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SECONDARY SUBMISSIONS

MANHATTAN WEST

4/4/2023

Date

Department of City Planning
200 North Spring Street, Room 763
Los Angeles, CA 90012

RE: 308 N Oxford Avenue – Density Bonus Entitlement Project

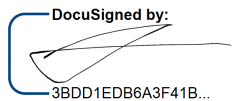
I am the owner of the property located at:

328 N Serrano Ave Los Angeles, CA 90004

I am aware of the pending application by Manhattan West Real Estate for a seven-story apartment development project located at 308 N Oxford Ave which would contain 101-apartment units.

As a property neighbor, I believe the proposed development will enhance the neighborhood area by replacing a sparingly used retail spa, underutilized surface parking, a vacant office and vacant lot. The proposed development will also improve the neighborhood by improving the street appeal with a new securitized building and adding housing to the area to support the abundant retail sprawling on Western Avenue and Beverly Blvd. The modern design of the building and proposed landscape features will also enhance the adjacent commercial uses and the surrounding neighborhood while also providing needed market-rate and affordable housing. I fully support the above referenced cases and other related City approvals to use the subject property for the apartment development project and I urge you to approve the requests.

Sincerely,

DocuSigned by:

3BDD1EDB6A3F41B...

Signature

Michael Shlomof
Name (Printed)

Onward Capital
Company

750 S San Vicente Blvd #RE80
Mailing Address

West Hollywood, CA 90069
City, State and Zip Code

MANHATTAN WEST

4/4/2023

Date

Department of City Planning
200 North Spring Street, Room 763
Los Angeles, CA 90012

RE: 308 N Oxford Avenue – Density Bonus Entitlement Project

I am the owner of the property located at

412 N Oxford Ave Los Angeles, CA 90004

I am aware of the pending application by Manhattan West Real Estate for a seven-story apartment development project located at 308 N Oxford Ave which would contain 101-apartment units.

As a property neighbor, I believe the proposed development will enhance the neighborhood area by replacing a sparingly used retail spa, underutilized surface parking, a vacant office and vacant lot. The proposed development will also improve the neighborhood by improving the street appeal with a new securitized building and adding housing to the area to support the abundant retail sprawling on Western Avenue and Beverly Blvd. The modern design of the building and proposed landscape features will also enhance the adjacent commercial uses and the surrounding neighborhood while also providing needed market-rate and affordable housing. I fully support the above referenced cases and other related City approvals to use the subject property for the apartment development project and I urge you to approve the requests.

Sincerely,

DocuSigned by:
Emmanuel Lebranche
D256072783D2426...
Signature

Emmanuel Lebranche
Name (Printed)

412 Oxford LLC
Company

127 N Robertson Blvd
Mailing Address

Los Angeles, CA 90048
City, State and Zip Code



May 8, 2023

Stephanie Escobar, City Planning Associate
Stephanie.Escobar@lacity.org

Dear City Planning Commission,

We are writing to you in support of the proposed 151-unit mixed use development, including 17 affordable units, at 1200-1281 North Vine Street, CPC-2022-7047-CU-DBSPR-HCA/ENV-2020-7048-CE. We urge the city to approve the project with the Density Bonus and incentives.

The greater Los Angeles region is facing a severe housing shortage, particularly affordable housing. Creating new housing in this neighborhood will help to reduce issues of gentrification and displacement. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is in a great location for housing, with multiple bus stops, restaurants, and shopping nearby, and walking and bicycling distance to the Hollywood Recreation Center and the Metro Red Line. It is great to see the developer using the Density Bonus program to bring new homes, including badly needed affordable housing to the city. Affordable housing programs that depend on a percentage of new construction being affordable need a lot of new construction to have an impact, and the city should work to increase the number of developers using the Density Bonus. This project is a good project for Los Angeles and for the region and we urge the city to approve the Density Bonus and incentives.

Best Regards,

Leonora Camner

Leonora Camner
AHLA Executive Director

Jaime Del Rio

Jaime Del Rio
AHLA Field Organizer

Tami Kagan-Abrams

Tami Kagan-Abrams
AHLA Project Director



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May 3, 2023

Via Email

Los Angeles City Planning Commission
Samantha Millman, President
Caroline Choe, Vice President
Maria Cabildo, Member
Monique Lawshe, Member
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Stephanie.escobar@lacity.org

**Re: Comment on Categorical Exemption, 1200 N. Vine Street Project (CPC-2022-7074-CU-DB-SPR-HCA; ENV-2022-7048-CE)
City Planning Commission Hearing; May 11, 2023**

Dear President Millman, Vice President Choe, Members of the City Planning Commission, and Ms. Escobar:

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the proposed Class 32 In-fill Development Categorical Exemption ("Exemption") for the 1200 N. Vine Street Project (CPC-2022-7074-CU-DB-SPR-HCA; ENV-2022-7048-CE), including all actions related or referring to the proposed construction of a seven-story, 151 dwelling unit mixed-use project, including 3,690 square feet of ground floor commercial uses, located at 1200-1218 N. Vine Street and 6245-6247 W. Lexington Ave. in the City of Los Angeles ("Project").

SAFER objects to the City of Los Angeles' ("City") decision to exempt the Project from review under the California Environmental Quality Act ("CEQA") pursuant to Section 15332 of the CEQA Guidelines. CEQA review is required for the Project. As demonstrated below, the Exemption is inapplicable because the Project will have significant noise impacts, and the City's conclusion that air quality impacts will be less than significant is unsupported by substantial evidence, precluding use of the Class 32 Exemption. Since the Project is not exempt from CEQA, an initial study must be prepared to determine the appropriate level of CEQA review required.

This comment has been prepared with the assistance of expert consulting firm Baseline Environmental Consulting (“Baseline”) (Exhibit A). We incorporate the Baseline comments herein by reference.

DISCUSSION

I. The Class 32 Exemption Does Not Apply on its Face.

The proposed Project does not qualify for a Class 32 Exemption under CEQA because of the Project’s significant noise impacts, and because of the City’s lack of substantial evidence that air quality impacts will be less than significant. The City must prepare an Initial Study to determine the appropriate level of CEQA review, be it a mitigated negative declaration or an environmental impact report.

The Class 32 exemption provides:

Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value, as habitat for endangered, rare or threatened species.
- (d) *Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*
- (e) The site can be adequately served by all required utilities and public services.

(14 CCR § 15332 [emph. added].)

One of the key limitations of the Exemption is that it does not apply if the project will have any significant effects relating to air quality or noise. (14 CCR § 15332(d).)

a. There is Substantial Evidence that the Project Will Have Significant Construction Noise Impacts.

Expert consulting firm Baseline Environmental Consulting (Baseline) reviewed the Categorical Exemption (“CE”) for the Project to determine whether environmental impacts related to noise and air quality were properly evaluated. Baseline found various flaws in the CE’s analysis. Baseline’s comment letter is attached as Exhibit A.

First, construction noise impacts were evaluated using the SoundPLAN Essential model (version 5.1), and “best practice techniques” were assumed as part of the analysis. (CE p. 3-42; Ex. A, p. 1.) However, the CE and accompanying appendix on Noise Technical Modeling did not provide specific information as to the noise reduction amounts that could be achieved through use of the best practices technique. (Ex. A, p. 1.) Baseline found that this information is crucial in determining the significance of the Project’s construction noise impact, and should be disclosed in the CE. (Id.) Without this information, the analysis is incomplete and cannot be relied upon as substantial evidence that construction noise impacts would be less than significant.

Further, Baseline found that the CE failed to properly evaluate the noise levels at the nearest sensitive receptors at the two residential receptors located five feet east of the project site, and the Mental Health Center located adjacent to the north of the Project. (Ex. A, p.1.) The figures in Appendix D of the CE demonstrate that the analyzed distances used to measure impacts on sensitive receptors were not located on the building facades nearest to the Project site, and therefore do not represent the worst-case scenario. (Id. at 1-2.)

A review of the construction noise sound contour map for the Project shows that for the two residential buildings east of the Project site, modeled construction-generated noise levels on the façade facing the Project are around 70-75 dBA, which is more than 10 dBA higher than the reported existing ambient noise level of 59.5 dBA. (Ex. A, p. 2-3; CE, p. 2-41; Table 6-5.) Similarly, the modeled construction-generated noise levels for the Mental Health Center on the façade facing the Project site are 70-75 dBA, which is up to 7 dBA higher than the reported existing ambient noise level of 68.1 dBA. (Id.). Construction noise impacts on sensitive receptors were therefore significantly underestimated.

The City’s 2006 L.A. CEQA Thresholds Guide states that a project would have a significant impact on noise levels from construction if construction activities lasting more than 10 days in a 3-month period exceed existing ambient exterior noise levels by 5 dBA or more at noise-sensitive uses. (Ex. A, p. 3; City of Los Angeles, 2006. L.A. CEQA Thresholds Guide.) ***When properly modeled, the Project’s construction noise impacts exceed the City of Los Angeles’ noise threshold at both of the residential receptors east of the Project site, and at the Mental Health Center to the north.*** Therefore, the Project’s noise impacts would be significant, and the City is precluded from using an Infill Exemption for the Project.

b. The City’s Analysis of Health Risk Impacts is Incomplete, and Therefore its Findings Cannot be Relied Upon to Support a Categorical Exemption.

An agency’s determination that a categorical exemption applies to a project must be supported by substantial evidence. (See, *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720, 728.) Substantial evidence is defined in the CEQA Guidelines as “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be

reached,” and includes “facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” (14 CCR § 15384.)

Here, the City has failed to provide substantial evidence that air quality impacts from the Project would be less than significant. The Project would result in Diesel Particulate Matter (“DPM”) emissions from the exhaust of off-road diesel construction equipment. The CE relied on two main reasons to conclude that the Project would not expose sensitive receptors to substantial DPM construction emissions. Baseline found that neither reason is supported by substantial evidence.

First, the CE stated that daily DPM emissions from the Project would be less than one pound per day throughout the construction period, and that therefore, the emissions would not result in substantial pollutant concentrations at off-site locations nearby. (CE, pp. 2-78 – 2-79.) Baseline stated that the CE failed to define a threshold concentration of DPM that would be considered “substantial pollutant concentrations at off-site locations nearby,” or provide scientific evidence to justify this statement. (Ex. A, p. 5.) Further, the CE did not provide a quantitative health risk assessment (“HRA”) to demonstrate that DPM emissions would be below South Coast Air Quality Management District (“SCAQMD”) thresholds. (Id.) Therefore, the CE’s conclusions regarding DPM emissions are not supported by substantial evidence, and the City is precluded from relying on these conclusions to support the use of an Infill Exemption for this Project.

Second, the City stated that because the anticipated construction period is 35 months, this is a short-term exposure period and would result in less-than-significant impacts. (CE, pp. 2-78 – 2-79.) The CE pointed to SCAQMD’s guidance that health risks be measured for receptors exposed to toxic air contaminants over a 30-year period. (Id.) Baseline responded that the Office of Environmental Health Hazards Assessment (OEHHA) states that “there is valid scientific concern that the rate of short-term exposure may influence the risk – in other words, a higher exposure to a carcinogen over a short period of time may be a greater risk than the same total exposure spread over a much longer time period.” (Ex. A, p. 5, quoting Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February.) Baseline also pointed out that while OEHHA guidance states that cancer risks should not be estimated for projects lasting less than two months, this Project’s 35-month construction period significantly exceeds that threshold, and an HRA should therefore be prepared. (Id.) Baseline stated that this HRA can evaluate the effectiveness of implementing exhaust control measures to reduce health risks. (Id.)

II. The Unusual Circumstances Exception Precludes Reliance on the Class 32 Exemption.

A categorical exemption is inapplicable “where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.” (14 CCR 15300.2(c).) In *Berkeley Hillside Preservation v. City of Berkeley*, the California Supreme

Court explained that there are two ways a party may invoke the unusual circumstances exception. First, “a party may establish an unusual circumstance with evidence that the project *will* have a significant environmental effect. That evidence, if convincing, necessarily also establishes ‘a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.’” (*Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1105 [emph. added].) Alternatively, “[a] party invoking the exception may establish an unusual circumstance without evidence of an environmental effect, by showing that the project has some feature that distinguishes it from others in the exempt class, such as its size or location. In such a case, to render the exception applicable, the party need only show a reasonable possibility of a significant effect due to that unusual circumstance.” (*Id.*)

As discussed above, the Project will have a significant noise impact. The fact that this significant impact will occur constitutes an unusual circumstance, precluding the City’s reliance on an exemption.

CONCLUSION

The City cannot rely on a Class 32 exemption because the Project does not meet the terms of the exemption and because the unusual circumstances exception to exemption applies. Accordingly, the City must prepare an initial study to determine the appropriate level of environmental review to undertake pursuant to CEQA. Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script that reads "Amalia Bowley Fuentes".

Amalia Bowley Fuentes
Lozeau Drury LLP

EXHIBIT A



14 April 2023
23207-00

Amalia Bowley Fuentes
Lozeau Drury LLP
1939 Harrison St., Suite 150
Oakland, CA 94612

Subject: Review of Noise and Air Quality Analyses in the Categorical Exemption for the 1200 Vine Project

Dear Ms. Fuentes:

Baseline Environmental Consulting (Baseline) has reviewed the Categorical Exemption (CE) for the 1200 Vine Project (project) in the City of Los Angeles (City), California to determine whether potential environmental impacts related to noise and air quality were appropriately evaluated. Based on our review, we have identified flaws in the CE analysis used to support the significance determinations. The specific concerns identified in the CE analysis for potential environmental impacts related to noise and air quality are described in detail below.

UNSUBSTANTIATED ANALYSIS OF CONSTRUCTION NOISE IMPACTS

The construction noise impacts at nearby sensitive receptors were modelled using SoundPLAN Essential model (version 5.1). As stated on page 2-42 of the CE, the use of industry standard “best practices techniques” required by the City’s Building and Safety code, such as temporary sound barriers, was assumed to be included in the project construction activities and therefore the noise modeling results are representative of reduced noise levels that would be achieved through use of best practices techniques. However, the CE and the Noise Technical Modeling (included in Appendix D of the CE) did not provide information on the specific noise reduction amounts that could be achieved by the best practices techniques (e.g., 10 dBA¹ noise reduction) or the noise levels at the sensitive receptors before the implementation of best practices techniques. This information is crucial in determining the significance of the project’s construction noise impact, which should be disclosed in the CE.

Besides the lack of required information, the CE failed to properly evaluate the noise levels at the nearest sensitive receptors at the two residential buildings located five feet east of the project site and at the Mental Health Center located adjacent to the north of the project. Page 16 of Appendix D of the CE includes a figure illustrating the locations of the sensitive receptors analyzed for the project, which is presented as **Figure 1** below. As shown in **Figure 1**, the analyzed distances to sensitive receptors for the two residential buildings to the east of the

¹¹ The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network.

Ms. Amalia Bowley Fuentes
14 April 2023
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project (green circles 6 and 7) and the Mental Health Center adjacent to the north of the project (green circle 4) do not represent the worst-case scenario, because they were not located at the building facades nearest to the project site.

Figure 1. Sensitive Receptors Analyzed in the CE



Source: 1200 Vine Project Categorical Exemption, Appendix D

The estimated construction noise sound contour map was provided on page 2-41 of the CE, which is presented as **Figure 2** below. As shown in **Figure 2**, for the two residential buildings located east of the project site, the modeled construction-generated noise levels at the west building facades facing the project site would be around 70 to 75 dBA. These noise levels are higher than the noise levels at the analyzed locations representing these buildings as shown on **Figure 1** and reported in Table 6-5 of the CE on page 2-42, which indicates modeled noise level of 61.4 dBA at green circle 6 for Residences – 6231-39 Lexington Avenue and 49.2 dBA at green circle 7 for Residences – 6232-38 La Mirada Avenue. According to Table 6-5 of the CE, an existing ambient noise level of 59.5 dBA was used for these two residential buildings, which was based on a short-term (15-minute) noise measurement at 6239 Lexington Avenue. The modeled construction-generated noise levels at the west building facades are more than 10 dBA higher than the existing ambient noise levels.

Figure 2. Construction Noise Sound Contours



Source: 1200 Vine Project Categorical Exemption, Figure 6-2.

Similarly, for the Mental Health Center adjacent to the north of the project site, the modeled construction-generated noise levels of 70 to 75 dBA at the southern building facade shown on **Figure 1** are higher than the modeled noise level of 58.5 dBA at the analyzed location (green circle 8 in **Figure 1**) which was reported in Table 6-5 of the CE. According to Table 6-5 of the CE, an existing ambient noise level of 68.1 dBA was used for this building, which was based on a short-term (15-minute) noise measurement at 1224 Vine Street.

In accordance with the City's 2006 *L.A. CEQA Thresholds Guide*,² a project would normally have a significant impact on noise levels from construction if construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA (hourly Leq³) or more at a noise-sensitive use. The modeled construction-generated noise levels of 70 to 75 dBA at the building facades facing the project site at the nearest sensitive receptors are more than 5 dBA higher than the existing ambient noise levels for these sensitive receptors, and therefore would exceed the City's significance threshold of a 5 dBA increase over existing ambient conditions. Therefore, the project's construction noise impact would be significant.

Ms. Amalia Bowley Fuentes
14 April 2023
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In summary, the CE failed to disclose the project's noise levels at the nearest sensitive receptors before the implementation of best practices techniques and the amount of noise reduction that could be achieved with the implementation of best practices techniques used in noise modeling. The CE analyzed construction noise levels at locations that do not face the project site at the nearest buildings to the project site, which resulted in underestimating the construction noise levels for sensitive receptors that face the project site. As stated above, the project's construction noise impacts at noise sensitive receptors would be significant as the noise levels would be more 5 dBA higher than existing ambient noise levels even with the incorporation of best practices techniques.

An Initial Study should be prepared because the project's noise impact would be significant even with the incorporation of best practices techniques. The Initial Study should properly evaluate the project's noise impact at the nearest sensitive receptors and include a mitigation measure with performance measures to ensure that implementation of best practices techniques would result in the necessary reduction in noise levels during construction.

INCOMPLETE ANALYSIS OF HEALTH RISKS

In 1998, the California Air Resources Board (CARB) identified diesel particulate matter (DPM) from diesel-powered engines as a toxic air contaminant (TAC) based on its potential to cause cancer and other adverse health effects.⁴ Project construction would generate DPM emissions from the exhaust of off-road diesel construction equipment. The nearest off-site sensitive receptors to the project site which could be exposed to DPM emissions generated by project construction are the Mental Health Center adjacent to the north and the residences five feet to the east, as identified in the CE.

As stated on pages 2-78 and 2-79, the CE concluded that the project would not expose sensitive receptors to substantial DPM constructions due to the following two reasons:

- 1) The project's daily DPM emissions would be less than one pound per day throughout the course of project construction. The level of daily DPM emissions would not be sufficient to result in substantial pollutant concentrations at off-site locations nearby.
- 2) The anticipated duration of construction activities is approximately 35 months, but health risks are typically performed for receptors that are exposed to toxic air contaminants over a 30-year period.

² City of Los Angeles, 2006. L.A. CEQA Thresholds Guide.

³ The average A-weighted noise level during the measurement period.

⁴ California Air Resources Board (CARB), 1998. Initial Statement of Reasons for Rulemaking; Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, June.

Ms. Amalia Bowley Fuentes
14 April 2023
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Regarding reason 1 above, the CE failed to define a threshold concentration of DPM that would be considered “substantial pollutant concentrations at off-site locations nearby” or provide scientific evidence to justify such a threshold; and therefore, the CE’s conclusion that less than one pound per day of DPM emissions would not result in “substantial pollutant concentrations at off-site locations” is not substantiated. Additionally, the CE did not provide a quantitative health risk assessment to demonstrate that the project would not generate DPM emissions exceeding the South Coast Air Quality Management District (SCAQMD) Air Quality Significance Thresholds for toxic air contaminants (TACs).

Regarding reason 2 above, the California Environmental Protection Agency, Office of Environmental Health Hazard Assessment (OEHHA) states that “there is valid scientific concern that the rate of short-term exposure may influence the risk – in other words, a higher exposure to a carcinogen over a short period of time may be a greater risk than the same total exposure spread over a much longer time period”.⁵ The OEHHA guidance also includes cancer risk evaluation of short-term projects, such as construction. According to OEHHA guidance, cancer risk should not be estimated for projects lasting less than two months due to the uncertainty in assessing very short-term exposures. As stated above, project construction is expected to last 35 months, which is substantially longer than the two-month limitation for short-term exposures recommended by OEHHA.

Therefore, a health risk assessment should be performed to estimate the incremental increase in cancer risk at nearby sensitive receptors (e.g., the Mental Health Center adjacent to the north of the project site and residential buildings five feet to the east of the project site) that would be exposed to DPM emissions during project construction in accordance with the OEHHA guidance. If needed, the health risk analysis should also evaluate the effectiveness of implementing exhaust control measures (e.g., use of Tier 4 engines) to reduce health risks below the SCAQMD’s recommended thresholds of significance.

CONCLUSIONS

Based on our review of the CE analysis regarding noise and air quality impacts for the project, Baseline recommends that the City of Los Angeles prepare an Initial Study to address the environmental concerns described above.

Sincerely,



Patrick Sutton,
Principal Environmental Engineer



Yilin Tian, PhD
Environmental Engineer

⁵ Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February.



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May 8, 2023

VIA EMAIL

City Planning Commission
City of Los Angeles
c/o Stephanie Escobar, Planning Assistant
200 North Spring Street
Los Angeles, CA 90012
stephanie.escobar@lacity.org

Re: Response to SAFER Comment dated May 3, 2023 re Categorical Exemption, 1200 N. Vine Street Project (CPC-2022-7074-CU-DB-SPR-HCA; ENV-2022-7048-CE)

Dear Planning Commissioners:

We represent Vine Street Los Angeles Apts, LLC in conjunction with its proposal to construct a new mixed-use residential building with ground floor commercial uses ("Project") at 1200-1218 N. Vine Street and 6245-6247 W. Lexington Avenue ("Site") in the City of Los Angeles ("City"). Supporters Alliance for Environmental Responsibility ("SAFER") submitted a letter dated May 3, 2023 ("SAFER Letter") regarding the Class 32 Infill Development Categorical Exemption ("Class 32 Exemption") analysis and findings prepared for the Project pursuant to California Environmental Quality Act ("CEQA").¹ The SAFER Letter alleges that the Project does not qualify for the use of the Class 32 Exemption because: 1) the Project would have significant construction noise impacts; 2) the analysis and findings supporting the Project's Class 32 Exemption contain an incomplete health risk impact assessment; and 3) the "unusual circumstances" exception precludes the Project's use of the Class 32 Categorical Exemption. Despite SAFER's claims, this letter demonstrates that the CEQA analysis and findings prepared for the Project substantiate its qualification for the Class 32 Exemption, and SAFER provides no substantial evidence to the contrary.

To address SAFER's comments regarding potential noise and health risk impacts, Doug Kim + Associates, LLC ("DKA") prepared responses confirming the Project's CEQA analysis and findings that the Project would not result in any potentially significant noise or health risk impacts. (See **Attachment A**, DKA Memo.) The DKA Memo first responds to the SAFER Letter's claims related to construction noise, including that the Project findings did not quantify the construction noise reduction associated with the proposed best practice measures and that the analysis did not properly consider the two residential receptors and the Mental Health Center located closest to the Site. Specifically, the DKA Memo demonstrates that the Class 32 Exemption analysis considered the specific equipment mix proposed by the Project, and no significant impacts would result assuming the use of standard construction best

¹ See 14 C.C.R. § 15332.

practices required by the Los Angeles Noise Ordinance (LAMC Section 112.05). As shown in Table 6-5 of the Project's CEQA analysis, which is excerpted in the DKA Memo, the construction of the Project considering the equipment and barriers proposed would increase ambient noise levels at the nearby sensitive receptors by 0.2 (at Receptor No. 5, the hotel at 1133 Vine Street) to 4.1 dBA (at Receptor No. 4, the residences at 6231-39 Lexington Avenue). Therefore, the Project would not result in significant construction noise impacts that exceed the City's 5 dBA over ambient threshold of significance. Further, Table 6-5 confirms that the receptors referenced in the SAFER Letter were already properly and adequately analyzed in the Project's CEQA analysis. For the residences east of the Site, noise measurements were taken and potential impacts were analyzed along the Lexington Avenue frontage, where there is a direct line-of-sight to construction activities. For the Mental Health Center, measurements were taken and potential impacts were analyzed along the Vine Street frontage in the public right-of-way, which provides a conservative estimate of noise exposure as the primary door and openable windows are 140 feet away on La Mirada Avenue facing away from the Site. Therefore, the Project's CEQA analysis and the DKA Memo provide substantial evidence that the Project would not result in potentially significant construction noise related impacts.

The DKA Memo next demonstrates that the SAFER Letter's health risk related comments, specifically that the City was required to prepare a Health Risk Assessment ("HRA") for the Project due to alleged diesel emissions ("DPM"), are not supported by substantial evidence. The DKA Memo explains that pages 2-78 through 2-81 of the Project's Class 32 Exemption findings include extensive analysis of the Project's construction and operational DPM emissions that demonstrate human health impacts from potential emissions of DPM are less than significant. The DKA Memo next points out that the SAFER Letter includes no purported technical analysis whatsoever showing significant DPM-related impacts, nor does any previous letter submitted by SAFER.² The mere assertion that an HRA is required does not establish substantial evidence of an impact. Finally, the DKA Memo discusses how the methodologies relied on by the City for preparation of CEQA air quality analyses (i.e., those established by the South Coast Air Quality Management District ["SCAQMD"], the regional expert air quality agency) do not require an HRA for the Project, a mixed-use infill development in an urbanized area. Therefore, the Project's CEQA analysis and the DKA Memo establish substantial evidence that the Project would not result in potentially significant health risk related impacts.

Finally, the SAFER Letter asserts - without any evidence whatsoever - that due to the existence of the alleged noise and health risk related impacts, the Project involves unusual circumstances that disqualify it from the use of the Class 32 Exemption. As discussed above, the SAFER Letter does not establish substantial evidence that the Project will result in such impacts. Further, the SAFER Letter provides no additional evidence of unusual circumstances. Despite SAFER's claims, the undeniable reality is that Project proposes a mixed-use, mixed income, transit proximate infill project that is consistent with the City's local land use regulations and zoning standards in a highly urbanized area. Therefore, SAFER has not provided any actual evidence that the Project involves unusual circumstances, let alone any that would result in significant impacts that would disqualify the Project from the use of a Class 32 Exemption.

As demonstrated herein, the SAFER Letter does not establish substantial evidence of any potentially significant impact or unusual circumstance, and the Project's Class 32 Exemption analysis and

² SAFER also submitted letters dated December 27, 2022 and February 7, 2023, which do not include issues related to those asserted in the SAFER Letter and have been addressed by previous responses to comments.

Los Angeles City Planning Commission

May 8, 2023

Page 3

the DKA Memo provide substantial evidence that support the findings that the Project qualifies for the Class 32 Exemption.

Sincerely,

Dave Rand

Dave Rand
Partner
of RAND PASTER & NELSON, LLP

DR:smd
Attachments

ATTACHMENT A



DOUGLASKIM+ASSOCIATES,LLC

To: File
From: Douglas Kim, AICP
Date: May 8, 2023
Re: 1200 Vine Street Response to Comments

This memorandum provides responses to comments from the Lozeau Drury LLP letter dated May 3, 2023.

1. Comment: Page 3, Comment I.a. The comment states that the analysis “did not provide specific information as to the noise reduction amounts that could be achieved through use of the best practices technique.”

Response: The Categorical Exemption assumes that construction activities will comply with regulatory measures that reduce noise levels and resulting noise exposure at nearby sensitive receptors. This includes LAMC Section 112.05(a), which limits construction noise from powered equipment to 75 dBA at 50 feet of distance for projects within 500 feet of a residential zone. This provides substantial reductions in noise generation from the construction site, as the building phase would generally produce 87.8 dBA at 50 feet of distance, assuming the use of a crane, two forklifts, and two backhoes.¹ It should be noted that LAMC Section 112.05(a) does not specify the methods that are required to comply with this; rather, it sets a performance standard that can be achieved with a variety of best practices measures.

In order to ensure compliance with the LAMC, the analysis looked at a hypothetical mix of quieter equipment and noise barriers that are commonly-used best practices to reduce sound power and sound pressure, respectively. The Federal Transit Administration finds that noise barriers can reduce noise levels up to 15 dB that can reduce noise levels.² As allowable noise reduction measures from LAMC Section 112.05(a), the analysis also considered use of mufflers, shields, and other noise reduction devices were assumed in order to achieve prescribed noise limits. As illustrated below (from Categorical Exemption Page 2-42, Table 6-5), required best practices measures reduced noise impacts at nearby sensitive receptors to levels ranging from 49.2 dBA L_{eq} at residences on La Mirada Avenue to 64.0 dBA L_{eq} at the Taglyan Complex.

¹ CalEEMod model default construction equipment inventory for Building Construction Phase.

² Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018; Table 4-34.

Construction Noise Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L _{eq})	Existing Ambient Noise Level (dBA L _{eq})	New Ambient Noise Level (dBA L _{eq})	Increase (dBA L _{eq})	Potentially Significant?
1. Taglyan Complex	64.0	68.1	69.5	1.4	No
2. Mental Health Center	58.5	68.1	68.6	0.5	No
3. Early Head Start School	58.6	66.7	67.3	0.6	No
4. Residences – 6231-39 Lexington Ave.	61.4	59.5	63.6	4.1	No
5. Hotel – 1133 Vine St.	53.8	66.7	66.9	0.2	No
6. Residences – 6230-40 Lexington Ave.	60.9	59.5	63.3	3.8	No
7. Hotel – 6326 Lexington Ave.	56.9	57.6	60.3	2.7	No
8. Residences – 6232-38 La Mirada Ave.	49.2	59.5	59.9	0.4	No
Source: DKA Planning, 2022.					

2. Comment: Page 3, Comment I.a. The comment states that the analysis “the CE failed to properly evaluate the noise levels at the nearest sensitive receptors at the two residential receptors located five feet east of the project site, and the Mental Health Center located adjacent to the north of the Project.”

Response: The analysis of construction noise impact is consistent with City guidelines for evaluating impacts under CEQA. The CE did evaluate noise impacts at both adjacent sensitive receptors and six other more distant locations. For the residences east of the Project Site, a noise measurement was taken along the Lexington Avenue frontage in the public right-of-way, as access to the side of the apartment would require trespassing on private property. The noise impacts at this sensitive receptor were analyzed at that same monitoring location along the Lexington Avenue frontage, which would have a direct line-of-sight to construction activities from the Project Site, as it is set back approximately 20 feet from the front property line, granting the façade exposure to adjacent construction activities at the Project Site.

For the mental health center north of the Project Site, a noise measurement was taken along the Vine Street frontage in the public right-of-way as well, as there is no building setback from the common property line shared with the Project Site. Construction noise impacts at this receptor were also analyzed at the noise measurement location, which is near the common property line. This produces a conservative estimate of noise exposure at the mental health facility for two reasons. First, the health facility building is built up to the property line and has no windows or doors on the

facade of the structure facing the Project Site. As such, there would be no sound path from construction activities to workers and visitors in the mental health facility. Instead, building noise insulation from Title 24 and other building and safety measures would substantially reduce any construction noise exposure. Second, the Vine Street building façade's only opening is an entry door for American Disability Act access that is located over 50 feet away from the Project Site boundary. As the primary door and openable windows are 140 feet away on La Mirada Avenue, facing away from the construction site, noise impacts for the mental health center would be even lower than those modeled and summarized in the Categorical Exemption, Page 2-42, Table 6-5).

3. Comment: Page 4, Comment I.b. The comment states that the analysis "would result in Diesel Particulate Matter ("DPM") emissions from the exhaust of off-road diesel construction equipment... [and would] expose sensitive receptors to substantial DPM construction emissions"

Response: The comment claims the City was required to prepare a Health Risk Assessment (HRA) for the Project due to alleged diesel emissions (DPM). This claim fails for several reasons. First, the comment ignores the extensive analysis of the Project's construction and operational DPM emissions in the CE, which determines that human health impacts from potential emissions of DPM are less than significant based on substantial evidence.³ The comment thus yet again fails to meet its burden for this reason, alone.⁴

Second, the comment is not supported by any evidence or technical analysis showing significant DPM-related impacts. The comment instead merely asserts that an HRA was required. A demand for additional testing is not substantial evidence of a significant impact.⁵ The claim that an HRA was required due to significant DPM emissions fails for this additional reason.

Third, the claim that an HRA is required here by any applicable regulation is false. The Department of City Planning relies on methodologies established by the regional expert air quality agency, the South Coast Air Quality Management District (SCAQMD) for preparation of CEQA air quality analyses. SCAQMD published the CEQA Air Quality Handbook in November 1993 to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects proposed in the region. The SCAQMD CEQA Handbook does not recommend analysis of toxic air contaminants (TACs) from short-term construction activities. Rather, as stated in the CE:

SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided

³ See CE, at pp. 2-78 through 2-81.

⁴ Defend the Bay, 119 Cal.App.4th at 1266.

⁵ See, e.g., Parker Shattuck Neighbors v. Berkeley City Council (2013) 222 Cal.App.4th 768, 785–786 ("a suggestion to investigate further is not evidence, much less substantial evidence, of an adverse impact."); Assn. of Irrigated Residents v. County of Madera (2003) 107 Cal.App.4th 1383, 1396 ("CEQA does not require that an agency conduct every recommended test and perform all recommended research in evaluating a project's environmental impacts.")

*guidance for analyzing mobile source diesel emissions. The Project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities.*⁶

The comment also misrepresents the Office of Environmental Health Hazards Assessment (OEHHA) requirements under AB 2588, the Air Toxic Hot Spots Program. AB 2588 only applies to “facilities” as defined in Health and Safety Code Section 44322(a), which the state has determined applies to industrial facilities requiring operational air permits that use, manufacture, formulate, or release certain listed hazardous substances. Covered facilities do not include temporary, short term and intermittent construction impacts resulting from residential or mixed-use residential developments, which are not regulated under the Toxic Hot Spots Program. Notably, the OEHHA Guidelines assess cancer risks over 30-year exposures, they do not mandate analysis for “short-term” projects even under the Toxic Hot Spots Program, and thus the OEHHA Guidelines do not apply here, where the only DPM emissions would occur during a few months of construction activities as part of the Project. Rather, as stated at pages 8-17 and 8-18 of the OEHHA Guidelines, the information regarding “short term” cancer exposures is provided to assist local air districts when they make permitting decisions for projects requiring AQMD permits related to shorter-term exposures, noting also that “there is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime.”

As indicated above, with respect to requiring quantitative HRAs related to DPM emissions from mobile sources – which describes the pollutant and type of source at issue here – SCAQMD only requires quantitative HRAs to be prepared for substantial mobile sources of DPM emissions, including truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units.⁷ SCAQMD’s AB 2588 Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics Hot Spots Information and Assessment Act only applies to permitted industrial facilities and does not address so called “short term” projects.⁸

SCAQMD Rule 1402, which implements the Toxic Hot Spots Program in the region, only applies to facilities with one or more AQMD permits to operate, which the Project is not required to obtain, and also does not require analysis of short-term TAC or DPM emissions. Thus, the comment’s assertion that a quantitative HRA is required for the Project is incorrect, as no agency has recognized the short term, temporary and intermittent DPM impacts resulting from the

⁶ CE, at p. 2-81 (citing South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.)

⁷ SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, 2002, found at <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>, last accessed Nov. 14, 2022.

⁸ SCAQMD, *AB 2588 and Rule 1402 Supplemental Guidelines (Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics Hot Spots Information and Assessment Act)*, October 2020, found at <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab-2588-supplemental-guidelines.pdf>, last accessed Nov. 14, 2022.

construction of infill mixed-use residential development as a significant source of toxic air emissions requiring quantitative HRAs. As Project construction activities would vary throughout the site and would be short-term during only one brief portion of onsite construction activities, stationary source rules would not be appropriate for assessing impacts associated with DPM and an HRA is not required.

DAY OF HEARING SUBMISSIONS



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March 10, 2023

VIA EMAIL

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**Re: Comment on Infill Exemption for Oxford Apartments Project (CPC-2022-8155-CU-DB-SPR-VHCA; ENV-2022-8156-CE);
May 11, 2023 City Planning Commission Agenda Item 5b**

Dear President Millman, Vice President Choe, Members of the City Planning Commission, and Ms. Carter:

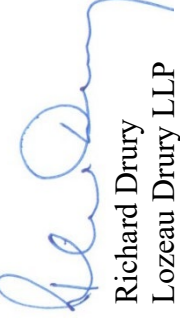
This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER"), regarding the Oxford Apartments Project (CPC-2022-8155-CU-DB-SPR-VHCA; ENV-2022-8156-CE), including all actions related or referring to the proposed development of a seven-story, 134,788 square-foot residential building with 101 dwelling units over one level of subterranean parking, located at 308 – 320 North Oxford Avenue and 311 – 321 North Serrano Avenue in the City of Los Angeles ("Project"), which is scheduled to be heard by the City Planning Commission on May 11, 2023 as Agenda Item 5b.

SAFER objects to the City's decision to exempt the Project from environmental review under the California Environmental Quality Act ("CEQA") based on a Class 32 Categorical Exemption (In-fill Development). Exempting the Project from CEQA based on the Class 32 Exemption violates CEQA because terms of the Class 32 exemption do not apply. SAFER requests that an initial study be conducted and a CEQA document prepared to analyze and mitigate the Project's environmental impacts. The City Planning Commission should decline to approve the Project until proper CEQA review is completed.

May 10, 2023

Comment on CEQA Class 32 Infill Exemption - Oxford Apartments Project (CPC-2022-8155-
CU-DB-SPR-VHCA; ENV-2022-8156-CE
Planning Commission Agenda Item 5b
Page 2 of 2

Sincerely,



Richard Drury
Lozeau Drury LLP



Department of City Planning

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

May 10, 2023

TO: City Planning Commission

FROM: Michelle Carter, City Planner

ADDITIONAL INFORMATION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2022-8155-CU-DB-SPR-PHP-VHCA; 308 – 320 NORTH OXFORD AVENUE; 311 – 321 NORTH SERRANO AVENUE.

Transmitted herewith, are attachments to Exhibit B ENV-2022-8156-CE to be considered at the City Planning Commission meeting of May 11, 2023, related to Item No. 05b on the meeting agenda.

**HISTORICAL RESOURCES ASSESSMENT REPORT FOR
308-318 N. OXFORD AVENUE AND 311 N. SERRANO AVENUE
LOS ANGELES, CALIFORNIA 90004**

PREPARED FOR:

**MS. ELISA PASTER
633 WEST FIFTH STREET
64TH FLOOR
LOS ANGELES, CA 90071**

PREPARED BY:

**SAPPHOS ENVIRONMENTAL, INC.
430 NORTH HALSTEAD STREET
PASADENA, CALIFORNIA 91107**

MAY 2, 2023

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ATTACHMENTS

A Resumes of Key Personnel

SECTION 1 EXECUTIVE SUMMARY

This Historical Resources Assessment Report (HRAR) presents the results of a historical resources assessment for a multi-family residential property located at 318 N. Oxford Avenue (Assessor's Parcel Number [APN]: 5521-028-014), City of Los Angeles (City), Los Angeles County, California. Two additional properties, 308 N. Oxford Avenue and 311 N. Serrano Avenue (APNs: 5521-028-003 and -021), are also included in the proposed project. The purpose of this HRAR is to determine if the buildings individually constitute historical resources pursuant to Section 15064.5(a) of the California Environmental Quality Act (CEQA) Guidelines. Sapphos Environmental, Inc. (Mr. Scott Torres and Ms. Carrie Chasteen; Attachment A, *Resumes of Key Personnel*) was retained to serve as the principal investigator to complete the HRAR. Mr. Torres and Ms. Chasteen meet the Secretary of the Interior's *Professional Qualification Standards* in the fields of History and Architectural History. The subject properties were not identified as significant in the 2015 SurveyLA Historic Resources Survey Report – Wilshire Community Plan Area.¹ 308 N. Oxford Avenue and 311 N. Serrano Avenue were constructed in the 1980s or substantially altered, and do not possess exceptional significance for consideration as historical resources. Therefore, the focus of this study is on the buildings located at 318 N. Oxford Avenue. After careful research based on City building permit review, Los Angeles County Assessor information, ProQuest newspaper archives, Sanborn fire insurance maps, Sapphos Environmental, Inc. has determined that subject property does not appear to be an eligible resource pursuant to criteria for the National Register of Historic Places or California Register of Historical Resources, or for designation as a City of Los Angeles Historic-Cultural Monument or as historical resources pursuant to Section 15064.5(b) of the CEQA Guidelines. Therefore, the proposed demolition of the buildings on the site and development of a low-income apartment building would not result in an indirect or direct substantial adverse change to a historical resource pursuant to Section 15064.5(b) of the CEQA Guidelines.

The building located at 308 N. Oxford Avenue (APN: 5521-028-021) did not merit an evaluation due to being less than 50 years old. Furthermore, the building was not identified as an eligible resource in the 2015 SurveyLA Historic Resources Survey Report – Wilshire Community Plan Area. Therefore, the building does not appear to be an eligible resource pursuant to criteria for the National Register of Historic Places or California Register of Historical Resources, or for designation as a City of Los Angeles Historic-Cultural Monument or as a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines.

The building at 311 N. Serrano Avenue (APN: 5521-028-003) did not merit an evaluation due to substantial alteration that occurred over time, it does not convey or embody the feeling of a single-family residence associated with Early Single-Family and Multi-Family Development, 1880-1930. The building was not identified as an eligible resource in the 2015 SurveyLA Historic Resources Survey Report – Wilshire Community Plan Area. Therefore, the building does not appear to be an eligible resource pursuant to criteria for the National Register of Historic Places or California Register of Historical Resources, or for designation as a City of Los Angeles Historic-Cultural Monument or as a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines.

¹ City of Los Angeles Department of City Planning, Office of Historic Resources. 23 January 2015. SurveyLA Historic Resources Survey Report – Wilshire Community Plan Area. Prepared by: Architectural Resources Group, Inc., Pasadena, CA. Available at: https://planning.lacity.org/odocument/ab2f5674-8968-4e77-ad10-1557b6107f67/SurveyLAWilshire_SurveyReport_.pdf

The buildings on the subject property do not meet one or more eligibility criteria to merit consideration as a historical resource pursuant to CEQA (Section 10564.5(a) of the CEQA Guidelines). The presence of the artesian water was discovered through wildcatting, or the random exploratory drilling to find oil in the early 1900s and is not known to be a naturally occurring at-grade water source. Based on a review of historic topographic maps, naturally occurring sources of fresh water, which are typically associated with Native American habitation sites, are not known to be located at this site. Therefore, the archaeological sensitivity of the site is low due to the unknown presence of water and disturbance associated with the continued (re)development of the sites. Additionally, based on a review of the historic topographic maps, no known cemeteries are located within the project site or its immediate vicinity. Therefore, the project will not result in a substantial adverse change to a historical resource as defined in Section 15064.5(b) of the CEQA Guidelines.

SECTION 2

PROJECT SUMMARY AND LOCATION AND DESCRIPTION

2.1 PROJECT DESCRIPTION

The applicant proposes to demolish the buildings on the site and construct a new low-income 101-unit multi-family apartment building that will include above-ground and subterranean parking to accommodate over 150 vehicles.

2.2 PROJECT LOCATION AND CURRENT SETTING

The project location consists of three parcels located at 308 and 318 N. Oxford Avenue (APNs: 5521-028-021 and 5521-028-014) and 311 N. Serrano Avenue (APN: 5521-028-003) in the City, Los Angeles County, California. (Figure 1, *Sketch Map*; Figure 2, *Project Location Map*).



Figure 1. Sketch Map
 SOURCE: Sapphos Environmental, Inc., 2023

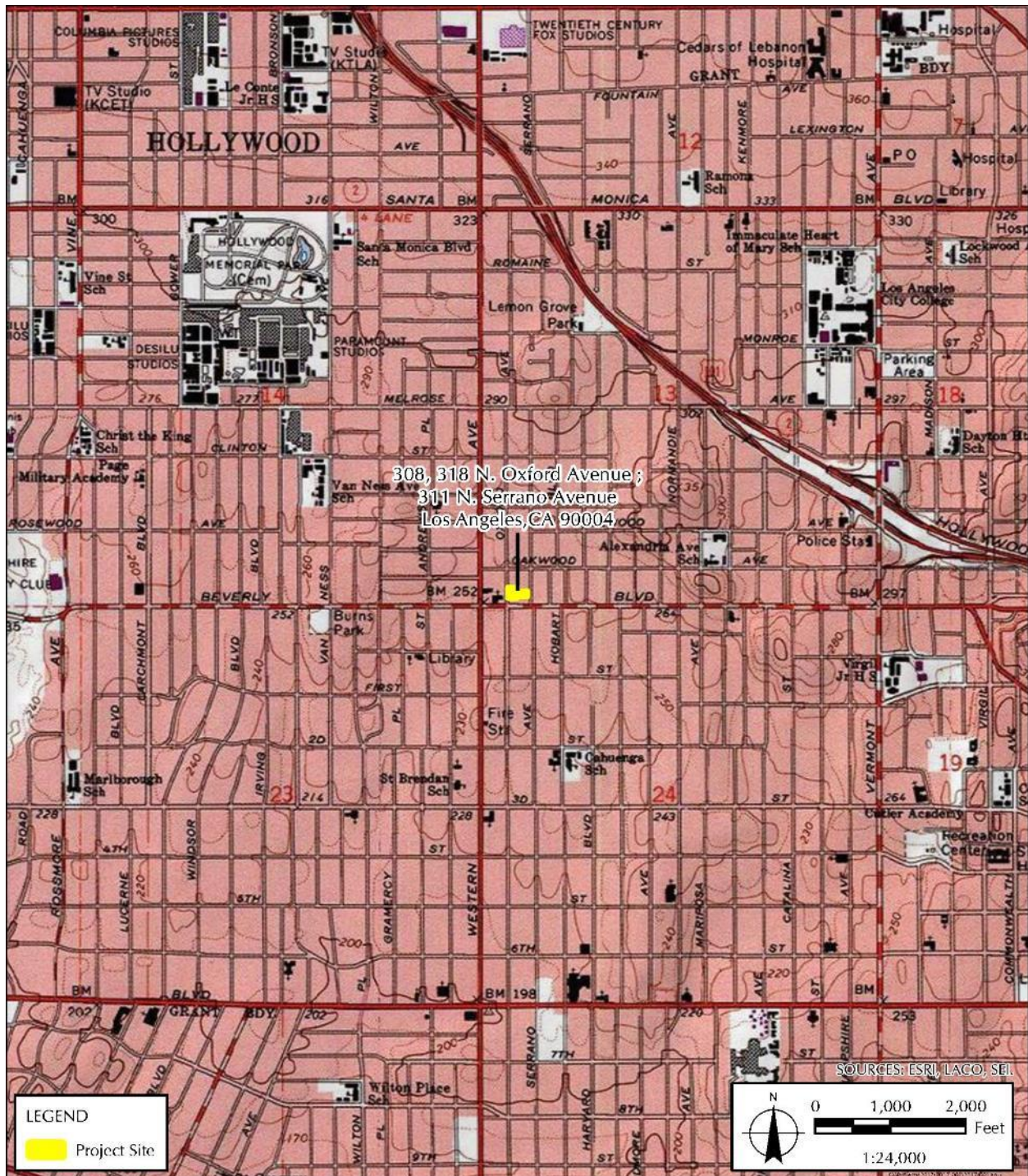


Figure 2. Project Location Map
SOURCE: U.S. Geological Survey, 1991

SECTION 3

CURRENT SETTING

The subject property is in the Wilshire Community Plan Area (CPA). The area is densely populated with single-family, multi-family residential buildings, and commercial buildings closer to Beverly Boulevard. The subject property is located between Beverly Boulevard to the south and Melrose Avenue to the north (Figures 3A–C, *Setting*).



Figure 3A. Setting, N. Oxford Avenue (view south)
SOURCE: Google Maps, 2022

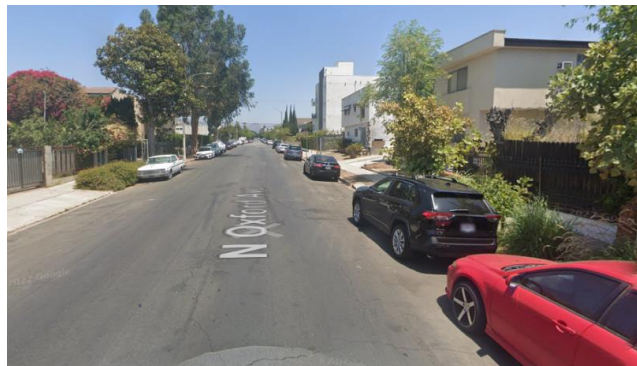


Figure 3B. Setting, N. Oxford Avenue (view north)
SOURCE: Google Maps, 2022



Figure 3C. Setting, N. Serrano Avenue (view north)
SOURCE: Google Maps, 2022

SECTION 4

METHODOLOGY

The assessment methodology consisted of research and field assessment of the buildings located on the property.

Research Conducted

1. Obtained and reviewed the building permits for the parcel from the City Department of Building and Safety. Dates of construction and subsequent alterations were determined by the building permit record, as well as additional resources, such as the field inspection, Sanborn fire insurance maps, and historic aerial photographs.
2. Researched the project site and surrounding area at local libraries and archives to establish the general history and context of the project site, including a review of the Built Environment Resource Directory (BERD) for Los Angeles County, newspapers, City directories, books, and articles.
3. Consulted the Context/Theme/Property Type (CTP) eligibility standards formulated for the Los Angeles Historic Context Statement to identify the appropriate CTP under which to evaluate the buildings on the project site.
4. Reviewed and analyzed ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation assessment processes and programs to evaluate the significance and integrity of the buildings on the project site.

Field Methods

1. Conducted a field inspection of the project site on April 26, 2023, to ascertain the general condition and physical integrity of the buildings and landscaping thereon. Digital photographs were taken during the site inspection, which included only the exterior of the buildings and public spaces. Field notes were made.

SECTION 5 REGULATORY FRAMEWORK

5.1 FEDERAL

The National Historic Preservation Act of 1966, as amended, defines the criteria to be considered eligible for listing in the National Register:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

- 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 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 (36 Code of Federal Regulations [CFR] Section part 63).*

According to *National Register Bulletin No. 15*, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity.” Integrity is defined in *National Register Bulletin No. 15* as “the ability of a property to convey its significance.”² *National Register Bulletin 15* states, “To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance.”³ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: *location, design, setting, materials, workmanship, feeling, and association*.

² National Park Service, U.S. Department of the Interior. 2017. “How to Apply the National Register Criteria for Evaluation.” *National Register Bulletin*. Available at: <https://www.nps.gov/nr/publications/bulletins/nrb15/>

³ National Park Service, U.S. Department of the Interior. 2017. “How to Apply the National Register Criteria for Evaluation.” *National Register Bulletin*. Available at: <https://www.nps.gov/nr/publications/bulletins/nrb15/>

5.2 STATE OF CALIFORNIA

Section 5024.1(c), Title 14 CCR, Section 4852 of the California Public Resources Code defines the criteria to be considered eligible for listing in the California Register:

A resource may be listed as an historical resource in the California Register if it meets any of the following [National Register] criteria:

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

Section 4852(C) of the California Code of Regulations⁴ defines integrity as follows:

Integrity is the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources eligible for listing in the California Register must meet one of the criteria of significance described in section 4852(b) of this chapter and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.

Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance.

⁴ California Office of Historic Preservation. 1999. *California State Law and Historic Preservation*, 4853 (c), p.66.

5.3 CITY OF LOS ANGELES

Historic-Cultural Monument. Section 22.171.7 of the City Cultural Heritage Ordinance defines an HCM:

For purposes of this article, a Historic-Cultural Monument (HCM) 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:

- (a) 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;*
- (b) Is associated with the lives of historic personages important to national, state, city, or local history; or*
- (c) 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.*

Unlike the National and California Registers, the City Cultural Heritage Ordinance makes no mention of concepts such as integrity or period of significance. Additionally, properties do not have to reach a minimum age, such as 45 to 50 years, to be designated as HCMs.

Historic Preservation Overlay Zone. The City has established 36 HPOZs, or historic districts. City Ordinance No. 175891 amended Section 12.20.3 of the City's municipal code regarding HPOZs. The purpose of the ordinance was stated as:

It is hereby declared as a matter of public policy that the recognition, preservation, enhancement, and use of buildings, structures, Landscaping, natural features, and areas within the City of Los Angeles having Historic, architectural, cultural, or aesthetic significance are required in the interest of the health, economic prosperity, cultural enrichment, and general welfare of the people.

Contributing elements are defined as any building, structure, landscape, or natural feature identified in a historic resource 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.

SECTION 6 RECORDS SEARCH

6.1 RECORDS SEARCH

In accordance with the South Central Coastal Information Center (SCCIC), located at California State University, Fullerton, current procedures and policies, the BERD for Los Angeles County, available from the California Office of Historic Preservation (updated September 23, 2022), historic U.S. Geological Survey (USGS) 7.5-minute series topographic maps, and aerial photographs were reviewed for the project site and adjacent properties. In addition to official maps and records, and published registers and reports for the geographic area were reviewed:

1. National Register of Historic Places – Listed (2023);
2. California Register of Historical Resources – Listed (2023);
3. California State Historical Landmarks (1996 and updates);
4. California Points of Historical Interest (1992 and updates);
5. HistoricPlacesLA (2023); and
6. Historic Resources Survey, Wilshire Community Plan Area (2015).

6.2 PREVIOUS EVALUATIONS/DESIGNATIONS SUMMARY

The properties were not identified in the 2015 SurveyLA Historic Resources Survey Report – Wilshire Community Plan Area.⁵ The subject property has not been previously evaluated outside of SurveyLA, which did not identify it as a potentially significant resource.

⁵ City of Los Angeles Department of City Planning, Office of Historic Resources. 23 January 2015. SurveyLA Historic Resources Survey Report – Wilshire Community Plan Area. Prepared by: Architectural Resources Group, Inc., Pasadena, CA. Available at: https://planning.lacity.org/odocument/ab2f5674-8968-4e77-ad10-1557b6107f67/SurveyLAWilshire_SurveyReport_.pdf

SECTION 7

HISTORY AND DESCRIPTION OF SURROUNDING AREA

7.1 DEVELOPMENT HISTORY

The subject property is located within the Allan-Dale Tract. The tract was platted in 1906 for H.J. Stocker. The tract was owned by Title Insurance and Trust and was apparently sold to W.H. Allen & Son that same year. According to the *Los Angeles Times*, initial advertisements for the Allan-Dale Tract in 1906⁶ boasted large level lots, cement sidewalks and curbs, and graveled and oiled streets. An additional real estate advertisement, also from 1906,⁷ revealed that there was an abundance of artesian water that would remain free to lot owners for five years. According to the Beverly Hot Springs (308 N. Oxford Avenue) website, a natural hot spring provides the water for the spa services. The spa's website mentions the spring was discovered by Richard S. Grant as he began to develop a parcel purchased in 1910. A *Los Angeles Times* article from 1909⁸ indicates Richard S. Grant purchased a 50- by 135-foot lot located on the west side of Oxford Avenue between Temple and Barrow streets. An additional article indicated that Grant purchased an additional lot on the northeast corner of Oxford Avenue and Temple Street. In 1972,⁹ an article in the *Los Angeles Times* revealed that the discovery of the well was the result of a "wildcatters" dream and instead of oil, water was discovered. The *Los Angeles Times* article did not identify who found the well but approximated the discovery to around 1900. A 2021 *Los Angeles Times* article¹⁰ reveals residents of the Allan-Dale Tract consumed the water from the natural spring until the City installed water mains in 1915. According to the *Los Angeles Times*, over a quarter million gallons of surging water supplied residents with hot water. The natural spring water was bottled and labeled "Wonder Water" by the Angelus Beverage Co. The spring water continued to be bottled and sold by the Best Drinking Water Co. The Best Drinking Water Co. constructed its bottling building at 308 N. Oxford Avenue in 1946.¹¹ Based on a review of Sanborn fire insurance maps, most of the lots in the tract were developed with single-family residences by 1919, and by 1955, the tract was completely developed with single-family residences and modest multi-family buildings (Figure 4, *Alan-Dale Tract, 1906*; Figure 5, *Sanborn Fire Insurance Map*).

⁶ "For Sale City Lots and Lands: For Sale by W.H. Allen and Son, Allan-Dale Tract ." 5 September 1906. *Los Angeles Times*, p.10.

⁷ "For Sale: Allan-Dale Tract." 6 August 1906. *Los Angeles Times*, p.10.

⁸ "Allan Dale Tract Sales." 17 October 1909. *Los Angeles Times*, p.94.

⁹ "A Way Out Well: Use Sought for Natural Well." 14 May 1972. *Los Angeles Times*, p. J10.

¹⁰ "From Sacred to Profane: A Brief History of Southern California's Hot Springs." 28 December 2021. *Los Angeles Times*.

¹¹ City of Los Angeles. Issued 1946. Building Permit No. 1946LA20375.

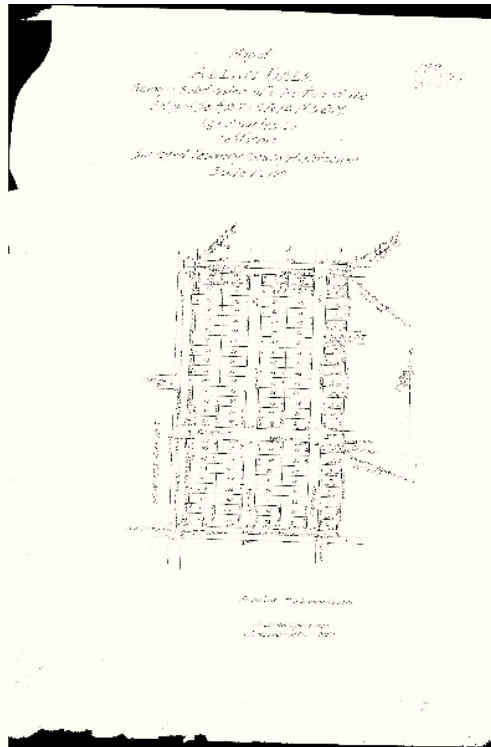


Figure 4. Allan-Dale Tract, 1906
SOURCE: *Los Angeles Public Works*

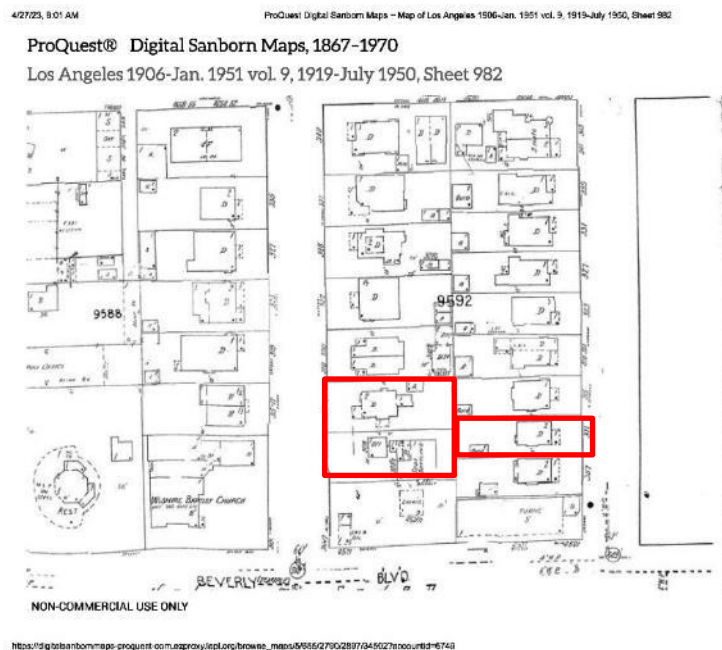


Figure 5. Sanborn Fire Insurance Map (Los Angeles, 1919-July 1950, Vol. 9., Sheet 982)
SOURCE: ProQuest¹²

¹² Sanborn Map Company. 1919-July 1950. Los Angeles. Fire Insurance Map, Vol. 9, Sheet 982. ProQuest Digital Sanborn Maps, 1867–1970. Accessed April 2023. Available at: <https://digitalsanbornmaps.proquest.com>

SECTION 8

DESCRIPTION OF EVALUATED RESOURCE

8.1 ARCHITECTURAL DESCRIPTION

308 N. Oxford Avenue

The building located at 308 N. Oxford Avenue was constructed in 1986.¹³ A permit was issued to construct a 2-story building to be utilized as a health spa. The building is clad in smooth stucco and features a flat roof (Figure 6). The building also contains various rectangular metal windows that are vertically and horizontally oriented. The building also features exposed metal beams that in addition to their structural purpose, serve as a trellis along the entry way and northern elevation of the building. The building has an asymmetrical footprint and measures 12,280 square feet.



Figure 6. 308 N. Oxford Avenue (view west)
SOURCE: Sapphos Environmental, Inc., 2023

318 N. Oxford Avenue

Primary Façade

This parcel is narrow but deep; photography was difficult due to physical constraints and dense vegetation. The primary building is a 2-story duplex that is 2,485 square feet. The building features modest Spanish Colonial Revival-style features. The building is clad in smooth stucco and features a flat roof with a parapet. The building's first- and second-story arcades are visible from the public right-of-way (Figure 7). The cement porch located on the primary entry way of the building was added in 1928 (Figure 8). Both the first- and second-story entry doors are obscured behind metal security doors. The building features numerous rectangular windows on both levels. Various windows include metal security bars (Figure 9). A permit from 1985¹⁴ indicates all the windows on the building were replaced with aluminum windows in addition to a major interior renovation. Metal security bars appear to have been added after the installation of the aluminum windows in 1985. The parapet features piers that extend vertically that feature what appears to be wood balustrades in some sections. An additional entry way and porch is located on the southeast corner of the façade that features a smooth wood door and a tile clad porch (Figure 10). The wingwall also features an arched entry way.

¹³ City of Los Angeles. Issued 14 April 1985. Building Permit No. 1985LA10167.

¹⁴ City of Los Angeles. Issued 14 August 1985. Building Permit No. 1985LA18134.



Figure 7. 318 N. Oxford Avenue Primary Façade (view east)
 SOURCE: Sapphos Environmental, Inc., 2023



Figure 8. 318 N. Oxford Avenue Entryway Arcade and Cement Porch Addition (view east)
 SOURCE: Sapphos Environmental, Inc., 2023



Figure 9. 318 N. Oxford Avenue Primary Façade Windows (view east)
 SOURCE: Sapphos Environmental, Inc., 2023

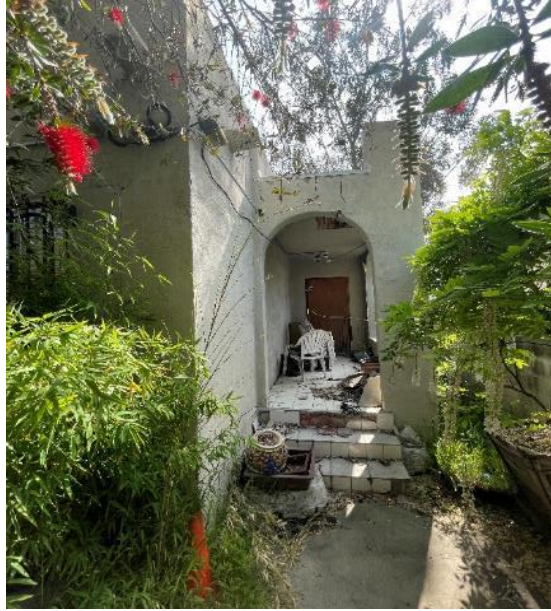


Figure 10. 318 N. Oxford Avenue Primary Façade Rear Entry and Porch (view east)
 SOURCE: Sapphos Environmental, Inc., 2023

Southern Façade

The southern façade of the building features an arcade and two aluminum sliding windows that remain obscured behind metal security bars (Figures 11–12). The façade is clad in smooth stucco and contains metal downspouts and drains. Two rectangular ventilation grilles are located below the roofline.



Figure 11. 318 N. Oxford Avenue Southern Façade (view northeast)
 SOURCE: Sapphos Environmental, Inc., 2023



Figure 12. 318 N. Oxford Avenue Southern Façade (view north)
 SOURCE: Sapphos Environmental, Inc., 2023

Eastern Façade

The eastern façade is simple and devoid of design features beyond an aluminum sliding window, a water heater closet, a rear egress door, and a cement porch (Figure 13A). The cement porch features a metal handrail (Figure 13B). Ventilation grilles are also located beneath the roofline.



Figure 13A. 318 N. Oxford Avenue Eastern Façade (view west)
 SOURCE: Sapphos Environmental, Inc., 2023



Figure 13B. 318 N. Oxford Avenue Eastern Façade (view west)
 SOURCE: Sapphos Environmental, Inc., 2023

Northern Façade

The northern façade features numerous aluminum windows that are obscured behind metal security bars (Figure 14). The second story windows do not have metal security bars installed. The façade also features sections of the parapet that have wood balustrades. The façade also includes metal downspouts and drains. The façade was inaccessible due to a locked gate that prohibited pedestrians from entering.



Figure 14. 318 N. Oxford Avenue Northern Façade (view southwest)
 SOURCE: Sapphos Environmental, Inc., 2023

The additional building on the lot once served as the garage. A permit was issued in 1923 to convert a private garage on the property into a dwelling with a private garage. The building is clad in smooth stucco and features a flat roof, multiple entrance doors, and aluminum windows (Figure 15). The building also features an additional staircase and second-floor entrance on its southern façade. The second-floor entrance landing and staircase has a metal hand and guard rail (Figure 16). It appears the original garage and garage door openings have been altered to provide separate entry doors to split the building into separate living spaces for tenants in addition to the side entry and staircase. The building also includes a laundry room space located behind a chain link fence on the western façade of the building. It appears the original garage has been split into three additional living spaces. The alteration to the original detached auto garage is a major alteration that takes away from the feeling of this residential development.



Figure 15. 318/320 N. Oxford Avenue Additional Building Northern Façade (view east)
SOURCE: Sapphos Environmental, Inc., 2023

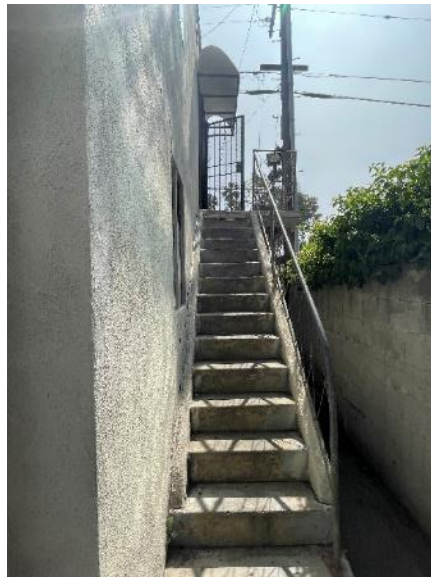


Figure 16. 318/320 N. Oxford Avenue Additional Building Side Entry and Staircase (view east)
SOURCE: Sapphos Environmental, Inc., 2023

311 N. Serrano Avenue

The building is a rectangular building clad in smooth stucco that is devoid of architectural design features associated with a style of architecture nor common designs observed throughout the entirety of the Allan-Dale Tract (Figures 16A–B). According to the Los Angeles County Assessor records, the original building was constructed as a single-family residence in 1913. The building does not feature additional aspects of design beyond minimal window fenestration patterns and a concrete staircase with a metal handrail.



Figure 17A. 311 N. Serrano Avenue
SOURCE: Sapphos Environmental, Inc., 2023



Figure 16B. 311 N. Serrano Avenue
SOURCE: Sapphos Environmental, Inc., 2023

9.1 CONSTRUCTION HISTORY

The Los Angeles County Assessor Portal and City Department of Building and Safety records of historic permits were reviewed.

308 N. Oxford Avenue

The building located at 308 N. Oxford Avenue was constructed in 1986. Prior to the construction of the current building on the lot, the Best Drinking Water Co. had its bottling building on the site. The building was constructed in 1946¹⁵ and demolished in 1985.¹⁶ No remaining material or evidence of the bottling building remains on the site. A permit was issued in 1985¹⁷ to construct the current building that is on the lot. An affidavit found in the City records reveal that in 1985¹⁸ a lot tie was completed to connect 308 N. Oxford Avenue and 311 N. Serrano Avenue. The building is not 50 years or older and was not identified as an eligible resource in the 2015 SurveyLA Historic Resources Survey Report – Wilshire Community Plan Area. Initial advertisements for lot development in 1906, for the Allan-Dale tract indicated an artesian spring supplied water to the tract. The spring water was free to lot owners for the first five years of ownership. An additional *Los Angeles Times*¹⁹ article revealed that Richard S. Grant discovered the spring on a lot he purchased for development. Grant noticed a capped pipe sticking up out of the ground. Grant removed the cap and natural spring water began to gush from the pipe. Addition records indicate that the water source was discovered by Wildcatters looking for oil in 1900. Grant operated a fountain on his residence and gave the natural spring water away to Allan-Dale locals for free. According to the *Los Angeles Times* natural hot springs discovered in Los Angeles and nearby communities created a health-craze that encouraged citizens to consume, wade, and bath in the natural springs. The spring discovered in the Allan-Dale tract does not appear to be a significant spring compared to the nearby Bimini Hot Springs located on Vermont between Wilshire Boulevard and First Street; and the Radium Sulphur Springs located on Melrose Ave and Gower Street. The Bimini Bath and Radium Sulphur Springs offered wading pools and bottled spring water. Grant ceased giving water away when the City installed water mains to the area in 1915. The water was eventually bottled and sold as “wonder water” and later the Best Water Company established its bottling and storage building in the tract in 1946. Hot spring water wasn’t utilized as a means of health and wellness until the construction of the Beverly Hot Springs Spa in 1986. The discovery of natural spring water in the early 1900s and the subsequent construction of health and wellness facilities in Los Angeles were not identified as significant in any SurveyLA context. The construction of the building in 1986 was not associated with broad patterns that contributed to national, state, and local history. The building was not found to be associated with a person(s) important in our past. The architectural style and construction of the building are not included in the Architecture and Engineering and Commercial Development themes, 1850–1980. Due to the construction date occurring beyond the period of significance, criteria for eligibility

¹⁵ City of Los Angeles. Issued 1946. Building Permit No. 1946LA20375.

¹⁶ City of Los Angeles. Issued 27 March 1985. Building Permit No. 1985LA09410.

¹⁷ City of Los Angeles. Issued 14 April 1985. Building Permit No. 1985LA10167.

¹⁸ City of Los Angeles Department of Building and Safety Affidavit. Issued 15 April 1985. AFF58344.

¹⁹ “A Way Out Well: Use Sought for Natural Well.” 14 May 1972. *Los Angeles Times*, p. J10.

have not been established for buildings constructed after 1980 by SurveyLA. Therefore, the building does not appear to be an eligible resource pursuant to criteria for the National Register or California Register, or for designation as a City of Los Angeles HCM or as a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines.

318 N. Oxford Avenue

Based on the City permit record and assessor information, this building is the only one that requires an evaluation for its eligibility as a potential resource pursuant to national, state, and local evaluation criteria. The duplex building located at 318 N. Oxford Avenue was constructed in 1920.²⁰ The owner of the building Claude R. Richmond identified himself as the contractor and Thomas Jewell was the architect associated with the design. Ancestry directory records reveal that in 1920,²¹ Thomas Jewell was employed as an architect in the County of Los Angeles. Articles found in the *Los Angeles Times* reveal Jewell was associated with two design and construction projects in Los Angeles. One project was a multi-family flat complex and the other was a commercial building intended to house music studios. There is no additional information available in historical newspapers or HistoricPlacesLA to assert that Jewell was a master architect or was associated with significant designs in the City. Ancestry directories identify Richmond as a contractor. Richmond was not found in newspaper articles to be associated with significant construction projects in the City. Therefore, it appears that Richmond was not a master builder. Additional permits reveal the building has been substantially altered (Table 1, *Building Permits and Alteration History for 318 N. Oxford Avenue*).

TABLE 1
BUILDING PERMITS AND ALTERATION HISTORY FOR 318 N. OXFORD AVENUE

Permit No.	Date Issued	Description
1920LA22729	11/18/1920	Construct a 38' x 57' 1-story, 2-family residence.
1923LA21604	05/11/1923	Convert a private garage on the property into a dwelling with private garage.
1928LA07273	03/12/1928	Add two bedrooms, bathroom, dressing room, and front porch with cement steps.
1931LA17383	08/26/1931	Complete an interior flooring renovation.
1985LA18134	08/14/1985	Remove bearing walls to enlarge family bedrooms and replace windows with aluminum windows.

311 N. Serrano Avenue

The building located at 311 N. Serrano Avenue was constructed in 1913 and altered in 1926. The original building permit for a single-family residence is not available, and the architect and builder cannot be identified. A review of historical newspaper articles and building permits reveal limited information regarding the development of the parcel. The limited building permit records reveal that the use of the building changed multiple times between 1913 and 1983. A permit issued in 1983²² reveals the building was an art gallery and was to be changed to a coffee shop and later converted into a storage building in 1989.²³ The building does not appear to be associated with broad patterns

²⁰ City of Los Angeles. Issued 18 November 1920. Building Permit No. 1920LA22729.

²¹ Ancestry. 2010. *1920 United States Federal Census* [database on-line]. Provo, UT: Ancestry.com Operations, Inc. Images reproduced by FamilySearch.

²² City of Los Angeles. Issued 2 December 1983. Building Permit No. 1983LA78208.

²³ City of Los Angeles. issued 29 August 1989. Building Permit No. 1989LA40778.

that contributed to national, state, and local history. The building was not found to be associated with a person(s) important in our past. The building was altered and stripped of any character-defining features to identify a particular architectural style and period of significance. The current features of the building include a floating concrete staircase and rectangular metal windows. Based on the contemporary design and material used, the alterations appear to have been completed outside the period of significance for Early Single-Family and Multi-Family Development, 1880–1930. The building does not convey or embody the feeling of a single-family residence associated with the period of significance, 1880–1930. Therefore, the building does not appear to be an eligible resource pursuant to criteria for the National Register or California Register, or for designation as a City of Los Angeles HCM or as a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines.

9.2 IDENTIFICATION OF ARCHITECTS/BUILDERS

308 N. Oxford Avenue

The architect associated with the design of the building is Jungsoo Kwak AIA, and the builder is D.Y. Construction.

318 N. Oxford Avenue

The architect associated with the design of the building is Thomas Jewell, and the builder is the property owner Claude R. Richmond. Jewel was employed as an architect in the County of Los Angeles. Articles found in the *Los Angeles Times* reveal Jewell was associated with two design and construction projects in Los Angeles. One project was a multi-family flat complex and the other was a commercial building intended to house music studios. There is no additional information available in historical newspapers or HistoricPlacesLA to assert that Jewell was a master architect or was associated with significant designs in the City. There is no information available in ancestry directories or newspaper articles regarding the profession of Claude R. Richmond. Therefore, it appears that Richmond was not a master builder.

311 N. Serrano Avenue

The building located at 311 N. Serrano Avenue was constructed in 1913 and altered in 1926. The original building permit for a single-family residence is not available, and the architect and builder cannot be identified. A permit issued in 1983²⁴ reveals the building was an art gallery, converted into a coffee shop, and later became a storage building in 1989.²⁵

9.3 OWNERSHIP HISTORY

Historic Assessor records were not available at the time this study was prepared due to the current closure of public buildings. The following is an abbreviated ownership history compilation based on data available in historic building permits. Because 308 N. Oxford Avenue and 311 N. Serrano Avenue are not 50 years of age and do not possess exceptional significance, this ownership history focuses on 318 N. Oxford Avenue.

²⁴ City of Los Angeles. Issued 2 December 1983. Building Permit No. 1983LA78208.

²⁵ City of Los Angeles. issued 29 August 1989. Building Permit No. 1989LA40778.

318 N. Oxford Avenue

The limited building permit record and ancestry directories indicate Claude R. Richmond as the owner of 318 N. Oxford Avenue between 1920²⁶ and 1956.²⁷ Additional building records include owner and tenant information for the attached unit, 320 N. Oxford Avenue. A building permit issued in 1985²⁸ reveals the property was owned by Chang Bum Huh. Based on the City building records, it appears that Chang Bum Huh owned the entire duplex building that contained 318 and 320 N. Oxford Avenue. Due to the building being utilized as a duplex over the course of time, additional ancestry records reveal over half a dozen occupants listed either 318 or 320 N. Oxford Avenue as their place of residence for short periods of time. Claude Richmond and Chang Bum Huh do not appear to be individually significant.

9.4 USE HISTORY

The subject property was originally used as a multi-family residence. The subject property is currently being used as such.

²⁶ City of Los Angeles. Issued 18 November 1920. Building Permit No. 1920LA22729.

²⁷ Ancestry. 2017. *California, U.S., Voter Registrations, 1900-1968* [database on-line]. Provo, UT: Ancestry.com Operations Inc.

²⁸ City of Los Angeles. Issued 14 August 1985. Building Permit No. 1985LA18134.

SECTION 10

HISTORIC CONTEXT

The building located at 318 N. Oxford Avenue was evaluated using the Citywide Historic Context Statement developed for SurveyLA; specifically, the Residential Development and Suburbanization Context (Early Residential Development, 1880–1930 Theme) and the Architecture and Engineering Context (Mediterranean & Indigenous Revival Architecture, 1893–1948 Theme; Spanish Colonial Revival, 1912–1948 Sub-Theme).

10.1 EARLY RESIDENTIAL DEVELOPMENT, 1880–1930: EARLY SINGLE-FAMILY AND MULTI-FAMILY RESIDENTIAL DEVELOPMENT²⁹

Summary Statement of Significance: Resources significant within the theme of early residential development include single- and multi-family residences. Properties evaluated under this theme may be significant in the areas of Settlement and/or Community Planning and Development for their association with the earliest periods of residential development in Los Angeles. Although not required, some resources may also be significant examples of their respective styles. Multi-family properties may also represent significant examples of multi-family building types.

Period of Significance: 1880–1930

Period of Significance Justification: Broadly covers the earliest periods of residential development within the present-day boundaries of the City of Los Angeles, and following the City's incorporation in 1850.

Geographic Location: Citywide

Area(s) of Significance: Settlement, Community Planning and Development

Criteria: NR: A CR: 1 Local: 1

Property Type Significance: See Summary Statement of Significance above.

Eligibility Standards:

- Dates from the period of significance
- Represents a very early period of settlement/residential development in a neighborhood or community
- Is a rare surviving and intact example of the type in the neighborhood or community

²⁹ City of Los Angeles Department of City Planning, Office of Historic Resources. September 2017. SurveyLA Historic Resources Survey – Los Angeles Citywide Historic Context Statement: Context; Context: Residential Development and Suburbanization; Theme: Early Residential Development, 1880-1930, p.6–7. Accessed April 2023. Available at: https://planning.lacity.org/odocument/09cf9007-272f-4990-b845-7031b8ed63e4/EarlyResidentialDevelopment_1880-1930_0.pdf

Character-Defining / Associative Features:

- Retains most of the essential physical and character-defining features from the period of significance
- Has an important association with early settlement or residential development within a neighborhood or community
- May also be significant for its association with important early settlers
- May be within an area later subdivided and built out
- Often site in a prominent locations

Integrity Considerations:

- Should retain integrity of *location, feeling, design*, and association
- Some original materials may be altered or removed
- For very early examples, which are increasingly rare, there may be a greater degree of alterations or few extant features
- Setting may have changed (surrounding buildings and land uses)

10.2 MEDITERRANEAN & INDIGENOUS REVIVAL ARCHITECTURE, 1893–1948³⁰

Sub-Theme: Spanish Colonial Revival, 1912–1948

Summary Statement of Significance: A resource evaluated under this sub-theme is significant in the area of Architecture as an excellent example of the Spanish Colonial Revival style. Significant examples exemplify the character-defining features of the style and are often the work of noted architects/builders who made use of these features to give various building types an identification with the styles of Spain, specifically the southern region of Andalusia. Because of its flexibility the Spanish Colonial Revival was widely used for a range of building types and is therefore highly abundant in the parts of the city developed during the period of significance.

Period of Significance: 1912–1948

Period of Significance Justification: The period of significance begins in 1912, when work began on the Southwest Museum, the earliest known example of the style in Los Angeles). Most examples were constructed prior to 1942, when most private building stopped due to World War II; however, known examples date to the late 1940s. Some examples may be identified over time from the 1950s and should be considered although outside the period of significance.

Geographic Location: Citywide, particularly in areas developed during the 1920s and 1930s

Area(s) of Significance: Architecture

Criteria: NR: C CR: 3 Local: 3

Associated Property Type: Residential – Single Family Residential – Multi Family Commercial Industrial Institutional Infrastructure

³⁰ City of Los Angeles Department of City Planning, Office of Historic Resources. November 2018. SurveyLA Historic Resources Survey – Los Angeles Citywide Historic Context Statement: Context; Context: Architecture and Engineering, 1850-1980; Theme: Mediterranean & Indigenous Revival Architecture, 1893-1948, p.31–32. Accessed April 2023. Available at: https://planning.lacity.org/odocument/097f6db5-fee4-43f5-a448-fd140763de90/MediterraneanandIndigenousRevivalArchitecture_1893-1948.pdf

Property Type Description: The style was not limited to specific building types. Spanish Colonial Revival style buildings may be residential, commercial, industrial, or institutional in type. They range from modest- to grand-scale in size.

Property Type Significance: See Summary Statement of Significance above.

Eligibility Standards:

- Was constructed during the period of significance
- Exemplifies the character-defining features of the Spanish Colonial Revival style
- Is an excellent example of the style and/or the work of a significant architect or builder

Character-Defining/Associative Features:

- Retains most of the essential character-defining features of the style
- Typically asymmetrical horizontal assemblage of building masses
- Stucco or plastered exterior walls
- Distinctively shaped and capped chimneys
- Low sloped clay tile roofs or roof trim
- Arched openings, individually serving doors and windows or arranged in arcades
- Towers used as vertical accents to horizontal assemblages
- Patios, courtyards, and loggias or covered porches and or/balconies
- Spare detailing making use of wrought iron, wood, cast stone, terra cotta, polychromatic tile
- Grilles, or rejas, of cast iron or wood over windows and other wall openings
- Attic vents of clay tiles or pipe

Integrity Aspects:

- Should retain integrity of *design, materials, workmanship, and feeling*
- Stucco repair or replacement must duplicate the original in texture and appearance
- Roof replacement should duplicate original in materials, color, texture, dimension, and installation pattern
- New additions should be appropriately scaled and located so as to not overwhelm the original design and massing
- Evolution of plant materials is expected, but significant designed landscapes should be retained
- Original use may have changed
- Setting may have changed (surrounding buildings and land uses)
- Limited window replacement may be acceptable
- Commercial storefronts alterations may be acceptable if most of the original architectural detailing is retained and proportions are not substantially altered
- For residential properties alterations to garages may be permissible
- Security bars may have been added

SECTION 11

EVALUATION OF ELIGIBILITY

11.1 NATIONAL REGISTER OF HISTORIC PLACES

Criterion A

The buildings at 318 N. Oxford Avenue are not eligible for listing in the National Register pursuant to Criterion A. The subject property was constructed 14 years after the Allan-Dale Tract was platted and does not appear to be a significant residential development in the City. The Allan-Dale Tract received minimal mention in the *Los Angeles Times* between 1906 and 1910 for large lots and artesian water that would be free to lot owners for the first five years of ownership. The Allan-Dale Tract did not receive much advertising in regard to a significant residential development in the City. The tract does not appear to have been associated with the streetcar at the time it was platted. The Allandale Tract received mention in later issues of the *Los Angeles Times* regarding the artesian spring water discovered by Richard Grant in 1910. The event of the discovery in 1910 was not mentioned in historical issues of the *Los Angeles Times* or *Los Angeles Sentinel*. In fact, initial real estate advertisements identified the artesian spring water in 1906. Therefore, the discovery of a geo-thermal water source in the Allan-Dale Tract does not appear to have been a significant event in the City. Furthermore, nearby natural hot springs such as the Radium Sulphur Springs located at Melrose Avenue and Gower Street and surrounding Southern California communities advertised health benefits from wading in their pools of natural hot springs. The spring in the Allan-Dale Tract was not utilized as a health retreat/complex. Grant permitted local residents to fill up jugs of spring water from his fountain until the City added municipal water mains to the area in 1915. The water was eventually bottled and sold as “wonder water” and later the Best Water Company established its bottling and storage building in the tract in 1946. The development of the tract was not associated with the discovery of a natural spring, and it was not associated with the health craze that many Angelenos associated with the swimming in and consumption of spring water. Furthermore, hot spring water wasn’t utilized as a means of health and wellness until the construction of the Beverly Hot Springs Spa in 1986, which is located in a separate, detached building on a neighboring parcel. Therefore, the subject property is not eligible for listing in the National Register pursuant to Criterion A.

Criterion B

The building at 318 N. Oxford Avenue is not eligible for listing in the National Register pursuant to Criterion B. Based on a review of the City building permits and historic newspaper articles specific to the subject property, no person/persons of national, state, and local historical significance have been associated with the subject property. Therefore, the subject property is not eligible for listing in the National Register pursuant to Criterion B.

Criterion C

The subject property is not eligible for listing in the National Register pursuant to Criterion C. The subject property was constructed in 1920 and has been substantially altered during and beyond the period of significance identified in SurveyLA for this style of architecture. The alterations to the building include a private garage was converted into a dwelling in 1923; in 1928, two bedrooms, a bathroom, dressing room, and front porch with cement steps were added to the property; in 1931, an interior and flooring renovation was completed; and in 1985, all the original windows were replaced with aluminum windows. The building is not an excellent example of a Spanish Colonial Revival-style building. The building retains subtle design features that mostly include simple arched entry ways and flat roof with parapet. The parapet edge does not feature clay roof tiles along the edge. Clay roofs and tile edges are a common design feature included in Spanish Colonial Revival-style buildings. In fact, the building is devoid of character-defining features observed in modest to excellent examples of Spanish Colonial Revival-style buildings observed throughout Los Angeles and various Southern California communities. Character-defining features of the style commonly include wrought iron, wood, cast stone, terra cotta, polychromatic tile wrought iron grilles; wood detailing; cast stone, terra cotta, polychromatic tile; loggias or other courtyard spaces. Additionally, the garage was split into three additional living spaces. The alteration to the original detached auto garage is a major alteration that takes away from the feeling of this residential development during the period of significance, 1912–1948 identified in SurveyLA. There is also no information available to assert that Thomas Jewell was a master architect. Additionally, the first property owner Claude Richmond was listed as the contractor for the initial construction and subsequent alterations in 1928 and 1931. There is no information available to assert Richmond was a master builder. The property does not appear to be the work of a master architect and builder. The subject property is not an excellent example of a Spanish Colonial Revival-style building that is devoid of significant character-defining features. Therefore, the subject property is not eligible for listing in the National Register pursuant to Criterion C.

Criterion D

Criterion D was not considered in this report as it generally applies to archaeological resources. Additionally, there is no reason to believe the subject property has the potential to yield important information regarding prehistory or history.

11.2 CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register eligibility criteria mirror those of the National Register. Therefore, the subject property is also not eligible for listing in the California Register.

11.3 CITY OF LOS ANGELES HISTORIC-CULTURAL MONUMENTS

Similarly, the City HCM criteria are similar to the National Register and California Register criteria. Therefore, the subject property does not appear to be eligible for designation as a City HCM pursuant to Criterion 1. The subject property was constructed 14 years after the Allan-Dale Tract was platted and does not appear to be a significant residential development in the City. The Allan-Dale Tract received mention in the *Los Angeles Times* between 1906 and 1910 for large lots and artesian water that would be free to lot owners for the first five years of ownership. The Allan-Dale Tract did not receive much advertising in regard to a significant residential development in the City. The tract does not appear to have been associated with the streetcar at the time it was platted. The Allandale Tract received mention in later issues of the *Los Angeles Times* regarding the artesian spring water discovered by Richard Grant in 1910. The event of the discovery in 1910 was not mentioned in historical issues of the *Los Angeles Times* or *Los Angeles Sentinel*. In fact, initial real estate advertisements identified the artesian spring water in 1906. Therefore, the discovery of a geo-thermal water source in the Allan-Dale Tract does not appear to have been a significant event in the City. Furthermore, nearby natural hot springs such as the Radium Sulphur Springs located at Melrose Avenue and Gower Street and surrounding Southern California communities advertised health benefits from wading in their pools of natural hot springs. The spring in the Allan-Dale tract was not utilized as a health retreat/complex. Grant permitted local residents to fill up jugs of spring water from his fountain until the City added municipal water mains to the area in 1915. The water was eventually bottled and sold as “wonder water” and later the Best Water Company established its bottling and storage building in the tract in 1946. The development of the tract was not associated with the discovery of a natural spring, and it was not associated with the health craze that many Angelenos associated with the swimming in and consumption of spring water. Furthermore, hot spring water wasn’t utilized as a means of health and wellness until the construction of the Beverly Hot Springs Spa in 1986, which is located in a separate detached building in a neighboring parcel. Therefore, the subject property does not appear to be eligible for designation as a City HCM pursuant to Criterion 1.

Based on a review of the City building permits and historic newspaper articles specific to the subject property, no person/persons of local historical significance have been associated with the subject property. Therefore, the subject property does not appear to be eligible for designation as a City HCM pursuant to Criterion 2.

The subject property was constructed in 1920 and has been substantially altered during and beyond the period of significance identified in SurveyLA. The alterations to the building include a private garage that was converted into a dwelling in 1923; in 1928, two bedrooms, a bathroom, dressing room, and front porch with cement steps were added to the property; in 1931, an interior and flooring renovation was completed; and in 1985 all the original windows were replaced with aluminum windows. The building is not an excellent example of a Spanish Colonial Revival-style building. The building retains subtle design features that mostly include simple arched entry ways and flat roof with a parapet. The parapet edge does not feature clay roof tiles along the edge. Clay roofs and tile edges are a common design feature included in Spanish Colonial Revival-style buildings. In fact, the building is devoid of character-defining features observed in modest to excellent examples of Spanish Colonial Revival-style buildings observed throughout Los Angeles and various Southern California communities. Character-defining features of the style commonly include wrought iron, wood, cast stone, terra cotta, polychromatic tile wrought iron grilles; wood detailing; cast stone, terra cotta, polychromatic tile; loggias or other courtyard spaces. Additionally, the original garage was split into three additional living spaces. The alterations to the original detached auto garage are a major alteration that takes away from the feeling of this residential development during the period of

significance, 1912–1948 identified in SurveyLA. There is also no information available to assert that Thomas Jewell was a master architect. Additionally, the first property owner Claude Richmond is listed as the contractor for the initial construction and subsequent alterations in 1928 and 1931. There is no information available to assert Richmond was a master builder. The property does not appear to be the work of a master architect and builder. The subject property is a rather modest example of a Spanish Colonial Revival-style building that is devoid of significant character-defining features. Therefore, the subject property does not appear to be eligible for designation as a City HCM pursuant to Criterion 3.

11.4 CITY OF LOS ANGELES HISTORIC PRESERVATION OVERLAY ZONE

The subject property is not within a HPOZ or a potential historic district. The surrounding buildings do not represent a significant and cohesive collection of architectural styles or range of construction dates, and do not appear eligible for designation as a potential historic district.

SECTION 12

CONCLUSION

The buildings are not found to be associated with events that have made a significant contribution to the broad patterns of our history. The buildings are not associated with the lives of person(s) significant in our past. The buildings are modest examples of the Spanish Colonial Revival style that is devoid of many significant and common design features that remain associated with the style. Therefore, the buildings do not embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, do not possess high artistic values, nor that represent a significant and distinguishable entity whose components may lack individual distinction. Therefore, the buildings located at 318 N. Oxford Avenue do not appear to be an eligible resource pursuant to the criteria for the National Register or California Register or for designation as a City HCM, would not contribute to a HPOZ, and would not be considered a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines.

The buildings on the subject property do not meet one or more eligibility criteria to merit consideration as a historical resource pursuant to CEQA (Section 15064.5(a) of the CEQA Guidelines). The presence of the artesian water was discovered through wildcatting, or the random exploratory drilling to find oil in the early 1900s and is not known to be a naturally occurring at-grade water source. Based on a review of historic topographic maps, naturally occurring sources of fresh water, which are typically associated with Native American habitation sites, are not known to be located at this site. Therefore, the archaeological sensitivity of the site is low due to the unknown presence of water and disturbance associated with the continued (re)development of the sites. Additionally, based on a review of the historic topographic maps, no known cemeteries are located within the project site or its immediate vicinity. Therefore, the project will not result in a substantial adverse change to a historical resource as defined in Section 15064.5(b) of the CEQA Guidelines.

SECTION 13 SOURCES

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ATTACHMENT A
RESUMES OF KEY PERSONNEL

Scott E. Torres, MA

Architectural Historian

Master of Arts, History,
California State University
Fullerton, Fullerton, CA,
2020

- History
- Architecture
- HABS Documentation
- California History
- Historic Preservation
- Cultural Survey

Years of Experience: 3+

- *Historic Resource Documentation and Evaluations for Sierra Madre Ca, Hollywood, San Marino, Ontario, Fontana, Glendale, and Los Angeles*
- *High Speed Rail Construction Package 4*
- *Society of Architectural Historians Member*

Mr. Scott Torres has more than three years of experience in the field of historic research and writing, including primary and secondary source analysis, conducting oral history interviews, peer review, and editing.

Mr. Torres has served as a project architectural historian and conducted historic assessments in the Cities of Los Angeles, including Hollywood, San Marino, Los Angeles, Orange, and surrounding communities within Los Angeles and San Bernardino Counties. Mr. Torres has conducted a historic resource evaluation of the Little Tokyo Towers as part of a historic resource assessment report in support of the Los Angeles Office of Historic Resources. Additional resource assessments in Hollywood include early Craftsman residences and the Period Revival Bungalow Court Apartments associated with early development and the entertainment industry. On behalf of the County of Los Angeles, Mr. Torres provided research and documentation on unincorporated East LA's Unique Theater, in support of its nomination for Historic Landmark designation. Mr. Torres has also provided historic documentation and literature review in support of the Los Angeles Music Center Electric Replacement Project; the project included an impact assessment regarding identified historic resources located within the music center campus. Additionally, Mr. Torres has conducted research in support of residential design reviews in the Cities of Glendale, Laguna Beach, San Marino, and Hollywood. Mr. Torres has also provided cultural resources support for the High-Speed Rail (HSR) Construction Package (CP) 4.

Mr. Torres has conducted Department of Parks and Recreation documentation and evaluations in support of site assessments in the Cities of Sierra Madre, Monrovia, Hollywood, Los Angeles, and Ontario. This work includes site photographs, database research, and map review.

In addition to extensive preparation of Historic Resource Assessment Reports (HRARs) and DPR 523A forms for scores of buildings throughout Los Angeles County, Mr. Torres' work includes a HABS documentation for agricultural buildings in Shafter, a Mills Act Application review for a residence in the City of Manhattan Beach, and design review consulting for a major renovation to the Villa Primavera in the City of West Hollywood.

Mr. Torres is a member of the Society of Architectural Historians.

Carrie E. Chasteen, MS

Cultural Resources Manager

Master of Science (Historic Preservation), School of the Art Institute of Chicago, Chicago, Illinois, 2001

Bachelor of Arts (History and Political Science), University of South Florida, Tampa, Florida, 1997

- Cultural resources management and legal compliance
- History of California
- Identification and evaluation of the built environment
- Archival documentation
- Historic preservation consultation

Years of Experience: 20 +

- Oregon Transportation Investment Act (OTIA) III CS3 Technical Lead
- Chair, Historic Preservation Commission, City of Pasadena
- Design Commission, City of Pasadena
- Phi Alpha Theta
- Extensive experience documenting and evaluating parks and recreational facilities
- Extensive experience in the City of Riverside

Ms. Carrie Chasteen has more than 20 years of experience in the field of cultural resources and the built environment, including project management, agency coordination, archival research, managing large surveys, preparation of compliance reports, preparation of Environmental Impact Statement / Environmental Impact Report (EIS/EIR) sections, peer review, and regulatory compliance. She meets and exceeds the Secretary of the Interior's *Professional Qualification Standards* in the fields of History and Architectural History.

Ms. Chasteen has served as Principal Investigator / Principal Architectural Historian on projects in Kern, San Bernardino, Riverside, Ventura, Los Angeles, Orange, Imperial, and San Diego Counties in Southern California. She has experience in California, Oregon, Washington, Arizona, Nevada, Missouri, Illinois, Florida, West Virginia, Connecticut, New York, New Jersey, and Massachusetts. She has extensive experience with the California Office of Historic Preservation, the California Department of Transportation (Caltrans), San Bernardino Associated Governments (SANBAG), Los Angeles County Department of Parks and Recreation, the City of Los Angeles, and various state, county, and local government agencies.

On behalf of the County of Los Angeles Department of Parks and Recreation (DPR), Ms. Chasteen managed the documentation and evaluation of 54 parks, golf courses, and arboreta. The historic evaluations assess County facilities that were identified as priorities due to the age of the facility, architect of record, or affiliation with event of importance to the history of development of Los Angeles County. The historic evaluations consider eligibility for listing on the National Register of Historic Places, the California Register of Historical Resources, the County Register of Landmarks and Historic Districts, and standards provided in CEQA. The results were used by the County DPR to address future projects in the facilities, alter plans as needed, and to inform a Cultural Resources Treatment Plan (CRTP) and Worker Environmental Awareness Program (WEAP) training. She also provided consultation services for the Arcadia County Park Pool and Bathhouse Replacement Project, which included documenting and evaluating the park as a historic district for eligibility for inclusion in the National Register of Historic Places and the California Register of Historical Resources. Because the park was found to be eligible for listing in both registers, Ms. Chasteen provided additional consultation services to ensure the replacement pools and bathhouse were in compliance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties* in order to minimize potential impacts to the historic district.

Additional experience includes preparing Historic American Building Survey/Historic American Engineering Record (HABS / HAER) documentation for the former Caltrans District 7 headquarters building, Roosevelt Annex at the California Veterans' Home in Yountville, and the Space Flight Operations Facility, commonly referred to as Mission Control, a National Historic Monument, at the Jet Propulsion Laboratory (JPL) in Pasadena.