were identified. In addition, testing of the brick feature (conducted concurrently with the GPR survey) determined that it is an isolated feature and is not related to the Zanja Madre (see Figure B.5).

Comparing the location of the Zanja Madre as determined by the GPR surveys to its location according to historical records and aerial photographs lends some additional insights into the Zanja Madre's path through the Project area. In general, the path of the Zanja Madre discerned from SRI's data matches what could be identified from historical records, which further supports our interpretation that the exposed bricks in the northern section of the Project area are not related to the Zanja Madre. However, the match between the historical records and SRI's data is not exact, and we hypothesize that the variations are primarily related to the inherent inaccuracies that occur when georeferencing a feature from historical data. Crucially, the Zanja Madre as digitized from historical maps does not match the exposed portions of it within the south-central part of the Project area (see Figure B.6).

Our hypothesized path for the Zanja Madre therefore uses the historical data as a general guide but tries to home in on the exact path more accurately by combining the areas where the Zanja Madre is exposed (and mapped in with the RTK GNSS) with its location according to the GPR data from 2022 and 2023. That is, the Zanja Madre appears to have an intact, in situ portion exposed in the south-central portion of the Project area. As mapped via GPR in 2022, this section likely continues along the base of the slope to the north and may continue on a slight curve under the current parking lot (see Figure B.6), although as shown in the 2022 GPR surveys, it is not likely intact under the parking lot. Its path then likely continues outside the current Project area, where it possibly links up with another exposed feature to the north that appears similar to the Zanja Madre. We determined through both GPR and excavation that the Zanja Madre is unlikely to be present upslope, in the northern part of the Project area.

To the south, a portion of the Zanja Madre is present on the southern side of the cut in the south-central portion of the Project area. However, its orientation and the presence of an intrusive piece of machinery suggest that it may not be fully in situ. Farther south, between the buildings, the Zanja Madre may have been partially or totally destroyed during installation of the retaining wall. No intact sections were identified in the GPR data, and a linear expanse of collapsed bricks was noted under part of the retaining wall (see Figure B.6). Our current hypothesis is that the southern part of the Zanja Madre has been partially or totally destroyed by construction activities. Figure B.7 presents as complete a picture as possible of the hypothesized path of the Zanja Madre.

Conclusions

The additional GPR surveys were successful at further delineating the possible pathway of the Zanja Madre. Certain ambiguous areas were eliminated as likely options for the Zanja Madre's path, particularly in light of the test excavations. It now appears highly likely that no part of the Zanja Madre is present in the northern part of the Project area.

In addition, the results of the GPR surveys suggest that few portions of the Zanja Madre are likely still intact in the southern part of the Project area, particularly the southernmost portion between the buildings, where no likely portion of the Zanja Madre was mapped via GPR and where a linear expanse of bricks was

noted under the retaining wall. It therefore seems plausible that parts of the Zanja Madre were partially or wholly destroyed during installation of the retaining wall.

Finally, by combining the GPR surveys with high-precision RTK GNSS mapping and mapping the exposed portions of the Zanja Madre in relation to the GPR-transect positions, we were able to hypothesize a more accurate spatial layout of the Zanja Madre. The result is a more accurate picture of the Zanja Madre's probable path through the Project area.

References Cited

City of Los Angeles

2001 *Conservation Element of the City of Los Angeles General Plan.* City Plan Case No. 2001-0413-GPA, Council File No. 01-1094, adopted by the City Council 26 September and approved by the City Planning Commission 10 March. City of Los Angeles.

2022 *Downtown Los Angeles Community Plan Update.* City of Los Angeles.

Sturm, Jennie O.

2022 Ground-Penetrating Radar Studies at Buena Vista, Los Angeles, California. In *Cultural Resource Evaluation and Impact Assessment for the Buena Vista Project, City of Los Angeles, California*, by Joy L. Vyhmeister, Jennie O. Sturm, Joseph J. El Adli, Karen K. Swope, and Patrick B. Stanton, Appendix B. Technical Report 22-43. Statistical Research, Redlands, California.

Vyhmeister, Joy L., Jennie O. Sturm, Joseph J. El Adli, Karen K. Swope, and Patrick B. Stanton

2022 *Cultural Resource Evaluation and Impact Assessment for the Buena Vista Project, City of Los Angeles, California.* Technical Report 22-43. Statistical Research, Redlands, California.

As always, SRI is pleased to provide our data and interpretations related to this important cultural resource to the Project team. Please let us know if this letter report satisfies your needs. Do not hesitate to contact me if you have any questions; we are available to discuss further as needed.

Sincerely,

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Statistical Research, Inc.
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(505)323-8300

APPENDIX A

Figures: Archaeological Testing



Figure A.1. Profile of SRI-17c, view to the north.



Figure A.2. Profile of SRI-17d, view from above and to the north.



Figure A.3. Cross section of the eastern portion of SRI-17d, view from above.



Figure A.4. Profile of SRI-17a, view from above.

APPENDIX B

Figures: Ground-Penetrating-Radar (GPR) Assessment



Figure B.1. Overview map of the southern portion of the project area, showing the GPR transects collected. The exposed portions of the Zanja Madre and the linear cluster of bricks under the retaining wall are also shown.



Figure B.2. Overview map of the northern portion of the project area, showing the GPR transects collected. The materials seen in the aerial photograph were not present during the time of our survey.

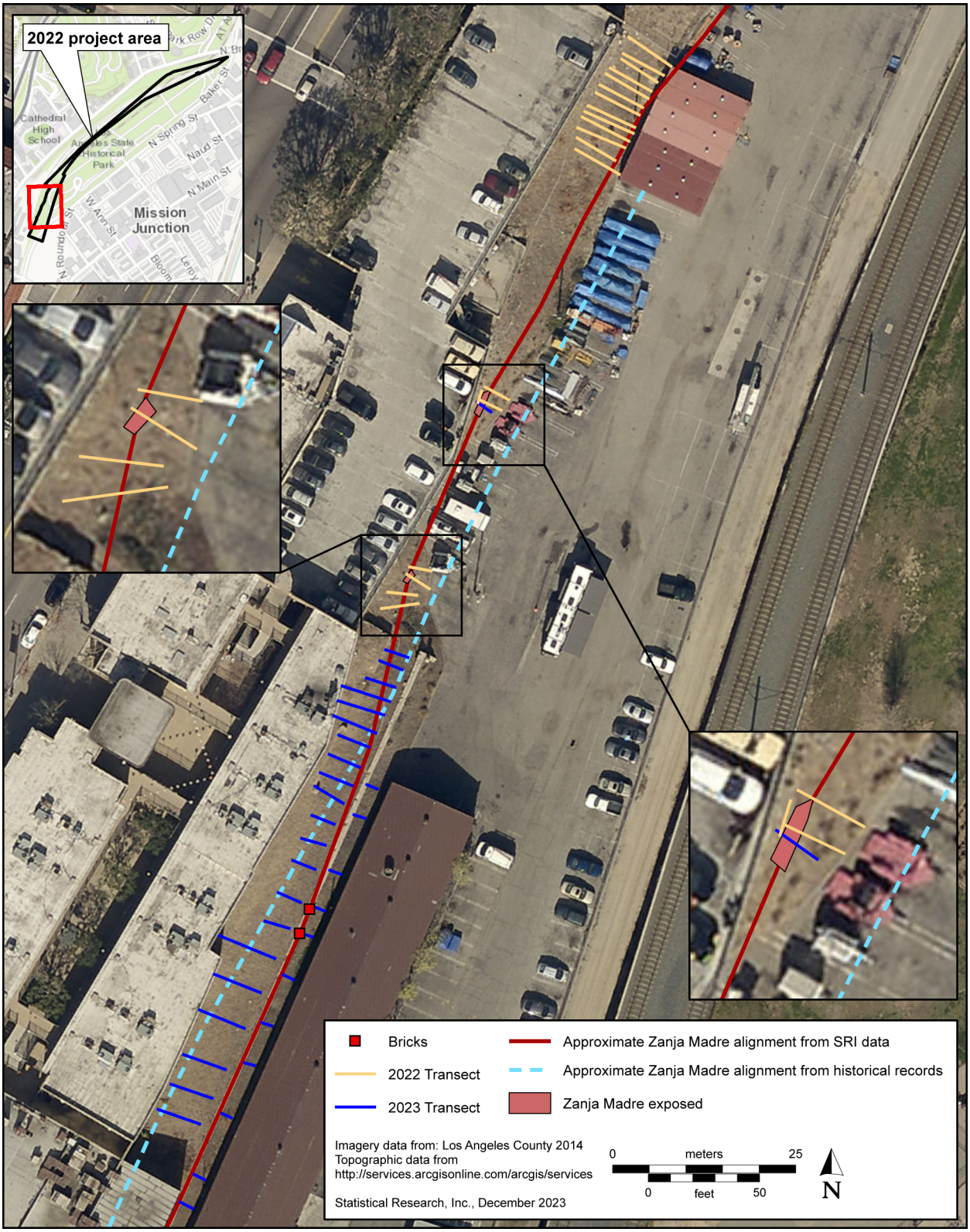

Figure B.3. Overview map of the southern portion of the project area, showing the GPR transects collected in 2022 and 2023. The linear cluster of bricks under the retaining wall is also shown.

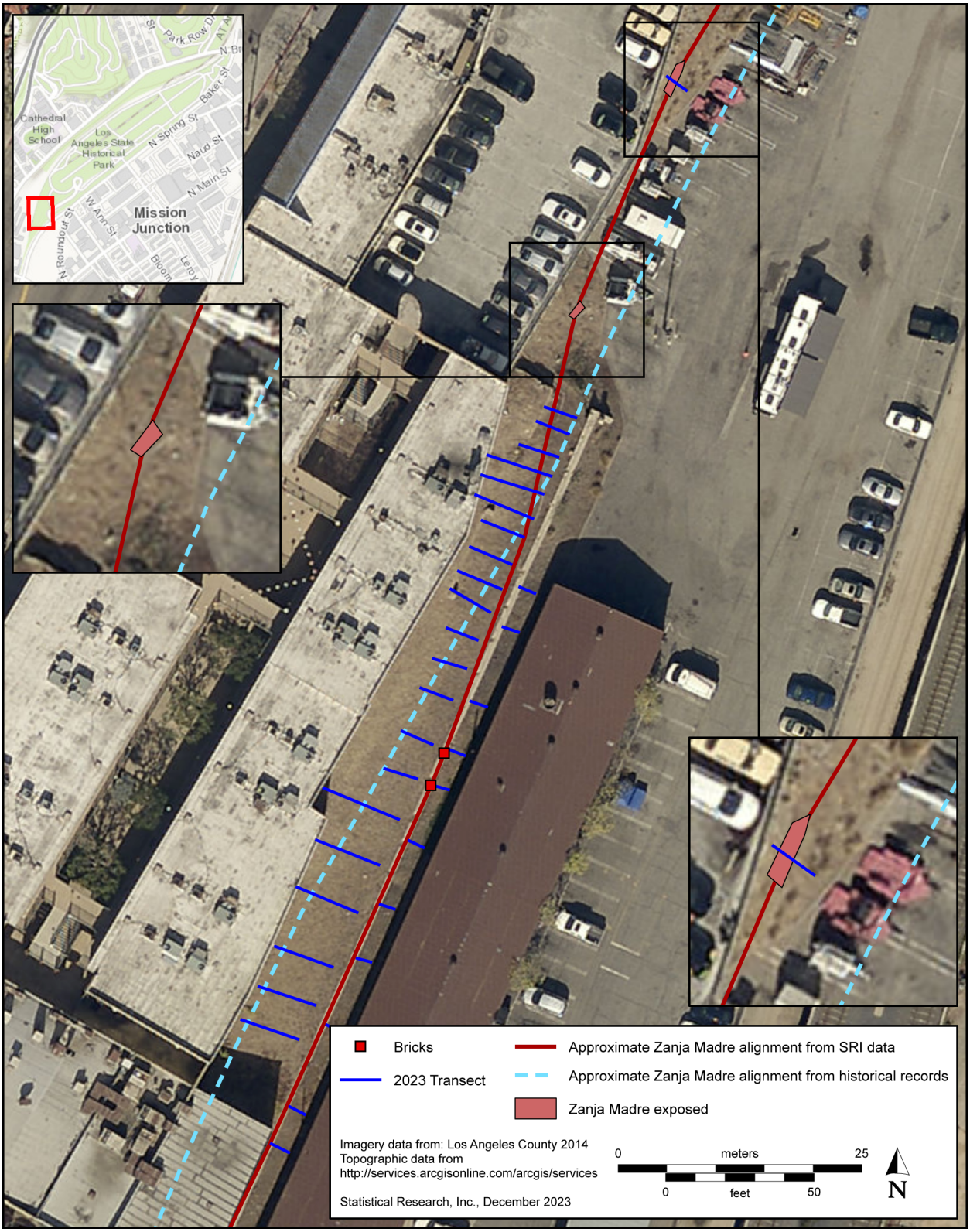

Figure B.4. Overview map of the southern portion of the project area, showing the hypothesized path of the Zanja Madre.



Figure B.5. Overview map of the northern portion of the project area, showing the areas of bricks that were tested in 2023. The Zanja Madre does not appear to be present in the northern area.

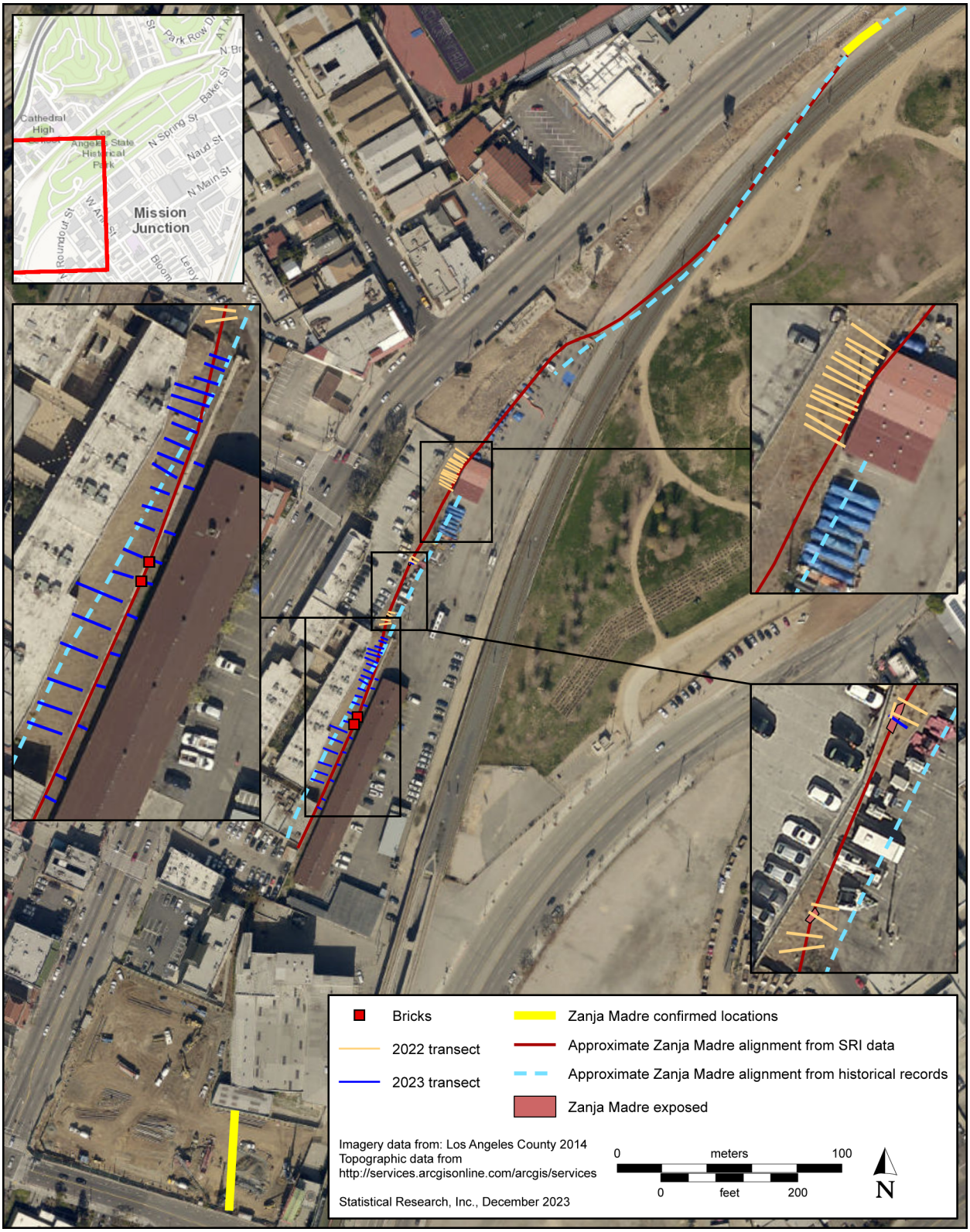

Figure B.6. Overview map of the southern and south-central portions of the project area, showing the hypothesized paths of the Zanja Madre as determined from the GPR surveys and historical records.

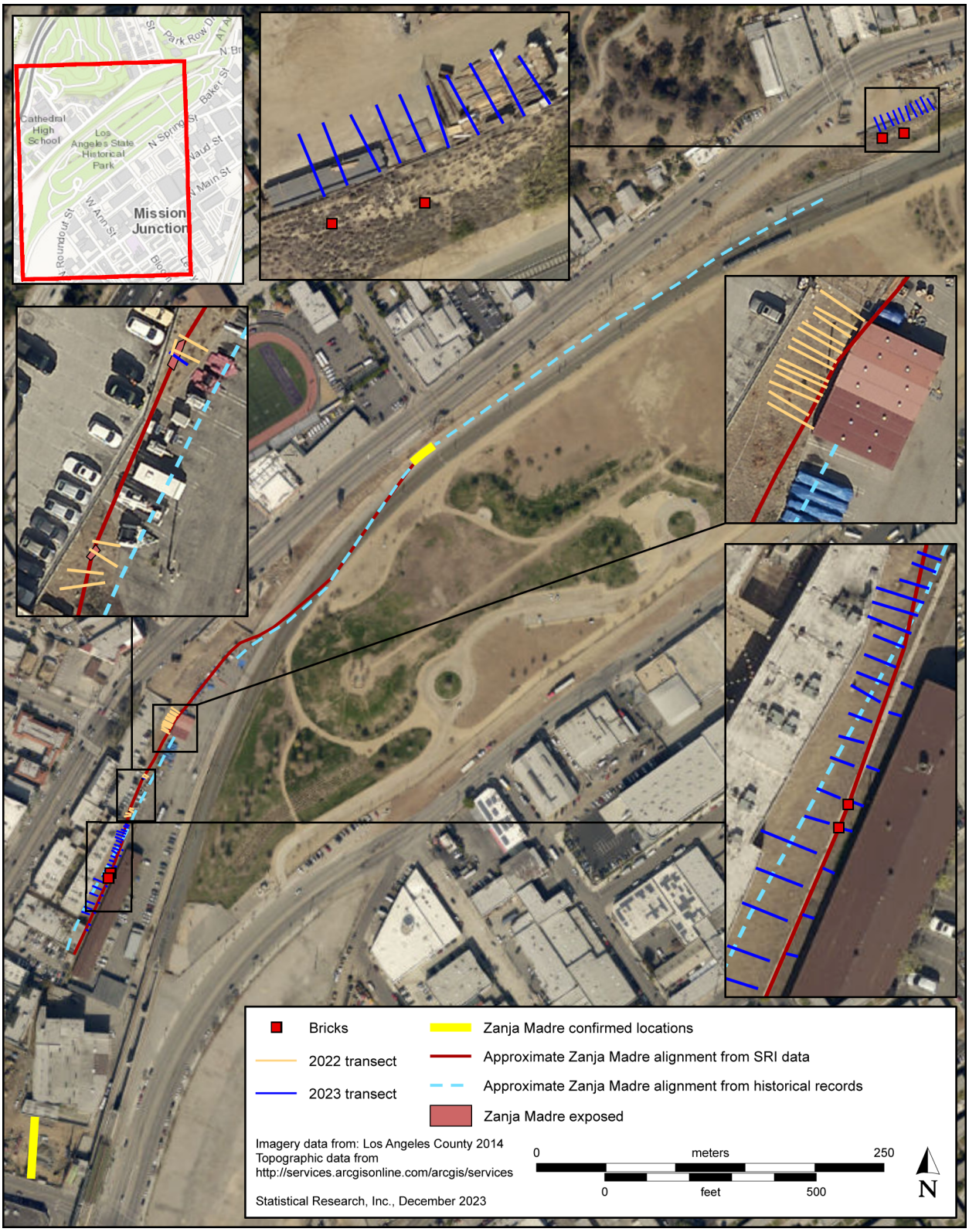

Figure B.7. Overview map of the full project area, showing the hypothesized path of the Zanja Madre as determined from the GPR surveys and historical records.

Native American Heritage Commission Correspondence for the Buena Vista Project, City of Los Angeles, California

Sacred Lands File & Native American Contacts List Request

Native American Heritage Commission
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
916-373-3710
916-373-5471 – Fax
nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: Buena Vista Project

County: Los Angeles

USGS Quadrangle Name: Los Angeles 7.5-minute

Township: 7S **Range:** 8W **Section(s):** Unsectioned

Company/Firm/Agency: Statistical Research, Inc.

Street Address: 617 Texas St.

City: Redlands, CA **Zip:** 92374

Phone: 909.335.1896

Fax:

Email: pstanton@sricrm.com

Project Description:

The Project site consists of approximately 8.1 acres located at 1251 North Spring Street and 1030-1380 North Brodway along the east side of Broadway in the City of Los Angeles, California from just north of the Metro Chinatown Station to just past Elysian Park Drive. The proposed project will redevelop the the Project site with approximately 986 residential units and approximately 38,000 square feet of neighborhood serving retail/restaurant with associated parking.

NATIVE AMERICAN HERITAGE COMMISSION

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April 18, 2022

Patrick Stanton
Statistical Research, Inc.

Via Email to: pstanton@sricrm.com

Re: Buena Vista Project, Los Angeles County

Dear Mr. Stanton:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded 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. I suggest you contact all of those indicated; if they cannot supply information, they might 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 me. 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

Andrew Green
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
Los Angeles County
4/18/2022

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Cahuilla
Luiseno

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Buena Vista Project, Los Angeles County.