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## **VIA EMAIL AND ELECTRONIC UPLOAD**

Planning and Land Use Committee  
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**Re: Supplemental Appeal Documentation - 5300 Oakdale Avenue; VTT-83927-HCA-1A, and related cases VTT-83927-HCA, ZA-2023-2170-ZAD-ZV-ZAA, ZA-2023-2170-ZAD-ZV-ZAA-1A, ENV-2020-6762-EIR (Program EIR); Council File No. 25-0310**

Dear Members of the Planning and Land Use Committee:

This firm represents West Valley Alliance for Optimal Living which opposes approval of the proposed Project located at 5300 Oakdale Avenue in the City of Los Angeles ("Project").<sup>1</sup>

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<sup>1</sup> Application filed 3/23/2023 available at:  
<https://planning.lacity.gov/pdiscaseinfo/document/NTg2OA0/382be727-91db-4e5c-88e0-bb0f216d41aa/esubmit>

Application filed 8/1/2024 available at:  
<https://planning.lacity.gov/pdiscaseinfo/document/MTE2NjM0/32d019b8-1d0c-4d58-9258-fba315e88f6f/esubmit>

Environmental Assessment Form posted 4/14/2023 available at:  
<https://planning.lacity.gov/pdiscaseinfo/document/NTg3MQ0/382be727-91db-4e5c-88e0-bb0f216d41aa/esubmit>

Zoning Administrator Determination Findings Oakdale Estates posted 4/14/2023 available at:  
<https://planning.lacity.gov/pdiscaseinfo/document/NTg3NA0/382be727-91db-4e5c-88e0-bb0f216d41aa/esubmit>

My client filed a timely appeal of the Project approval. However, on March 7, 2025, the City Planning Commission issued a Letter of Determination (“LOD”) denying the appeal of the project because:

The Los Angeles City Planning Commission (CPC) and the Applicant failed to mutually agree on an extension of time for the first-level appellate body to act beyond the specified 45 days, mandated by Governmental Code Sec. 66452.5(c)(1), of the California Subdivision Map Act. Pursuant to Government Code Sec. 66452.5(c)(1) and Los Angeles Municipal Code Section 13A.2.8.F.2, if there is a failure for the appeal board to render a timely decision on the appeal, then the decision shall result in a denial of the appeal.

The City thus, to date, has failed to provide my client a hearing on the appeal and has failed to consider the merits of our objections to the Project. We would hope for better treatment from the Planning and Land Use Committee and City Council given the very real issues raised by this appeal. As detailed herein, the City has failed to comply with the California Environmental Quality Act (“CEQA”) and is improperly relying on the Program Environmental Impact Report (“Program EIR”) for the City’s Housing Element<sup>2</sup> as the CEQA document for this

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Vesting Tentative Tract Map Findings posted 4/14/2023 available at:

<https://planning.lacity.gov/pdiscaseinfo/document/NTg1OQ0/382be727-91db-4e5c-88e0-bb0f216d41aa/esubmit>

Vicinity map posted 4/14/2023 available at:

<https://planning.lacity.gov/pdiscaseinfo/document/NTg3Mw0/382be727-91db-4e5c-88e0-bb0f216d41aa/esubmit>

Landscape Plan posted 4/14/2023 available at:

<https://planning.lacity.gov/pdiscaseinfo/document/NTg2Ng0/382be727-91db-4e5c-88e0-bb0f216d41aa/esubmit>

Renderings posted 4/14/2023 available at:

<https://planning.lacity.gov/pdiscaseinfo/document/NTg2NA0/382be727-91db-4e5c-88e0-bb0f216d41aa/esubmit>

Tentative Tract Map posted 4/14/2023 available at:

<https://planning.lacity.gov/pdiscaseinfo/document/NTg2NQ0/382be727-91db-4e5c-88e0-bb0f216d41aa/esubmit>

<sup>2</sup> The Draft EIR for the Housing Element is available at:

[https://planning.lacity.gov/development-services/eir/Housing-Element\\_2021-2029\\_Update\\_Safety-Element\\_Update\\_deir](https://planning.lacity.gov/development-services/eir/Housing-Element_2021-2029_Update_Safety-Element_Update_deir)

Project Description Chapter available at: [https://planning.lacity.gov/eir/HEU\\_2021-2029\\_SEU/deir/files/3\\_Project%20Description.pdf](https://planning.lacity.gov/eir/HEU_2021-2029_SEU/deir/files/3_Project%20Description.pdf)

The Final EIR for the Housing Element is available at: <https://planning.lacity.gov/development-services/eir/housing-element-2021-2029-update-safety-element-update-0>

project. The proposed project would damage an historic resource and will result in agricultural resource impacts not addressed in the Program EIR, as detailed in my client's January 5, 2025 and March 17, 2025 Appeal Justifications. In addition, the proposed Project is not consistent with the requirements of California Code of Regulations, Title 14 - Natural Resources, Division 1.5 - Department Of Forestry And Fire Protection, Chapter 7 - Fire Protection, Subchapter 2 - State Minimum Fire Safe Regulations, Article 2 - Ingress And Egress, Section 1273.08 - Dead-End Roads for development located in Very High Fire Hazard Severity Zones ("VHFHSZ"). This will result in significant fire hazard impacts. The City must therefore prepare a project-specific EIR for the proposed Project. The City also erred in adopting the required findings for the Vesting Tentative Tract ("VTT").

## **I. THE PROPOSED PROJECT**

As noted in the hearing notice for the Project:<sup>3</sup>

The proposed project involves the removal of existing structures and a portion of an existing orchard and the construction of 21, two-story, single-family homes. The proposed homes will range from 4,819 square feet to 5,136 square feet in floor area. Nineteen homes will contain an Accessory Dwelling Unit (ADU) ranging from 367 square feet to 503 square feet. The project also includes the preservation of two westernmost lots, to be donated in fee to a public agency and the construction of 1,178 square foot caretaker's residence. The project also involves the merger of the four (4) existing parcels, Assessor Parcel Numbers 2164-008-001, 2164-007-005, 2164-008-006, and 2164-008-007 and re-subdivision into 23 ground lots. The project also includes eight-foot fencing along the northern, southern and western edges as well as a 15-foot hedgerow along the northern property line. The project will preserve 308 trees and will plant 328 new trees, inclusive of 50 new native trees to be planted within the preservation lots.

The project description provided thus fails to address the destruction of the existing Bothwell farm and the farm's orange grove and thus fails to provide the public with an accurate description of the proposed Project. (See description of existing structures in **Section IV.A** of this letter).

The proposed Project requires the following discretionary approvals:

- Pursuant to Los Angeles Municipal Code (LAMC) Section 17.15, a Vesting Tentative Tract Map for the merger and re-subdivision of four (4) parcels into 23

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The Mitigation Monitoring Program for the Housing Element is available at:  
<https://planning.lacity.gov/development-services/eir/housing-element-2021-2029-update-safety-element-update-0>

<sup>3</sup> <https://planning.lacity.gov/dcpapi/meetings/document/77276>

ground lots for the construction of 21, two-story single-family residences, one (1) caretaker's residence, 20 percent reduction in front yard and side yard setback requirements and three (3) model home lots.

- Pursuant to LAMC 12.24.X.7, a Zoning Administrator's Determination to permit an eight-foot-tall fence along the northern, southern and western edges of the project site.
- Pursuant to LAMC Section 12.28.A, a Zoning Administrator's Adjustment to permit a 20 percent side yard reduction for Lots 1-21.
- Pursuant to LAMC Section 12.27 a Zone Variance, to permit a 15-foot hedgerow along the northern edge of Lots 1-10.

The proposed Project is located at 5300 Oakdale Avenue within the Encino-Tarzana Community Plan area.<sup>4</sup> The Encino-Tarzana Community Plan is in the process of being updated; the last update to the Plan was approved in December of 1998.<sup>5</sup> Although the Project site is zoned RA-1, it operated as a family farm<sup>6</sup> beginning in 1929. The Project site is subject to ZI-2462 Modifications to SF Zones and SF Zone Hillside Area Regulations,<sup>7</sup> and ZI-2438 Equine Keeping in the City of Los Angeles.<sup>8</sup> The subject property is identified as Prime Farmland in the City's Zimas system, and is in an Urban Agriculture Incentive Zone,<sup>9</sup> a Very High Fire Hazard Severity Zone, and the Santa Monica Mountains Zone.

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<sup>4</sup> The current plan is available at:  
[https://planning.lacity.gov/odocument/7d419ea7-e1b9-400d-8f7e-ea7f39822527/Encino-Tarzana\\_Community\\_Plan.pdf](https://planning.lacity.gov/odocument/7d419ea7-e1b9-400d-8f7e-ea7f39822527/Encino-Tarzana_Community_Plan.pdf)

<sup>5</sup> <https://planning.lacity.gov/plans-policies/community-plan-area/encino-tarzana>

<sup>6</sup> <https://www.dailynews.com/2023/11/27/san-fernandos-valleys-last-commercial-orange-grove-is-set-to-lose-1100-trees/>

<https://www.foxla.com/news/last-stand-for-san-fernando-valleys-orange-grove-1100-trees-to-make-way-for-high-end-homes>

<sup>7</sup> <https://zimas.lacity.org/documents/zoneinfo/ZI2462.pdf>

<sup>8</sup> See <https://zimas.lacity.org/documents/zoneinfo/ZI2438.pdf> It does not appear that the Project has been fully reviewed for consistency with these requirements.

<sup>9</sup> <https://planning.lacity.gov/odocument/8ad42004-12d8-4338-95d4-d6d41434cc13/FAQ.pdf>



**II. THE CITY MAY NOT RELY ON THE PROGRAM EIR FOR THE CITY'S HOUSING ELEMENT AS THE ENVIRONMENTAL CLEARANCE FOR THIS PROJECT**

According to the hearing notice:

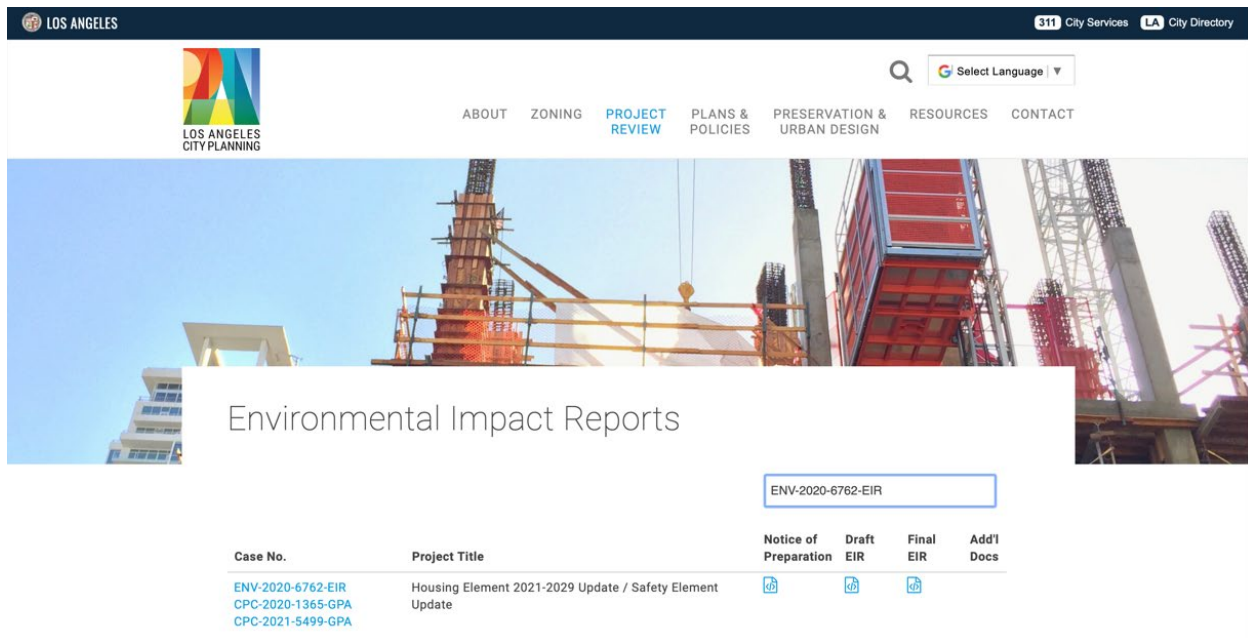
The Deputy Advisory Agency shall consider the following:

1. Based upon the whole of the administrative record on the Proposed Housing Project, and a review and consideration of the Program EIR, the decision maker finds all the following statements to be true: 1. This Proposed Housing Project is within the scope of the previously approved program for which the Program EIR was certified. 2. This Proposed Housing Project will have no significant environmental effects not examined in the Program EIR. 3. The Program EIR adequately described the Proposed Housing Project for the purposes of California Environmental Quality Act (CEQA). 4. Pursuant to CEQA Guidelines Section 15162, no substantial changes to the project analyzed in the Program EIR are proposed as part of this Proposed Housing Project. Further, no substantial changes have occurred with respect to the circumstances under which the Program EIR was certified, and no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time that the Program EIR was certified as complete, has become available. 5. All applicable mitigation measures, identified in the Program EIR Mitigation Monitoring Program (MMP), necessary to reduce significant impacts to less than significant, or equivalent or more effective substituted mitigation measures, have been incorporated into the Proposed Housing Project or will be made into enforceable obligations on the Proposed Housing Project. A mitigation and monitoring program has been prepared for adoption.

The hearing notice and the accompanying staff report thus failed to disclose that the Program EIR that the City is relying on for CEQA clearance is the EIR for the City's Housing Element, which was certified in November of 2021 with an Addendum adopted in June of 2022.<sup>10</sup> Only a search for the referenced "ENV-2020-6762-EIR (Program EIR)" revealed this fact, as shown in the screenshot of the search results, shown in **Figure 1**:

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<sup>10</sup> The Addendum is available at: [https://files.ceqanet.opr.ca.gov/267064-6/attachment/212OSYhMgtwiEN358dRzaYubnd2z51YG0AnmyTZLcE3RCIuCX0aed\\_nxUmnH z56nYHrFcKs6cfQHh3l\\_0](https://files.ceqanet.opr.ca.gov/267064-6/attachment/212OSYhMgtwiEN358dRzaYubnd2z51YG0AnmyTZLcE3RCIuCX0aed_nxUmnH z56nYHrFcKs6cfQHh3l_0)



**FIGURE 1: Screenshot of Search Results for the Referenced “Program EIR”**

Why did the City fail to provide the public with the title of the Program EIR being used? Probably because it is obvious that the Housing Element Program EIR is inadequate for tiering purposes for this type of site-specific project and the City wanted the public to assume that they were relying on a more applicable Program EIR.

The hearing notice and the accompanying staff report<sup>11</sup> also fail to provide substantial evidence or even a fair argument that reliance on the Housing Element Program EIR (“Program EIR”) is appropriate. In general Program EIRs for housing elements do not adequately address site-specific housing projects because they often lack the necessary detail to evaluate and mitigate the specific impacts of individual housing projects. In fact, as noted on page 4-3 of the Program EIR, this “EIR addresses citywide housing development with a variety of projects spread over a period of eight years.” An examination of the Project Description<sup>12</sup> in the Program EIR and the Program EIR as a whole, shows that it fails to identify the specific housing sites or to consider site-specific impacts. Rather it addresses impacts on a City-wide basis and applies “to the entire geographic area located within the boundaries of the City of Los Angeles (City), which encompasses 467 square miles.”<sup>13</sup>

Regardless whether a proposed subsequent activity is determined to be a new, related project, or an expansion/modification of an existing project, when a program EIR is used to

<sup>11</sup> The Staff Report available at: [https://planning.lacity.gov/plndoc/Staff\\_Reports/2024/08-15-2024/VTT\\_83927.pdf](https://planning.lacity.gov/plndoc/Staff_Reports/2024/08-15-2024/VTT_83927.pdf)

<sup>12</sup> Project Description Chapter available at: [https://planning.lacity.gov/eir/HEU\\_2021-2029\\_SEU/deir/files/3\\_Project%20Description.pdf](https://planning.lacity.gov/eir/HEU_2021-2029_SEU/deir/files/3_Project%20Description.pdf)

<sup>13</sup> Housing Element DEIR page 3-1.

avoid preparing subsequent EIRs, the City must examine site-specific program activities in light of the program EIR to determine whether an additional environmental document must be prepared.<sup>14</sup> First, the City must determine if a subsequent activity under a program may have (site-specific) environmental impacts that were not fully evaluated in the Program EIR. If the subsequent activity would have effects not examined in the Program EIR, then a new initial study must be prepared, leading to either an EIR or a negative declaration.<sup>15</sup> If the City finds that a subsequent (site-specific) activity will not create any new effects or require mitigation measures that were not discussed in the Program EIR, the agency can approve the activity as being "within the scope" of the project covered by the Program EIR, and no new environmental document will be required.<sup>16</sup>

For a Program EIR to serve as a site-specific EIR for a subsequent activity, the impacts of the activity must have been examined at a sufficient level of detail in the Program EIR to evaluate and mitigate the potential site-specific impacts of the future activity.<sup>17</sup> This means that a Program EIR must be "sufficiently comprehensive and specific" to cover the detailed impacts of later projects, which is often not the case for broad housing elements and is definitely not the case for the City's Program EIR which fails to address the site-specific impacts of the proposed Project.

Later activities must be examined in light of the Program EIR to determine whether an additional environmental document must be prepared. If the Program EIR does not contemplate the specific details of a subsequent project, further CEQA review is required.<sup>18</sup>

Where "a later proposal is not 'either the same as or within the scope of the project ... described in the program EIR,' then review of the proposal is not governed by section 21166's deferential substantial evidence standard. [Citations.] Instead, under ... section 21094, the agency is required to apply a more exacting standard to determine whether the later project might cause significant environmental effects that were not fully examined in the initial program EIR." (*San Mateo Gardens, supra* , 1 Cal.5th at p. 960, 207 Cal.Rptr.3d 314, 378 P.3d 687 citing *Sierra Club, supra* , 6 Cal.App.4th at p. 1321, 8 Cal.Rptr.2d 473 ; CEQA Guidelines, § 15168, subd. (c)(5).)<sup>19</sup>

A Program EIR for a housing element, such as the City's Program EIR, which addresses broader planning issues, does not provide the detailed analysis needed for site-specific projects.

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<sup>14</sup> CEQA Guidelines § 15168(c).

<sup>15</sup> CEQA Guidelines § 15168(c)(1).

<sup>16</sup> CEQA Guidelines § 15168(c)(2).

<sup>17</sup> CEQA Guidelines § 15152(f); see also CEQA Guidelines § 15168(c)(5).

<sup>18</sup> CEQA Guidelines § 15168. Program EIR.

<sup>19</sup> *Save Our Access v. City of San Diego*, (2023) 92 Cal.App.5th 819, 859.

Since the Program EIR did not evaluate any later activities (including the proposed Project) in sufficient detail, additional environmental review is required. While a Program EIR can streamline the environmental review process, in this case the referenced Program EIR does not provide the detailed analysis required for this site-specific housing project. This necessitates additional environmental review to ensure that the specific impacts of the Project are adequately evaluated and mitigated.

### **III. THE PROJECT IS NOT WITHIN THE SCOPE OF THE HOUSING ELEMENT EIR**

The CEQA Guidelines state that where subsequent activities under a program involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the Program EIR.<sup>20</sup> After we raised this issue with the Zoning Administrator, the City prepared the totally inadequate checklist included as **Attachment A** to this letter.

The Checklist used by the City fails both to demonstrate that the Project is within the scope of the Program EIR or that the Project will not result in site-specific effects or require mitigation measures that were not discussed in the Program EIR. In addition, the checklist inappropriately:

- Limits the application of Program EIR mitigation measures to the Project (see Checklist in **Attachment A** to this letter, pages 9 to 12)
- Fails to provide justification for non-application of mitigation measures to the Project (Checklist Attachments B and C are not attached to the Checklist).
- Provides for the applicant to substitute mitigation measures for those in the Program EIR (see Checklist in **Attachment A** to this letter, pages 12)
- Fails to provide a list of the substituted mitigation measures (Checklist Attachments B and C are not attached to the Checklist; a partial list of substituted mitigation measures is on Checklist page 17; TCR-4 is missing)
- Fails to adequately justify the substitution of mitigation measures (Checklist Attachments B and C are not attached to the Checklist)
- Fails to provide the needed further analysis of mitigation measures identified on Checklist page 13.
- Checklist Attachments D is not attached to the Checklist.
- Fails to provide the additional needed environmental analysis identified on Checklist page 14.
- The City inconsistently, and without substantial evidence, concludes on Checklist page 15 that the Project will not have effects not examined in the Program EIR.

The Checklist is sloppily prepared, appears to be a post-hoc justification for failing to conduct CEQA review of the proposed Project and is not supported by substantial evidence. The

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<sup>20</sup> CEQA Guidelines § 15168(c)(4).

Checklist fails to demonstrate that the Project is within the scope of the Program EIR and in fact provides evidence to the contrary. As noted in CEQA Guidelines Section 15168(c)(2):

Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

The City's totally inadequate checklist finds the Project to be within the scope of the Housing Element EIR simply because it is a single-family residential development on a site zoned for residential uses. The site is zone RA-1 (Very Low Density Residential), but has historically been used for agriculture. The checklist for the Project was clearly prepared in haste, and fails to identify that the Project includes ADUs and is an area with special environmental considerations including being within a Very High Fire Hazard Severity Zone. Oddly being in a Very High Fire Hazard Severity Zone, in combination with residential zoning, together is a qualification for being within the scope of the EIR according to the checklist.

As shown on the City's checklist, and confirmed by our staff, the Project site is not included in the Housing Element Inventory of Adequate Sites, including Appendices 4.1, 4.2, 4.3, and 4.8 of the 2021-2029 Housing Element and is not a site identified to be rezoned to allow residential uses or to allow multi-family residential uses at a greater density in the Candidate of Sites for Rezoning, Appendix 4.7 of the 2021-2029 Housing Element.<sup>21</sup> As noted on page 151 of the Housing Element: "(t)he Adequate Sites Inventory presents an inventory of land suitable and available for residential development to meet the City's RHNA Allocation at all income levels." A copy of the Housing Element's Inventory of Adequate Sites for Housing (Housing Element Appendix 4.1), which demonstrates that the Project site was not included in the Housing Element, is included as **Attachment B**.<sup>22</sup>

Given that the Project site is not identified as a potential housing site in Housing Element's Adequate Sites inventory, the Project site was not anticipated for housing development in the Housing Element. It is thus clear that the proposed Project was not analyzed in the EIR for the Housing Element, since it was not included in the Housing Element. Substantial evidence thus indicates that the Project was not anticipated or addressed in the Housing Element EIR. The proposed Project is thus not within the scope of the Program EIR for the Housing Element and reliance on the Housing Element EIR as the environmental clearance for the Project is inappropriate.

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<sup>21</sup> The 2021-2029 Los Angeles City Housing Element, including the cited appendices, are available at: <https://planning.lacity.gov/plans-policies/housing-element>

<sup>22</sup> The only sites on Oakdale Avenue in this inventory are 5525 Oakdale Avenue (spreadsheet line 13738) and 10123 N. Oakdale Avenue (spreadsheet line 19629). The Project site is not included in the inventory.



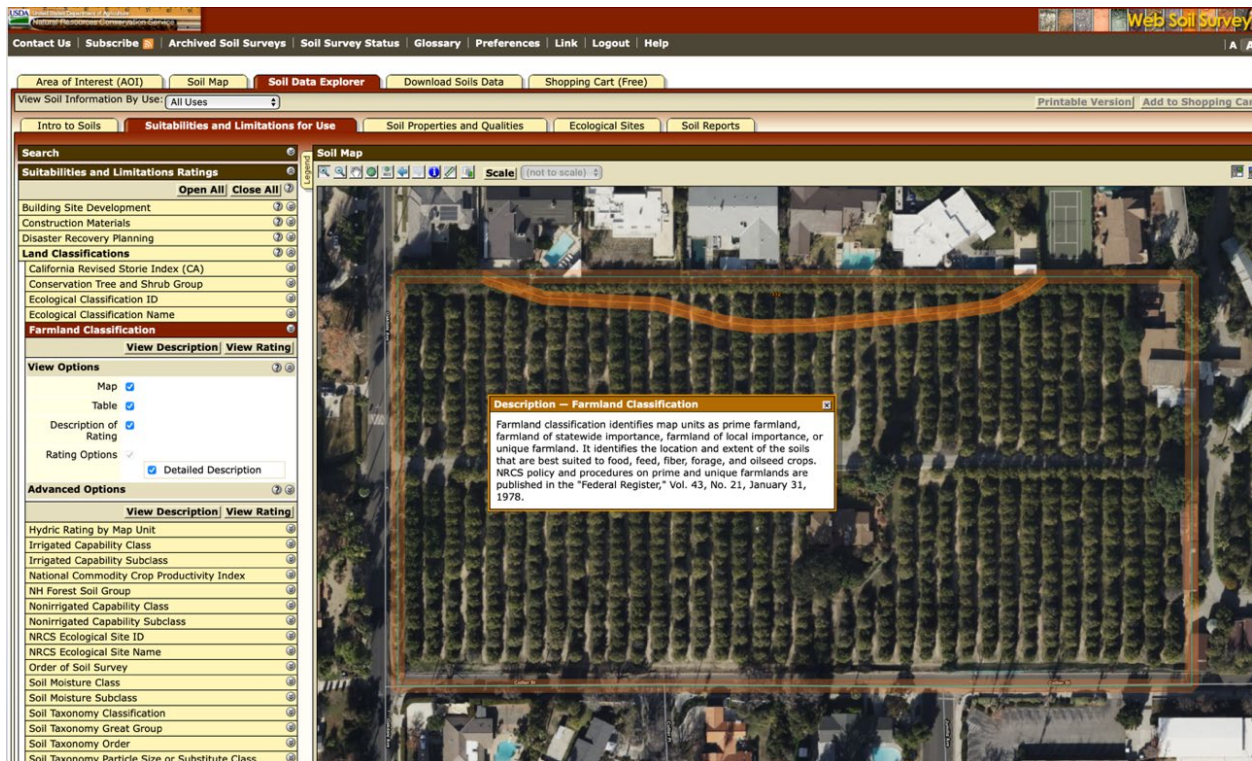
#### IV. THE PROJECT WILL HAVE SIGNIFICANT IMPACTS NECESSITATING PREPARATION OF AN EIR

The need for additional environmental review for the proposed Project is highlighted by the fact that the Project, at a minimum, will have significant agricultural resource, hazards, and historic resource impacts.

##### A. Agricultural Impacts

As we have previously detailed, both the City's and the State CEQA Guidelines environmental impact checklists address impacts to agricultural resources. CEQA Guidelines Appendix G: Environmental Checklist Form, item IIa asks whether a project will: "Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?"

Not only does the City's ZIMAS website identify the Project site as Prime Farmland, but as shown in **Figure 2**, the United States Department of Agricultural ("USDA") also identifies the Project site as "prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland."



**FIGURE 2: USDA Designation of Farmland Status of Project Site**

Source: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

The EIR for the Housing Element did not address agricultural impacts. As noted on page 1-8 of the Draft EIR for the Housing Element, given the City-wide nature of the EIR, the Initial Study for the Housing Element mistakenly concluded “Agricultural and Forestry Resources: All the potential impacts associated with agricultural resources and forest land resources would be less than significant under the Housing Element Update and Safety Element Update.”

The proposed Project would result in the conversion of the San Fernando Valley’s last commercial orange grove to residential use and the loss of 1,137 orange trees.<sup>23</sup> The proposed Project would result in the loss 14 acres of cultivated farmland and would convert 612,868 square feet of Prime Farmland to non-agricultural uses. This is a significant impact under CEQA. An EIR for the Project is thus required to address both Project and cumulative impacts to farmland.

**B. Hazards Impacts – Failure to Comply with State Minimum Fire Safety Regulations and Los Angeles Fire Department Requirements**

In 2018, Senate Bill 901<sup>24</sup> mandated the expansion of the scope of California’s regulations regarding minimum fire safety standards to include those lands classified and designated as Very High Fire Hazard Severity Zones (“VHFHSZ”), as defined in subdivision (i) of Government Code § 51177,<sup>25</sup> to include Local Responsibility Areas. These regulations were

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<sup>23</sup> <https://www.dailynews.com/2023/11/27/san-fernandos-valleys-last-commercial-orange-grove-is-set-to-lose-1100-trees/>

<sup>24</sup> Per the Legislative Counsel’s Digest, paragraph 6, SB 901 included the following: “This bill would also require the state forestry board to adopt regulations implementing minimum fire safety standards that are applicable to lands classified and designated as **very high fire hazard severity zones** and would require the regulations to **apply to the perimeters and access to all residential**, commercial, and industrial building construction **within lands classified and designated as very high fire hazard severity zones**, as defined, after July 1, 2021. The bill would further require the state forestry board to, on and after July 1, 2021, periodically update regulations for fuel breaks and greenbelts near communities to provide greater fire safety for the perimeters to all residential, commercial, and industrial building construction within state responsibility areas **and lands classified and designated as very high fire hazard severity zones** after that date. The bill would require the state forestry board, on or before July 1, 2022, to develop criteria and maintain a “Fire Risk Reduction Community” list of local agencies located in a state responsibility area **or** a very high fire hazard severity zone that meet best practices for local fire planning.” (Emphasis added.)

<sup>25</sup> Government Code section 51177 (i) now defines VHFHSZ as: “Very high fire hazard severity zone” means an area designated as a very high fire hazard severity zone by the State Fire Marshal pursuant to Section 51178 that is **not** a state responsibility area. (As amended in 2021, effective 1/1/2022.; Emphasis added.)



extended to those portions of incorporated cities such as the City of Los Angeles that were designated as VHFHSZ. Thereafter, the Board of Forestry adopted implementing regulations. The California Board of Forestry and Fire Protection adopted the Minimum Fire Safe Regulations in 2021. The regulations went into effect on April 1, 2023.<sup>26</sup> The purpose of the Regulations is to establish *minimum* fire safety standards for residential, commercial, and industrial development, provide basic emergency access and perimeter wildfire protection, protect undeveloped ridgelines, and reduce fire risk. 14 CCR § 1273.02.<sup>27</sup> These regulations were adopted after extensive consultation with fire professionals and community members.

The proposed Project is within a VHFHSZ according to ZIMAS.

▼ Additional	
Airport Hazard	None
Coastal Zone	None
Farmland	Prime Farmland
Farmland	Urban and Built-up Land
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	Yes
Fire District No. 1	No
Flood Zone	Outside Flood Zone
Watercourse	No
Methane Hazard Site	None
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	Yes
Wells	None
Sea Level Rise Area	No
Oil Well Adjacency	No

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<sup>26</sup> The Regulations are available at:  
<https://www.law.cornell.edu/regulations/california/title-14/division-1.5/chapter-7/subchapter-2>.  
They are also attached hereto as **Attachment E**.

<sup>27</sup> Cal. Code Regs. Tit. 14, § 1270.02, entitled “Purpose” states as follows:

- (a) Subchapter 2 has been prepared and adopted for the purpose of establishing state minimum Wildfire protection standards in conjunction with Building, construction, and Development in the State Responsibility Area (SRA) and, after July 1, 2021, the Very High Fire Hazard Severity Zones, as defined in Government Code § 51177(i) (VHFHSZ).
- (b) The future design and construction of Structures, subdivisions and Developments in the SRA and, after July 1, 2021, the VHFHSZ shall provide for basic emergency access and perimeter Wildfire protection measures as specified in the following articles.
- (c) These standards shall provide for emergency access; signing and Building numbering; private water supply reserves for emergency fire use; vegetation modification, Fuel Breaks, Greenbelts, and measures to preserve Undeveloped Ridgelines. Subchapter 2 specifies the minimums for such measures.

The Project is thus subject to the Regulations, which apply to “(1) the perimeters and access to *all* residential, commercial, and industrial Building construction within the SRA approved after January 1, 1991, and **those approved after July 1, 2021 within the VHFHSZ**, except as set forth below in subsection (b).”<sup>28</sup> The proposed Project is thus subject to the Regulations.

Article 2 of the State Minimum Fire Safe Regulations, Section 1273 pertains to the standards for "Ingress and Egress" roads and driveways. The intent of these standards is clearly stated: “Roads, and Driveways, whether public or private, unless exempted under 14 CCR §1270.03(d) **shall provide for safe access for emergency wildfire equipment and civilian evacuation concurrently**, and shall provide unobstructed traffic circulations during a wildfire emergency consistent with 14 CCR §§1273 through 1273.09.”

The proposed Project fails to comply with California Code Of Regulations Title 14 - Natural Resources Division 1.5 - Department Of Forestry And Fire Protection Chapter 7 - Fire Protection Subchapter 2 - State Minimum Fire Safe Regulations Article 2 - Ingress And Egress Section 1273.08 - Dead-End Roads. 14 CCR § 1273.08 specifies:

(a) The maximum length of a Dead-end Road, including all Dead-end Roads accessed from that Dead-end Road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:

parcels zoned for less than one acre - 800 feet

parcels zoned for 1 acre to 4.99 acres - 1,320 feet

parcels zoned for 5 acres to 19.99 acres - 2,640 feet

parcels zoned for 20 acres or larger - 5,280 feet

All lengths shall be measured from the edge of the Road surface at the intersection that begins the Road to the end of the Road surface at its farthest point. Where a dead-end road crosses areas of differing zoned parcel sizes requiring different length limits, the shortest allowable length shall apply.

(b) See 14 CCR § 1273.05 for dead-end road turnaround requirements.

The Project site is zoned RA-1. The proposed Project includes the merger of the four (4) existing parcels, Assessor Parcel Numbers 2164-008-001, 2164-007-005, 2164-008-006, and 2164-008-007 and re-subdivision into 23 ground lots on the Project site which has 612,868 square feet of gross area and would have 579,049 square feet of net area after the required public

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<sup>28</sup> Section 1270.03(a)(1) of the Regulations.

street dedication (see **Attachment C** – site plans dated 1/9/2024). This equates to an average of 25,176 square feet per lot.<sup>29</sup>

The Project does not comply with the regulations since it would be served by a private Dead-end Road that is greater than 800 feet in length, measured from the edge of the Road surface at the intersection that begins the Road to the end of the Road surface at its farthest point. The length of the proposed roadway can be calculated by adding the widths of the southern lots served by the proposed Dead-end Road (see **Attachment C**).

LENGTH OF DEAD-END ROAD	
LOT	WIDTH (Feet)
11	84
12	84
13	94
14	84
15	84
16	90
17	84
18	84
19	84
20	95
TOTAL:	867

The proposed Project would thus fail to comply with the letter and spirit of the Regulations resulting in a significant hazards impact. An EIR is required for the proposed Project.

In addition, the proposed Project fails to comply with Los Angeles Fire Department (LAFD) conditions of approval. As required by LAFD under Condition 77:

3) Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. **No dead ending street or fire lane shall be greater than 700 feet in length** or secondary access shall be required.

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<sup>29</sup> Municipal Code Section 12.07.C.4 specifies a minimum lot area of 17,500 square feet and 12.07.C.5 specifies all buildings and accessory buildings shall not exceed 25 percent of the lot area when the lot is less than 20,000 square feet. For lots 20,000 square feet or greater, the maximum Residential Floor Area shall not exceed 20 percent of the lot area, or 5,000 square feet, whichever is greater. 5,000 square feet represents 20 percent of a 25,000 square foot lot. An acre is 43,560 square feet.

The Dead-end street is longer than 700 feet and secondary access is not provided to a number of the lots.<sup>30</sup> Unfortunately, the Fire Department has a habit of not enforcing or monitoring compliance with either the State Fire Safety Regulations or its own Conditions of Approval and these requirements are similarly not enforced by Planning or Building and Safety. Failure of the Project and Project design to comply with the City's fire safety would be a significant impact requiring preparation of an EIR.

**C. Historic Resource Impacts**

CEQA Guidelines §15064.4 states in part:

**15064.5. DETERMINING THE SIGNIFICANCE OF IMPACTS TO  
ARCHAEOLOGICAL AND HISTORICAL RESOURCES**

- (a) For purposes of this section, the term “historical resources” shall include the following:
  - (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).
  - (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
  - (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:

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<sup>30</sup> See attachment to the March 7, 2025 City Planning Commission Letter of Determination for 5300 North Oakdale Avenue.

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

As noted on page 2 of the Staff Report for August 21, 2024 hearing on this item:

The Bothwell Ranch located on the project site has been determined to be eligible for listing in the National Register of Historic Places, California Register of Historic Resources, local register, and was found to be a potential historic resource based on the City's HistoricPlacesLA website or SurveyLA, the citywide survey of Los Angeles. However, on June 28, 2022, the Los Angeles City Council acted on the consideration of inclusion of the Bothwell Ranch in the list of Historic-Cultural Monuments and found that the subject property does not conform with definition of a monument pursuant to LAMC Section 22.171.7 of the Los Angeles Administrative Code.

Council's decision was based on a letter from Councilman Blumenfield<sup>31</sup> stating that:

Aerial photographic evidence in the record shows that the Bothwell Citrus Grove was fully demolished and replanted sometime between 1980 and 1985. Due to the fact that the existing citrus grove was not planted prior to 1945, which is the year that the period of significance ended for citrus groves, the site does not meet the criteria to be designated a historic cultural monument nor included in the list of Historic-Cultural Monuments.

However, as noted in the Staff Report to the Cultural Heritage Commission that recommended approval of monument status,<sup>32</sup> the identified period of significance is 1926 until

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<sup>31</sup> See PLUM Report available at: [https://clkrep.lacity.org/online/docs/2019/19-0782\\_rpt\\_PLUM\\_1\\_06-21-22.pdf](https://clkrep.lacity.org/online/docs/2019/19-0782_rpt_PLUM_1_06-21-22.pdf)

Councilman Blumenfield's letter is available at:  
[https://clkrep.lacity.org/online/docs/2019/19-0782\\_misc\\_06-21-22.pdf](https://clkrep.lacity.org/online/docs/2019/19-0782_misc_06-21-22.pdf)

<sup>32</sup> Staff Report to Cultural Heritage Commission dated November 7, 2019 available at:  
[https://clkrep.lacity.org/online/docs/2019/19-0782\\_misc\\_11-21-2019.0001.pdf](https://clkrep.lacity.org/online/docs/2019/19-0782_misc_11-21-2019.0001.pdf)

2016, and the property was deemed significant as exemplifying a significant broad cultural, economic or social history of the area, not for the individual trees:

Bothwell Ranch meets one criteria under the Cultural Heritage Ordinance: it “exemplifies significant contributions to the broad, cultural, economic, or social history of the nation, state, city or community” as one of the last remaining commercial citrus groves in the San Fernando Valley, representing a significant remnant of the region’s agricultural roots and a once-integral element of the local economy. Agriculture, particularly citrus growing, historically dominated the Valley and other parts of Los Angeles, and played a key role in Southern California’s development and promotion.

...

The period of significance is 1926 until 2016, to reflect when the property was in operation as a commercial citrus orchard.

Bothwell Ranch was identified through the citywide historic resources survey, SurveyLA, as eligible for listing under the local, state, and national designation programs as one of the last remaining family-owned commercial citrus groves in the San Fernando Valley.

Bothwell Ranch on the Project site was thus found by the Cultural Heritage Commission to be significant based on the same criterion as California Register Criterion 1: “Association with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).”<sup>33</sup> This is also the same as National Register Criterion A: “Is associated with events that have made a significant contribution to the broad patterns of our history (Criterion A).”<sup>34</sup>

A National Register Nomination has been prepared for Bothwell Ranch and has been submitted to the State Office of Historic Preservation for consideration. As part of researching the property, the historic resource consultant addressed the issue of the replacement of orange trees in the grove and received guidance from the resource agency that this would not impact the historic nature of a property. As described in the National Register Nomination included as **Attachment D** to this letter:

Bothwell Ranch is located in the Tarzana1 neighborhood of Los Angeles in the southwest San Fernando Valley. It comprises four parcels totaling 13.8 acres within the surrounding residential community and is less than a mile south of Ventura Boulevard and the 101 Freeway. Altogether, Bothwell Ranch consists of one contributing site (Citrus Grove), five contributing buildings (Main House, Multi-Purpose Building, two Two-

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<sup>33</sup> California Register Criteria are available at: [https://ohp.parks.ca.gov/?page\\_id=21238](https://ohp.parks.ca.gov/?page_id=21238)

<sup>34</sup> National Register Criteria are available at: [https://ohp.parks.ca.gov/?page\\_id=21237](https://ohp.parks.ca.gov/?page_id=21237)

Story Garages, and Train Station), and six contributing structures (Train Shed and five Storage Sheds). The Citrus Grove primarily encompasses much of the western portion of Bothwell Ranch, with most of the buildings and structures situated to the east. Character-defining features of the property include the primary entrance from Oakdale Avenue along a central east-west gravel driveway; layout of regularly spaced rows of citrus trees planted in a north-south orientation; Minimal Traditional-style Main House situated within the Citrus Grove just south of the east-west driveway; and wood and metal cladding, original wood windows, and hip, gable, and shed roof forms on all contributing buildings and structures. Even with the replacement of older citrus trees with newer ones, Bothwell Ranch retains historic site and architectural integrity.

As detailed in the National Register Nomination included as **Attachment D**, the property is significant under both Criteria A and B:

Bothwell Ranch is eligible for listing in the National Register of Historic Places at the local level of significance under Criterion A in the area of Agriculture for its association with the once-dominant citrus industry in Los Angeles as the last operating commercial orange grove in the San Fernando Valley, Criterion A in the area of Entertainment for its association with the entertainment industry as the location of the first live outdoor dramatic color television broadcast, and Criterion B in the area of Recreation for its association with prominent rancher, yell king, and vintage vehicle collector Lindley F. Bothwell. The period of significance is 1926, when Bothwell began managing the property as a commercial orange grove, to 2016, when operations at the grove ceased following the death of Bothwell's widow, Ann. Though the significance of Bothwell Ranch stretches back over 50 years to 1926, the property satisfies Criteria Consideration G as the year 2016 provides a clear cut-off date encompassing the extent of Bothwell Ranch's role as the last commercial citrus grove in the San Fernando Valley, operated continuously under the Bothwells for 90 years.

The proposed Project would result in significant impacts to this historic resource, necessitating the preparation of the EIR for the Project. Furthermore, the City's decision to override the recommendation of the Cultural Heritage Commission and not include the property on the list of Historic-Cultural Monuments is not supported by substantial evidence.



**V. THE CONDITIONS OF APPROVAL DO NOT MANDATE THE DESCRIBED PROPERTY DONATION**

The Project is described as including the preservation of the two westernmost lots, to be donated in fee to a public agency and the construction of 1,178 square foot caretaker's residence.<sup>35</sup> This needs to be included as a requirement in the Conditions of Approval.

The Vesting Tentative Tract Findings, for example, state in part:

**1. Site characteristics or existing improvements make strict adherence to zoning regulations impractical or infeasible, the project nonetheless conforms with the intent of those regulations**

Site characteristics and existing improvements necessitate the request to reduce required front and side yards by 20%, however, as discussed further below, the proposed Project conforms to the intent of the applicable zoning regulations.

Relative to the request for a 20% reduction in the side yard for proposed Lot 23, this request responds to the location of the existing structure to remain on Lot 23, which is a lot designated for preservation and donation to the MRCA. The existing building is sited 8 feet from the lot line adjoining Lot 10. . .

**3. The project is in substantial conformance with the purpose, intent and provisions of the General Plan, the applicable community plan and any applicable specific plan.**

The proposed Project includes the merger and resubdivision of the Subject Property into 23 ground lots to allow for the construction of 21 single family homes and the preservation of two lots for dedication to the Mountains Recreation Conservation Authority ("MRCA").

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<sup>35</sup> See also:

Zoning Administrator Determination Findings Oakdale Estates posted 4/14/2023 available at: <https://planning.lacity.gov/pdiscaseinfo/document/NTg3NA0/382be727-91db-4e5c-88e0-bb0f216d41aa/esubmit>

Vesting Tentative Tract Map Findings posted 4/14/2023 available at: <https://planning.lacity.gov/pdiscaseinfo/document/NTg1OQ0/382be727-91db-4e5c-88e0-bb0f216d41aa/esubmit>

Which states on page 11: "Relative to the request for a 20% reduction in the side yard for proposed Lot 23, this request responds to the location of the existing structure to remain on Lot 23, which is a lot designated for preservation and donation to the MRCA. The existing building is sited 8 feet from the lot line adjoining Lot 10."

This dedication to the MRCA is referenced five times the VTT Findings and five different pages of the Zoning Administrator Determination Findings. See also pages 26, 29, 30 and 35 of the attachment to the March 7, 2025 Planning Commission Letter of Determination. The requirement for the described dedication must therefore be made a mandatory Condition of Approval.

**VI. THE CITY'S VTT FINDINGS ARE NOT SUPPORTED BY SUBSTANTIAL EVIDENCE**

In connection with the approval of Vesting Tentative Tract Map No. 83927 the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), made the following findings:

- (a) the proposed map will be/is consistent with applicable general and specific plans
- (b) the design and improvement of the proposed subdivision are consistent with applicable general and specific plans.
- (c) the site is physically suitable for the proposed type of development.
- (d) the site is physically suitable for the proposed density of development.
- (e) the design of the subdivision and the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.
- (f) the design of the subdivision and the proposed improvements are not likely to cause serious public health problems.
- (g) the design of the subdivision and the proposed improvements will not conflict with easements acquired by the public at large for access through or use of property within the proposed subdivision.
- (h) the design of the proposed subdivision will provide, to the extent feasible, for future passive or natural heating or cooling opportunities in the subdivision.

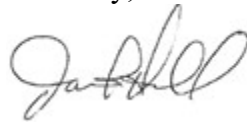
The Advisory Agency erred in making these findings because they are not supported by substantial evidence. For example, the site is not “physically suitable for the proposed type of development” because of the non-compliance with the State Minimum Fire Safe Regulations and LAFD Conditions of Approval. The purpose of the Regulations is to provide for “basic emergency access and perimeter Wildfire protection measures.” 14 CCR § 1273.02

A project that does not comply with the State Minimum Fire Safe Regulations and LAFD Conditions of Approval necessarily will not provide “basic emergency access and perimeter Wildfire protection measures” and as such is not “physically “physically suitable for the proposed type of development.” The same can be said for two other required findings – that the site is “physically suitable for the proposed density of development” and that the “design of the subdivision and the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.” Again, a project that is non-complaint with the State Minimum Fire Safe Regulations and LAFD Conditions of Appeal is necessarily not physically suitable for the proposed density of development and is likely to cause substantial environmental damage.

## **VII. CONCLUSION**

Thank you for your consideration of this matter. I may be contacted at [jamie.hall@channellawgroup.com](mailto:jamie.hall@channellawgroup.com) if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall

Cc: Stephanie Escobar, City Planning Associate ([Stephanie.Escobar@lacity.org](mailto:Stephanie.Escobar@lacity.org))  
Petty Santos, Acting City Clerk ([Petty.Santos@lacity.org](mailto:Petty.Santos@lacity.org))

Encls.

### **Attachments:**

- A. City’s CEQA Streamlining Check List
- B. Appendix 4.1 – Inventory of Adequate Sites for Housing (Table A) from the City’s current Housing Element
- C. VTT Plan Sheets
- D. National Register Nomination
- E. California Board of Forestry and Fire Protection Minimum Fire Safe Regulations in 2021

Channel Law Group, LLP

April 3, 2025

Supplemental Appeal Documentation - 5300 Oakdale Avenue; VTT-83927-HCA-1A, and related cases VTT-83927-HCA, ZA-2023-2170-ZAD-ZV-ZAA, ZA-2023-2170-ZAD-ZV-ZAA-1A, ENV-2020-6762-EIR (Program EIR); Council File No. 25-0310

# **ATTACHMENT A**

## FINDINGS/SPECIAL REQUIREMENTS

### CEQA STREAMLINING CHECKLIST

#### Project Within the Scope of The Housing Element Program EIR



## OVERVIEW

On November 24, 2021, the City Council certified the Citywide Housing Element 2021-2029 and Safety Element Updates Final Environmental Impact Report (EIR), SCH No. 2021010130, EIR No. ENV-2020-672-EIR (Program EIR), to adopt the 2021-2029 Citywide Housing Element and the Updates to the Safety Element and the Plan for a Healthy LA (Health Element). Pursuant to CEQA Guidelines Section 15168(d), the following Proposed Housing Project has been found to be within the scope of the program analyzed in the Program EIR and its environmental effects are within the scope of environmental impacts assessed in the Program EIR.

## TO BE COMPLETED BY PLANNING STAFF ONLY

## PROPOSED HOUSING PROJECT

### Description of Proposed Project:

## DETERMINATIONS

Based upon the attached, “Project Within the Scope of the Housing Element Program EIR Checklist and Analysis,” the whole of the administrative record on the Proposed Housing Project, and a review and consideration of the Program EIR, the decisionmaker finds all the following statements to be true:

1. This Proposed Housing Project is within the scope of the previously approved program for which the Program EIR was certified.
2. This Proposed Housing Project will have no significant environmental effects not examined in the Program EIR.
3. The Program EIR adequately described the Proposed Housing Project for the purposes of California Environmental Quality Act (CEQA).
4. Pursuant to CEQA Guidelines Section 15162, no substantial changes to the project analyzed in the Program EIR are proposed as part of this Proposed Housing Project. Further, no substantial changes have occurred with respect to the circumstances under which the Program EIR was certified, and no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time that the Program EIR was certified as complete, has become available.
5. All applicable mitigation measures, identified in the Program EIR Mitigation Monitoring Program (MMP), necessary to reduce significant impacts to less than significant, or equivalent or more effective substituted mitigation measures, have been incorporated into the Proposed Housing Project or will be made into enforceable obligations on the Proposed Housing Project. A mitigation and monitoring program has been prepared for adoption.

## ATTACHMENT

### PROJECT WITHIN THE SCOPE OF THE HOUSING ELEMENT PROGRAM EIR - CHECKLIST AND ANALYSIS

The following checklist and analysis shall be used to determine if the Proposed Housing Project, described below, is within the scope of the Citywide Housing Element 2021-2029 and Safety Element Updates Final EIR, SCH No. 2021010130, EIR No. ENV-2020-672 (Program EIR), certified by the City Council.

#### A. PROPOSED HOUSING PROJECT

**A.1 Proposed Housing Project Title:**

**A.2 Proposed Housing Project Description:**

**A.3 Project Location Description:**

**A.4 Surrounding Area and Uses:**

**A.5 Project Contact/Owner Information:**



## B. PROGRAM EIR BACKGROUND

### B.1 CEQA Guidelines Section 15168

The California Environmental Quality Act (CEQA) provides for limited environmental review of subsequent projects under a Program EIR. (CEQA Guidelines Section 15168.) Later activities under a continuing program analyzed in the Program EIR must be examined to determine whether any additional environmental analysis must be conducted. (Guidelines Section 15168(c)(1).) If a lead agency finds that pursuant to Guidelines Section 15162, no subsequent EIR would be required, the lead agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document would be required. (Guidelines Section 15168(c)(2).) Whether a later activity is within the scope of a Program EIR is a factual question that the lead agency determines based upon substantial evidence in the record. (Guidelines Section 15168(c)(2).) The lead agency shall incorporate feasible mitigation measures from the Program EIR Mitigation and Monitoring Program (MMP) into later activities in the program. (Guidelines Section 15168(c)(3).) Where the later activities involve site specific operations, the lead agency should use a written checklist to determine whether the environmental effects of the site-specific operations are within the scope of the Program EIR. (Guidelines Section 15168(c)(4).)

### B.2 Program EIR

In certifying the Program EIR and approving the project, the City Council adopted the following findings related to the scope of the project analyzed in the Program EIR and the types of impacts analyzed:

*The EIR analyzed the build out of the Regional Housing Needs Assessment (RHNA), that is the build out of 420,327 housing units in eight years (456,643 RHNA minus 36,316 housing units that have received approvals but have not yet been built and/or received the certificate of occupancy [pipeline projects]). The EIR analyzed the program-level impacts from the full build out of the RHNA, as well as the project-level impacts that occur from the development of the types of housing projects that will be developed from build out of the RHNA. The following types of housing projects were analyzed and within the scope of this EIR:*

- *Multi-family residential, ranging from small apartment buildings with two to 10 units, medium apartment buildings with between 11-49 units, large apartment buildings with between 50-200 units, or larger apartment buildings and high-rise structures with more than 200 units.*
- *Single-family residential, ranging in size and scale from smaller single-family homes to larger single-family homes, small-lot subdivisions and new single subdivisions.*
- *Accessory dwelling units (ADUs), including attached ADUs, detached ADUs, Junior ADUs, ADUs converted from existing floor area, multiple ADUs on lots with existing multi-family dwellings, and Movable Tiny Homes.*
- *Mixed-use development, ranging in size and scale from neighborhood commercial mixed use with smaller nonresidential uses, to high-rise mixed use with larger nonresidential uses.*

- *Conversion and/or rehabilitation of existing nonresidential, residential, or mixed-use structures to be used for housing.*

*Housing types for different income levels were analyzed, including single-resident occupancy and affordable housing that may be for families, seniors, residents with special needs or permanent supportive housing. The EIR also analyzed the impacts from various locations, geographies, and environments where build out of the RHNA could occur, including the following:*

- *Sites currently zoned for residential uses, including multi-family and single-family uses;*
- *Sites currently zoned for commercial uses, which permit residential uses;*
- *Sites currently zoned for hybrid industrial uses, which permit joint live-work residential uses;*
- *Non-vacant sites, and sites with existing housing;*
- *Sites located near public transit;*
- *Sites located in a Historic Preservation Overlay Zone (HPOZ)*
- *Sites located in areas with special environmental considerations, such as areas located by Open Space, Hillside Areas, Very High Fire Hazard Severity Zones (VHFHSZ) or Coastal Zones.*

*To analyze project level impacts to the environment from the variety of housing types and locations that could potentially build to accommodate the RHNA citywide, the City established a team of experienced project planners who have experience in reviewing environmental documents and analyzing or consulting on environmental impacts for housing projects, as well as other development types, across the entire City geography, including project planners who work in the Major Projects Section, who are responsible for reviewing and preparing all EIRs citywide for the Planning Department; planners who work in the Citywide Environmental Policy Unit who are responsible for advising on all CEQA impact issues, training and advising planners on preparing CEQA clearances; as well as, project planners who review and prepare exemptions, negative declarations, mitigated negative declarations, and sustainable communities environmental assessments (SCEAs) within specific geographies in the City. After assembling this consulting team, the City surveyed the thousands of environmental assessments that have been prepared in the last five years for housing development of the type that will build out the RHNA and selected 54 case studies to discuss in the EIR which identify both the typical- and worst-case environmental impacts from housing development. In the survey of environmental assessments, it was determined that the City reviews hundreds of discretionary housing projects every year for CEQA compliance, that the largest majority of housing projects do not require mitigation, as many housing development projects are found to be exempt from CEQA (specifically, hundreds of categorical exemptions are used for small to medium scale housing projects, including Class 32 for infill projects up to 75 units or less); and less than 10 percent of discretionary housing projects require an EIR due to significant and unavoidable impacts. Based on this, the case studies are more heavily weighted towards larger scale projects or those in sensitive environments that are more likely to have significant impacts. Smaller projects in more urban infill areas typically do not require an EIR, a mitigated negative declaration, or SCEA, unless there are specific site conditions, such as historical resources, site contamination, or archaeological resources, that raise potential environmental*

*impact concerns. The case studies, which include EIRs, mitigated negative declarations, and SCEAs, were selected based on the type of project (e.g., multi-family residential, single-family residential, ADUs, mixed-use development, and conversion and/or rehabilitation), scale of project (single-family to large tower/mixed use), locations with the broadest range of geographies and environmental conditions, and levels of development and density (hillsides, urban, regional centers, coastal, and suburban areas), as well as projects that include income-restricted projects. The intent was to be conservative and identify all of the reasonably foreseeable ways housing can result in environmental impacts in the City, as well as identifying the best mitigation measures developed to address those impacts. The City finds the case studies reviewed in the EIR and their identified level of impacts (i.e., no impacts, less than significant impacts, less than significant impacts with mitigation, and significant and unavoidable impacts) are representative of the typical- and worst-case environmental impacts of housing development to be built to accommodate the RHNA. Also, the City finds that it is not reasonably foreseeable that housing development that will build out the RHNA will have significant impacts in those impact categories that were scoped out in the Initial Study (Appendix A to the FEIR). Additionally, the City finds the mitigation measures, developed in the EIR and included in the MMP, to be used by projects within the scope of the EIR, are comprehensive and based on the screening criteria included in those mitigation measures, further studies, and performance standards will, in a majority of circumstances, reduce environmental impacts from housing development to less than significant. However, based on the findings below and the EIR analysis, even with the application of the mitigation measures in the MMP, significant impacts identified in the Program EIR Findings can still occur from housing development of all types throughout the City. The City Council finds the EIR has analyzed and identified the significant impacts that are reasonably foreseeable from housing development in the City for the types of housing projects (described above) that will accommodate the RHNA. (Appendix A: Citywide Housing Element 2021-2029 and Safety Element Updates Final EIR, CEQA Findings of Facts and Statement of Overriding Considerations.)*

Additional information regarding the Project that was analyzed in the Program EIR is provided in the Project Description, Section 3, of the Draft EIR, available online at:  
[https://planning.lacity.org/eir/HEU\\_2021-2029\\_SEU/deir/files/3\\_Project%20Description.pdf](https://planning.lacity.org/eir/HEU_2021-2029_SEU/deir/files/3_Project%20Description.pdf).

### **B.3 Environmental Impacts Analyzed in the Program EIR**

The environmental impacts analyzed and the impact conclusions identified for Projects within the Scope of the Program EIR are shown in [Appendix A, CEQA Findings of Facts and Statement of Overriding Consideration for the 2021-2029 Citywide Housing Element and Safety Element Updates](#), and in the Program EIR, which may be found at <https://planning.lacity.org/development-services/eir>.

### **B.4 Program EIR Mitigation Measures**

The City Council adopted the [MMP for the 2021-2029 Housing Element](#), provided in Appendix B. The MMP provides that, subject to City authority, the applicable mitigation measures in the MMP shall be imposed as conditions of approval for a project analyzed as a subsequent approval pursuant to CEQA Guidelines Section 15168.

## C. FINDING THAT THE PROPOSED HOUSING PROJECT IS A PROJECT WITHIN THE SCOPE OF THE PROGRAM FOR WHICH THE PROGRAM EIR WAS CERTIFIED

Check all of the boxes in Table C-1 that describe the Proposed Housing Project and all of the boxes in Table C-2 that describe the location of the Proposed Housing Project:

**Table C-1**

<input type="checkbox"/> <b>Multi-family residential development</b> – Range from small apartment buildings with two to 10 units, medium apartment buildings with between 11-49 units, large apartment buildings with between 50-200 units, or larger apartment buildings and high-rise structures with more than 200 units
<input type="checkbox"/> <b>Single-family residential development</b> – Range in size and scale from smaller single-family homes to larger single-family homes, small lot subdivisions, and new single-family subdivisions
<input type="checkbox"/> <b>Accessory dwelling unit (ADU)</b> - Include attached ADUs, detached ADUs, Junior ADUs, ADUs converted from existing floor area, multiple ADUs on lots with existing multi-family dwellings, and Movable Tiny Houses
<input type="checkbox"/> <b>Mixed-use development</b> - Range in size and scale from neighborhood commercial mixed use with smaller nonresidential uses, to high-rise mixed-use with larger nonresidential uses
<input type="checkbox"/> <b>Conversion and/or rehabilitation</b> – Existing nonresidential, residential and mixed-use structures to be converted/rehabilitated for housing
<input type="checkbox"/> <b>Housing type for different income levels</b> , including single-resident occupancy and affordable housing that may be for families, seniors, residents with special needs or permanent supportive housing

**Table C-2**

<input type="checkbox"/> Currently zoned for residential uses, including multi-family and single-family uses
<input type="checkbox"/> Currently zoned for commercial uses, which permit residential uses
<input type="checkbox"/> Currently zoned for hybrid industrial uses, which permit joint live-work residential uses
<input type="checkbox"/> Non-vacant site, or sites with existing housing

<input type="checkbox"/> Located near public transit (i.e., within ½ mile of a Major Transit Stop) <sup>1</sup>
<input type="checkbox"/> Located in a Historic Preservation Overlay Zone (HPOZ)
<input type="checkbox"/> Located in areas with special environmental considerations, such as areas located by Open Space, Hillside Areas, Very High Fire Hazard Severity Zones (VHFHSZ) or Coastal Zone
<input type="checkbox"/> Site included in in the Housing Element Inventory of Adequate Sites, including Appendices 4.1, 4.2, 4.3, and 4.8 of the 2021-2029 Housing Element <sup>2</sup>
<input type="checkbox"/> Site identified to be rezoned to allow residential uses or to allow multi-family residential uses as a greater density in the Candidate of Sites for Rezoning, Appendix 4.7 of the 2021-2029 Housing Element <sup>3</sup>

## CONCLUSION

Check the following:

### ☐ **AT LEAST ONE BOX IN TABLE C-1 AND AT LEAST ONE BOX IN TABLE C-2 IS CHECKED**

The Proposed Housing Project is within the scope of the program that was analyzed in the Program EIR. Go to Section D and E to determine if the site-specific environmental effects of the Proposed Housing Development are within the scope of the Program EIR.

### ☐ **NONE OF THE BOXES IN TABLE C-1 ARE CHECKED OR NONE OF THE BOXES IN TABLE C-2 ARE CHECKED.**

The Proposed Housing Project is not within the scope of the program that was analyzed in the Program EIR. A separate environmental analysis is required.

<sup>1</sup> PRC Section 21064.3 defines a “major transit stop” as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods ([ZI No. 2452](#)).

<sup>2</sup> See Draft EIR at page 3-32.

<sup>3</sup> See Draft EIR at page 3-32.

## D. MITIGATION MEASURES APPLICABLE TO THE PROPOSED HOUSING PROJECT

The following mitigation measures (MMs) from the [MMP \(Appendix B\)](#) are relevant and applicable to the Proposed Housing Project based on the mitigation measure thresholds of applicability and based on a review of the Proposed Housing Project:

Check all MMs from the MMP that are applicable to the Project:

Mitigation Measure		Applies to Proposed Housing Project
<b>Air Quality</b>		
4.2-2(a)	Construction Emissions Reduction	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.2-2(b)	Operations Emissions Reduction	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.2-3	Construction TAC Reduction Measures	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Biological Resources</b>		
4.3-1(a)	Biological Resources Reconnaissance Survey and Reporting	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.3-1(b)	Sensitive Species/Habitat Avoidance: Pre-Construction Bird Nest Surveys, Avoidance, and Notification	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.3-1(c)	Focused Surveys for Rare Plants	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.3-1(d)	Adaptive Management Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.3-2(a)	Habitat Mitigation and Monitoring Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.3-2(b)	Protected Tree and Tree Canopy Survey	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Cultural Resources</b>		
4.4-1(a)	Identification of Built-Environment Historical Resources	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.4-1(b)	Rehabilitation of Historical Resources	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.4-1(c)	Design Requirements for New Construction	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.4-1(d)	Relocation and Rehabilitation of Historical Resources	<input type="checkbox"/> Yes <input type="checkbox"/> No



Mitigation Measure		Applies to Proposed Housing Project
4.4-1(e)	Historic American Building Survey Documentation	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.4-1(f)	Interpretive Program	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.4-1(g)	Construction Monitoring, Salvage, and Reuse	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.4-1(h)	Temporary Protective Relocation	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.4-1(i)	Excavation and Shoring Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.4-1(j)	Structural Construction Monitoring	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.4-2	Archaeological Resources	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Geology and Soils</b>		
4.5-1(a)	Paleontological Procedures for Discretionary Projects	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.5-1(b)	Worker Environmental Awareness Program, Fossil Salvage, and Construction Monitoring	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.5-1(c)	Construction Monitoring	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.5-1(d)	Fossil Discovery, Salvage, and Treatment	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Hazards and Hazardous Materials</b>		
4.7-2(a)	Environmental Site Assessment	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.7-2(b)	Site Remediation and Health and Safety Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Hydrology and Water Quality</b>		
4.8-1	Drainage Pattern Alterations and Flood Control	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Noise</b>		
4.10-1(a)	Noise Shielding and Silencing	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.10-1(b)	Use of Driven Pile Systems	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.10-1(c)	Enclosures and Screening	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.10-1(d)	Construction Staging Areas	<input type="checkbox"/> Yes <input type="checkbox"/> No



Mitigation Measure		Applies to Proposed Housing Project
4.10-1(e)	Temporary Sound Barriers	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.10-1(f)	Project-Specific Construction Noise Study	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.10-2	Project-Specific Operational Noise Study	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.10-3(a)	Vibration Control Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.10-3(b)	Vibration Mitigation	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Public Services</b>		
4.12-1(a)	Design Plans Review	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.12-1(b)	Emergency Access	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.12-1(c)	Hillside Fire/Vegetation Management Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.12-1(d)	Submittal of Plot Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.12-2(a)	Crime Prevention Unit Consultation	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.12-2(b)	Security During Construction	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Transportation</b>		
4.14-1	Construction Management Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.14-2	Transportation Demand Management Program	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Tribal Cultural Resources</b>		
4.15-1(a)	Native American Consultation and Monitoring for Discretionary Projects	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.15-1(b)	Discovery of Potential Tribal Cultural Resources	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Wildfire</b>		
4.17-1	Hillside Construction Staging and Parking Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.17-3	Undergrounding of Power Lines in and Near an SRA and VHFHSZs	<input type="checkbox"/> Yes <input type="checkbox"/> No

## Substitute Mitigation Measures

### THE APPLICANT FOR THE PROPOSED HOUSING PROJECT IS PROPOSING SUBSTITUTED MITIGATION MEASURES FOR ANY OF THE MITIGATION MEASURES THAT ARE CHECKED ABOVE

☐ Yes ☐ No

If YES, include the substituted mitigation measures below, with the necessary findings showing the mitigation measure is equal or more effective to the mitigation measures in the Mitigation Measure Program at reducing the significant impact to less than significant and no new significant impact will result from the substitution:

Any attachments or technical studies that support findings will need to be printed out and attached to the Appendix and will be included in the project file.

### THE APPENDIX WILL BE FILLED OUT

☐ Yes ☐ No

*Planner to fill out the Appendix page at the end of the checklist to list any substituted measures and any additional pages to support findings.*

## CONCLUSION

Check one of the following (Note: this may require the analysis in Section E to be completed first):

- ☐ None of the mitigation measures from the MMP are applicable to the Proposed Housing Project.
- ☐ All applicable mitigation measures (including substitute measures) will be imposed on the Proposed Housing Project through conditions of approval, or have already been incorporated into the Proposed Housing Project.
- ☐ Not all applicable mitigation measures will be imposed on the Proposed Housing Project through conditions of approval, or have already been incorporated into the Proposed Housing Project.

## E. FINDING THAT SITE SPECIFIC EFFECTS FROM THE PROPOSED HOUSING PROJECT WERE ANALYZED IN THE PROGRAM EIR

### E.1 Screening Criteria

The following screening questions shall be answered to evaluate whether the Proposed Housing Project has the potential for site-specific or project-specific circumstances or conditions to result in an environmental effect not examined in the Program EIR. If any of the following questions are answered 'Yes', further analysis will be required in Section E.2.

- a. Do any mitigation measures from the MMP require further analysis or study? ☐ Yes ☐ No

If Yes, prepare any studies and conduct any analysis required by the mitigation measure, per Section E.2.

- b. Does the Proposed Housing Project lack compliance with a mitigation measure (including a substitute mitigation measure) identified as applicable to the Proposed Housing Project in Section D? ☐ Yes ☐ No

If Yes, conduct an analysis to determine if the environmental effect was examined in the Program EIR, per Section E.2.

- c. Would the Proposed Housing Project require a variance or specific plan exception to provide relief from a standard required to protect scenic resources or scenic quality in an adopted Code, Specific Plan, or overlay ordinance (e.g., the Mulholland Scenic Parkway Specific Plan, the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan)? ☐ Yes ☐ No

If Yes, conduct an analysis of Aesthetic Threshold 4.1-1 and 4.1-2 to determine if the Proposed Housing Project will have an effect that was not examined in the Program EIR, per Section E.2.

- d. Would the Proposed Housing Project involve the modification or destruction of a scenic resource or obstruction of public view of a scenic resource? ☐ Yes ☐ No

If Yes, conduct an analysis of Aesthetic Threshold 4.1-1 and 4.1-2 to determine if the Proposed Housing Project will have an effect that was not examined in the Program EIR, per Section E.2.

- e. Would the Proposed Housing Project involve rezoning agriculturally zoned land? ☐ Yes ☐ No

If Yes, conduct an analysis of Agricultural Threshold 2 to determine if the Proposed Housing Project will have an effect that was not examined in the Program EIR, per Section E.2.

- f. Would the Proposed Housing Project be within 50 feet of a fault delineated on the Alquist-Priolo Earthquake Fault Zoning Map?

☐ Yes ☐ No

If Yes, conduct an analysis of Geology Threshold 1a to determine if the Proposed Housing Project will have an effect that was not examined in the Program EIR, per Section E.2.

- g. Would the Proposed Housing Project result in significant impacts to VMT using the thresholds and methodology provided in the LADOT Transportation Assessment Guidelines?

☐ Yes ☐ No

If Yes, conduct an analysis of VMT to determine if the Proposed Housing Project will have an effect that was not examined in the Program EIR, per Section E.2.

- h. Would the Proposed Housing Project have peculiar or unique project or site characteristics from those analyzed in the Program EIR that could result in an effect not examined in the Program EIR (e.g., projects that conflict with an adopted Airport Land Use Plan or Water Quality Management Plan, or sites in use for mineral resource recovery (does not include oil and gas), projects involving septic tanks)?

☐ Yes ☐ No

If Yes, conduct an analysis to determine if the Proposed Housing Project will have an effect that was not examined in the Program EIR, per Section E.2.

## CONCLUSION

After finishing review of the screening questions in Section E.1, check one of the following boxes.

- ☐ **ALL SCREENING QUESTIONS ARE MARKED 'NO'**

Pursuant to CEQA Guidelines Section 15168(c)(4), the environmental effects of the Proposed Housing Project were within the scope of the Program EIR. Prepare a Mitigation and Monitoring Program for the Proposed Housing Project. No further analysis is required.

- ☐ **ONE OR MORE SCREENING QUESTIONS ARE MARKED 'YES'**

Go to Section E.2.

## E.2 Analysis to Determine if the Proposed Housing Project Would Have Effects Not Examined in the Program EIR

### Instructions:

Conduct all analysis required in Section E.1 to determine if the Proposed Housing Project would have one or more environmental site- or project-specific effect(s) not examined in the Program EIR.

The following site- or project-specific effects are not effects that were examined in and within the scope of the Program EIR:

- a significant impact that would result because the Proposed Housing Project will not comply with a mitigation measure found applicable to the Proposed Housing Project from Appendix B, or will not comply with a substituted mitigation measure of equal or equivalent effectiveness (see Conclusion in Section D).
- a significant impact in an impact category found in the Program EIR to be less than significant, less than significant with mitigation, or have no impact;
- a significant impact that cannot be mitigated to less than significant with mitigation measures in Appendix B or by a substituted mitigation measure, in any of the following impact categories, which are impacts that by their nature would have impacts unique to the resource(s):
  - to a historical resource;
  - to a biological resource;
  - to an archaeological resource;
  - to a paleontological resource;
  - to tribal cultural resources;
  - related to hazardous materials; or
  - related to wildfires.

Without limitation, the following effects from a Proposed Housing Project are effects examined in and within the scope of the Program EIR:

- a significant and unavoidable impact related to criteria pollutant air quality standards from construction NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions;
- a significant and unavoidable impact related to criteria pollutant air quality standards from operational NO<sub>x</sub>, VOC, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions; or
- a significant and unavoidable impact (project or cumulative) related to construction and operational noise or vibration impacts.


## CONCLUSION

**Based on the analysis above, and the whole of the administrative record, substantial evidence supports that (check one):**

- ☐ **THE PROPOSED HOUSING PROJECT WILL NOT HAVE EFFECTS NOT EXAMINED IN THE PROGRAM EIR.**

The Proposed Housing Project is fully within the scope of the program and its impacts were examined in the Program EIR. Prepare a Mitigation and Monitoring Program for the Proposed Housing Project for all mitigation measures identified in Subsection D and E, as applicable. No additional environmental analysis documents need to be prepared.

- ☐ **THE PROPOSED HOUSING PROJECT WILL HAVE ONE OR MORE EFFECTS NOT EXAMINED IN THE PROGRAM EIR.**



---

A tiered negative declaration or tiered environmental impact report will be prepared for the following environmental effect(s) pursuant to CEQA Guidelines Section 15152:

**Impacts to be Analyzed in Tiered CEQA Clearance:**

All other effects are within the scope of the Program EIR and require no further analysis pursuant to CEQA Guideline Section 15152. The analysis provided herein shall be relied upon, in part, to support adoption of the tiered document as only being required to analyze the above listed impact(s).



---

## APPENDIX

### SUBSTITUTED MITIGATION MEASURES

List any Substituted Mitigation Measures, if any, along with any additional documents to support findings in the section below:

## ANALYSIS

Complete, as applicable, based on Sections E.1 and E.2 above. Please attach any technical studies required and summarize the impact and the required mitigation measures and/or monitoring program for the Proposed Housing Project.

The following analysis is provided as required based on the following question from Section E.1 and E.2:



Channel Law Group, LLP

April 3, 2025

Supplemental Appeal Documentation - 5300 Oakdale Avenue; VTT-83927-HCA-1A, and related cases VTT-83927-HCA, ZA-2023-2170-ZAD-ZV-ZAA, ZA-2023-2170-ZAD-ZV-ZAA-1A, ENV-2020-6762-EIR (Program EIR); Council File No. 25-0310

# **ATTACHMENT B**

Due to file size, please access **Attachment B**  
via the following link:

<https://www.dropbox.com/scl/fi/4um2wc9z2okd31a5y1b3f/Attachment-B-Appendix-4.1-Housing-Element-Sites-Inventory-Table-A-1.pdf?rlkey=xkfouh07359vgdtxfxn35x2xp&st=g15lwxnw&dl=0>

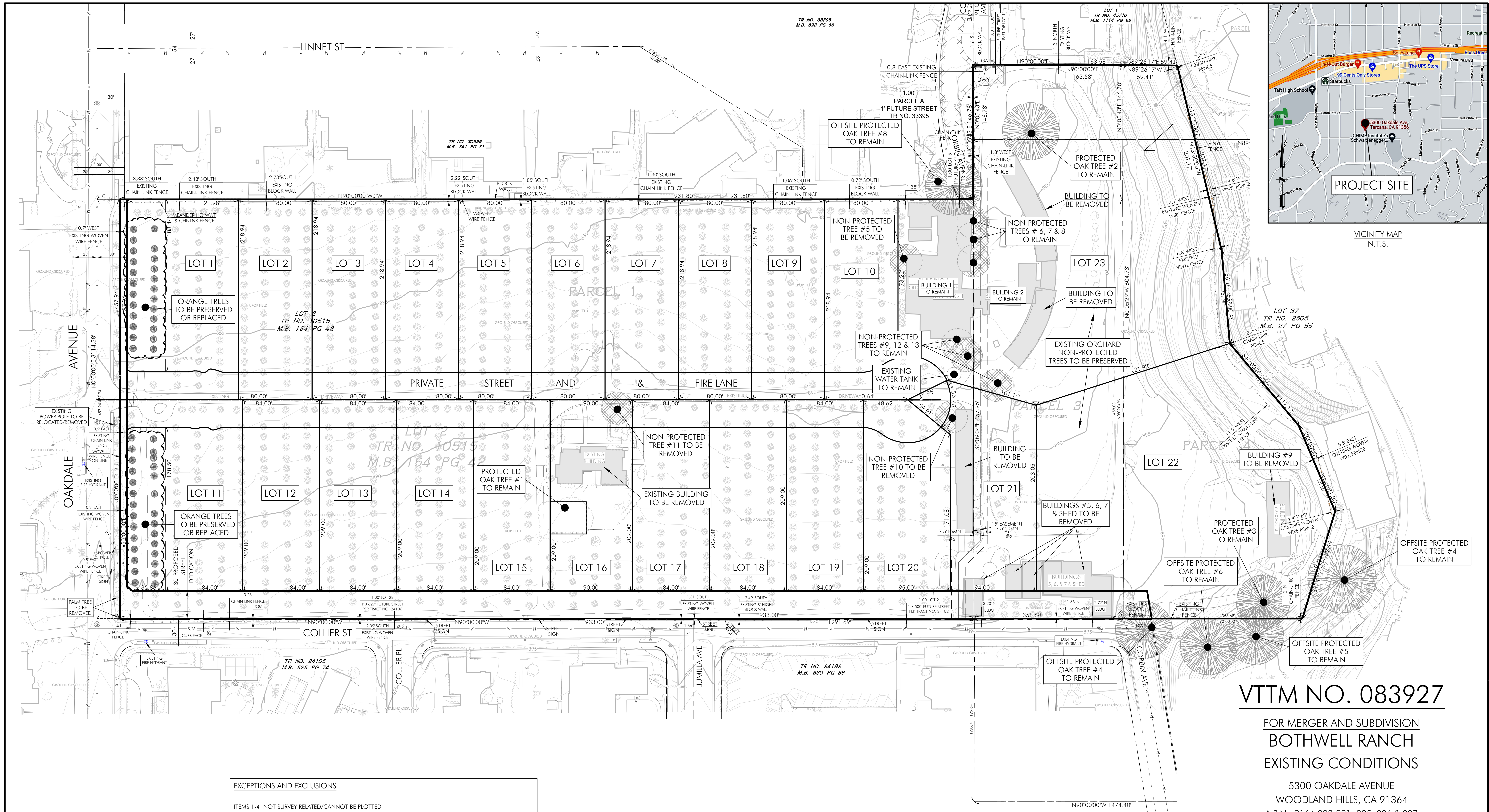
Channel Law Group, LLP

April 3, 2025

Supplemental Appeal Documentation - 5300 Oakdale Avenue; VTT-83927-HCA-1A, and related cases VTT-83927-HCA, ZA-2023-2170-ZAD-ZV-ZAA, ZA-2023-2170-ZAD-ZV-ZAA-1A, ENV-2020-6762-EIR (Program EIR); Council File No. 25-0310

# ATTACHMENT C





# VTTM NO. 083927

## FOR MERGER AND SUBDIVISION BOTHWELL RANCH EXISTING CONDITIONS

5300 OAKDALE AVENUE  
WOODLAND HILLS, CA 91364  
A.P.N.: 2164-008-001, 005, 006 & 007

### LEGAL DESCRIPTION

PARCEL 1: (APN: 2164-008-001)  
LOT 2, OF TRACT NO. 10515, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 164, PAGE 42, OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 2: (APN: 2164-008-005)  
THE WEST 163.58 FEET OF SOUTH 81.81 FEET OF LOT 36, OF TRACT NO. 2605, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 27, PAGES 55 TO 75, OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 3: (APN: 2164-008-006)  
THE WEST 163.58 FEET OF THE NORTH 522.98 FEET OF LOT 37, OF TRACT NO. 2605, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 27, PAGES 55 TO 75, OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 4: (APN: 2164-008-007)  
PART OF LOTS 36 AND 37, OF TRACT NO. 2605, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 27, PAGES 55 TO 75, OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

November 10, 2023

PREPARED BY:

**PACIFIC COAST CIVIL, INC.**  
30141 AGOURA ROAD, SUITE 200  
AGOURA HILLS, CA 91301  
PH: (818) 865-4168  
WWW.PACIFICCOASTCIVIL.COM

*Richard E. Doss*  
RICHARD E. DOSS  
R.C.E. C48987

OWNER/DEVELOPER:

**OAKDALE ESTATES, LLC**  
11766 WILSHIRE BLVD., SUITE 820  
LOS ANGELES, CA 90025  
P: (310) 582-1991 X203  
C: (310) 864-3330

DATE

11/10/23

SHEET: 1 OF 3

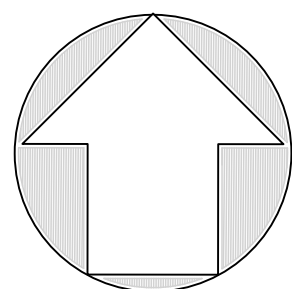
### EXCEPTIONS AND EXCLUSIONS

ITEMS 1-4 NOT SURVEY RELATED/CANNOT BE PLOTTED

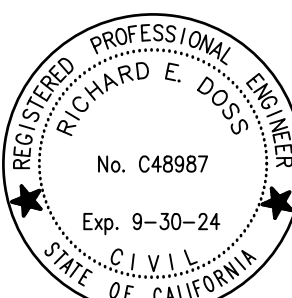
5. AN EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES, RECORDED IN BOOK 6028 OF DEEDS, PAGE 236,
- IN FAVOR OF: SOUTHERN CALIFORNIA EDISON COMPANY, A CALIFORNIA CORPORATION
- AFFECTS: BLANKET IN NATURE - NOT DELINEATED ON MAP
6. AN EASEMENT FOR RIGHT-OF-WAY FOR WATER PIPELINE AND INCIDENTAL PURPOSES, RECORDED MARCH 10, 1978 AS INSTRUMENT NO. 1978-259471 OF OFFICIAL RECORDS
- IN FAVOR OF: CITY OF LOS ANGELES
- AFFECTS: PARCELS 1, 2, & 3 - PLOTTED HEREON

### LEGEND:

- FIRE HYDRANT
- SANITARY MANHOLE
- ORANGE TREE TO BE PRESERVED
- ORANGE TREE TO BE REMOVED
- PALM TREES ALONG OAKDALE TO BE PRESERVED
- PALM TREES ALONG OAKDALE TO BE REMOVED
- CENTERLINE
- PROJECT PROPERTY LINE
- PROPOSED PROPERTY LINE
- EXISTING LOT LINE
- ROW
- BUILDING
- CENTER LINE
- CORNER
- FLOW LINE
- TOP OF CURB
- TOP OF DRAIN GRATE
- TOP OF WALL



SCALE: 1" = 40'



SURVEY PREPARED BY:

**PACIFIC COAST CIVIL, INC.**  
30141 AGOURA ROAD, SUITE 200  
AGOURA HILLS, CA 91301  
PH: (818) 865-4168  
WWW.PACIFICCOASTCIVIL.COM



### PROJECT PARCEL SIZE:

GROSS AREA: (BLUE BORDER) 612,868 SQ.FT. (14.07 AC)  
PUBLIC STREET DEDICATION: 33,820 (0.78 AC)  
NET AREA = GROSS - STREET DEDICATION: 579,049 SQ.FT. (13.29 AC)

**REVISED**

8:34 am, Jan 09, 2024

### BASIS OF BEARING:

THE BEARING OF NORTH ALONG THE CENTERLINE OF SHIRLEY AVENUE AS SHOWN ON MAP OF TRACT NO. 17011, M.B. 601 PG 01

### BENCHMARK:

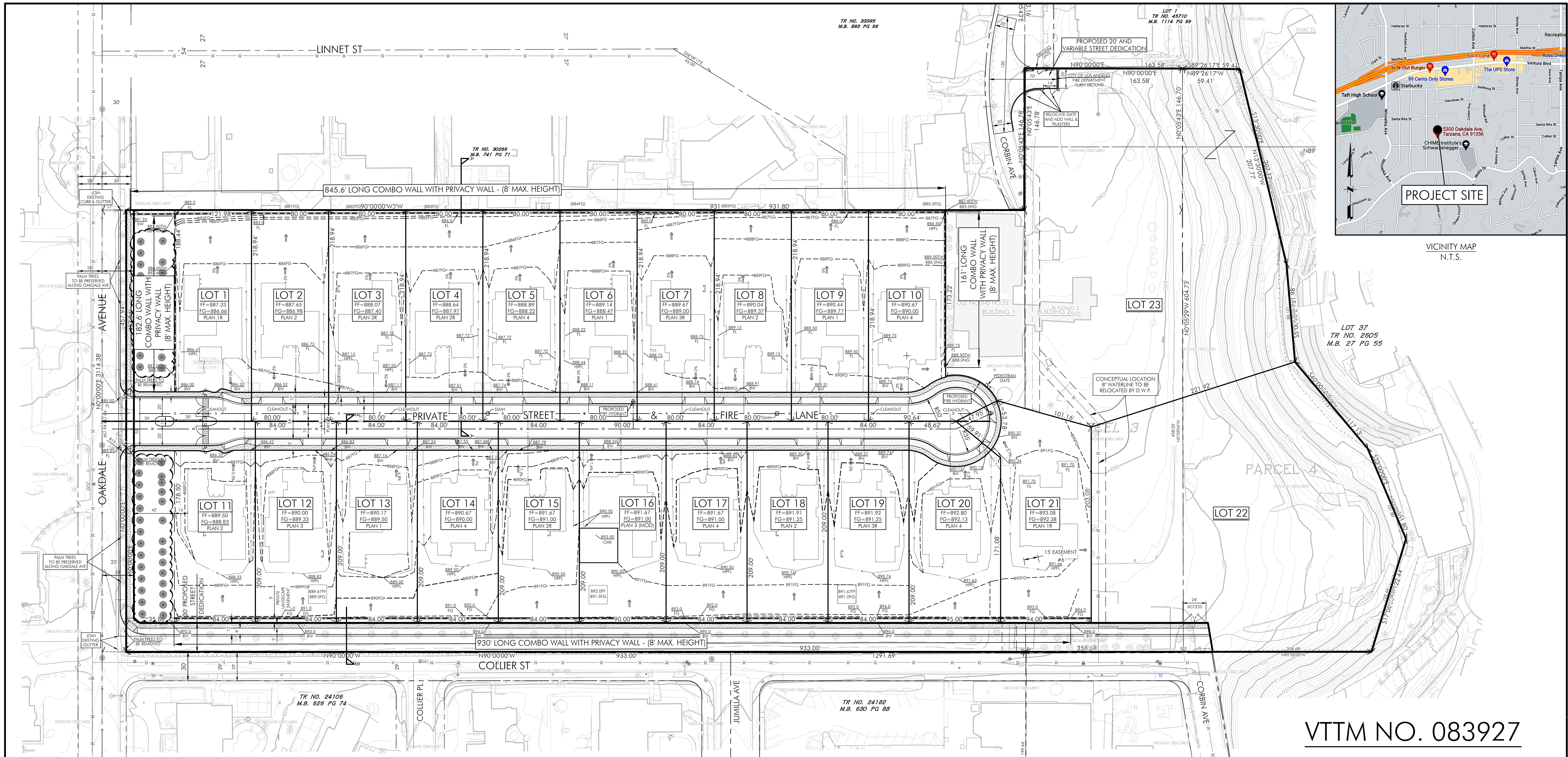
BM: # 07-10311 DATUM: NAVD 1988 YEAR: 2000

WIRE SPK IN S CURB VENTURA BLVD; 3FT W OF B C CURB RET W OF CORBIN AVE

ELEVATION: 834.870 (FEET)

254.469 (METERS)





SURVEY PREPARED BY:

**PACIFIC COAST CIVIL, INC.**  
30141 AGOURA ROAD, SUITE 200  
AGOURA HILLS, CA 91301  
PH: (818) 865-4168  
WWW.PACIFICCOASTCIVIL.COM

SOILS ENGINEER:

**ALBUS & ASSOCIATES, INC.**  
1011 N. ARMANDO STREET  
ANAHEIM, CA 92806-2606  
PHONE: (714) 630-1626  
J.N.: 3064.00  
DATED: APRIL 26, 2022

ZONING: RA-1

EARTHWORK

ESTIMATED CUT: 13,000 C.Y.  
ESTIMATED FILL: 13,000 C.Y.

BALANCE ON SITE

BASIS OF BEARING:

THE BEARING OF NORTH ALONG THE CENTERLINE OF  
SHIRLEY AVENUE AS SHOWN ON MAP OF TRACT NO. 17011,  
M.B. 601 PG 01

BENCHMARK:

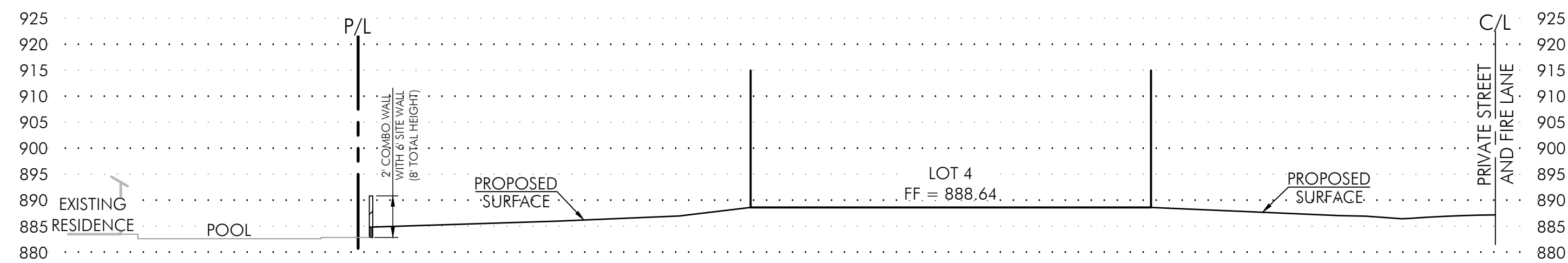
BM: # 07-10311 DATUM: NAVD 1988 YEAR: 2000

WIRE SPK IN S CURB VENTURA BLVD; 3FT W OF B C CURB RET  
W OF CORBIN AVE

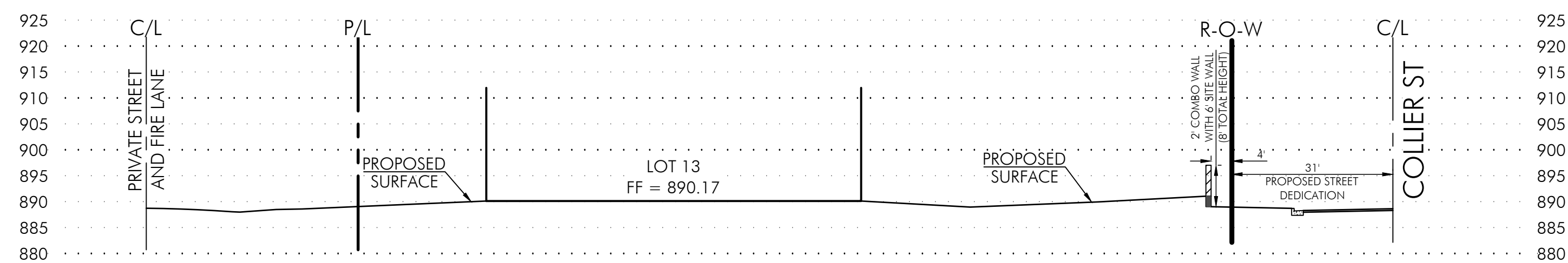
ELEVATION: 834.870 (FEET)

254.469 (METERS)

**REVISED**  
8:35 am, Jan 09, 2024



SECTION A-A  
SCALE: 1" = 20'



SECTION B-B  
SCALE: 1" = 20'

LEGEND:

- FIRE HYDRANT
- SANITARY MANHOLE
- RAIN HARVEST TANKS
- RETAINING WALL
- CENTERLINE
- PROJECT PROPERTY LINE
- PROPERTY LINE
- LOT LINE
- ROW
- BLDG
- CL
- COR
- FF
- FL
- FG
- TC
- TDG
- TW
- FINISH FLOOR
- FLOW LINE
- FINISH GROUND
- TOP OF CURB
- TOP OF DRAIN GRATE
- TOP OF WALL

PROJECT PARCEL SIZE:

GROSS AREA: (BLUE BORDER) 612,868 SQ. FT. (14.07 AC)  
PUBLIC STREET DEDICATION: 33,820 (0.78 AC)  
NET AREA = GROSS - STREET DEDICATION: 579,049 SQ. FT. (13.29 AC)

**VTTM NO. 083927**

FOR MERGER AND SUBDIVISION  
**BOTHWELL RANCH**  
PROPOSED RESIDENTIAL LIVING

5300 OAKDALE AVENUE  
WOODLAND HILLS, CA 91364  
A.P.N.: 2164-008-001, 005, 006 & 007

LEGAL DESCRIPTION

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PARCEL 2: (APN: 2164-008-005)  
THE WEST 143.58 FEET OF SOUTH 81.81 FEET OF LOT 36, OF TRACT NO. 2605, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 27, PAGES 55 TO 75, OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.  
PARCEL 3: (APN: 2164-008-006)  
THE WEST 163.58 FEET OF THE NORTH 522.98 FEET OF LOT 37, OF TRACT NO. 2605, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 27, PAGES 55 TO 75, OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.  
PARCEL 4: (APN: 2164-008-007)  
PART OF LOTS 36 AND 37, OF TRACT NO. 2605, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 27, PAGES 55 TO 75, OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

November 10, 2023

PREPARED BY:

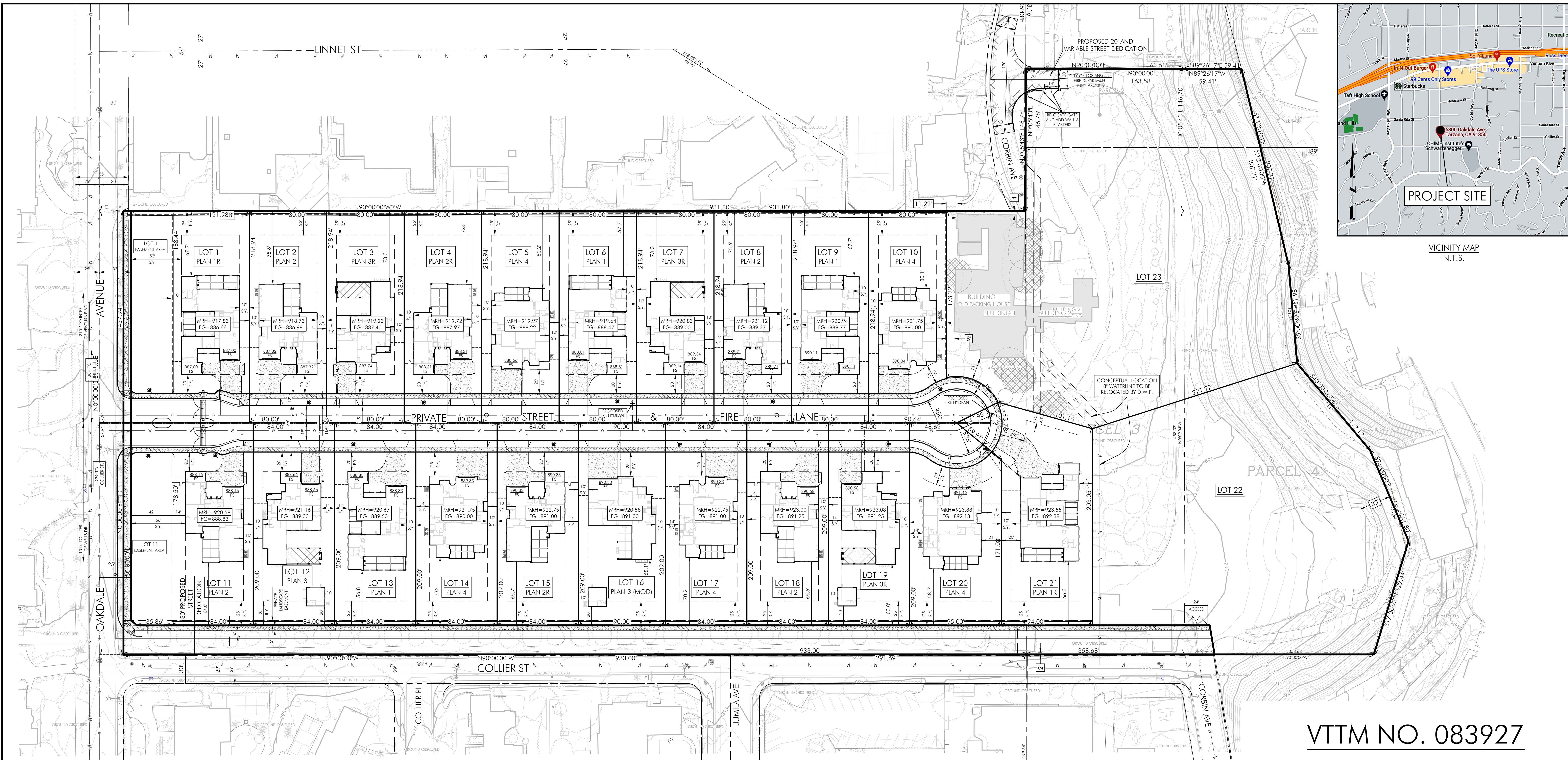
**PACIFIC COAST CIVIL, INC.**  
30141 AGOURA ROAD, SUITE 200  
AGOURA HILLS, CA 91301  
PH: (818) 865-4168  
WWW.PACIFICCOASTCIVIL.COM

OWNER/DEVELOPER:

**OAKDALE ESTATES, LLC**  
11766 WILSHIRE BLVD., SUITE 820  
LOS ANGELES, CA 90025  
P: (310) 582-1991 X203  
C: (310) 864-3330

**Richard E. Doss** 11/10/23  
RICHARD E. DOSS R.C.E. C48987 DATE





VICINITY MAP  
N.T.S.

# VTTM NO. 083927

FOR MERGER AND SUBDIVISION  
**BOTHWELL RANCH**  
PROPOSED RESIDENTIAL LIVING

5300 OAKDALE AVENUE  
WOODLAND HILLS, CA 91364  
A.P.N.: 2164-008-001, 005, 006 & 007

## LEGAL DESCRIPTION

PARCEL 1: (APN: 2164-008-001)  
LOT 2, OF TRACT NO. 10515, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 164, PAGE 42, OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 2: (APN: 2164-008-005)  
THE WEST 143.58 FEET OF SOUTH 81.81 FEET OF LOT 36, OF TRACT NO. 2605, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 27, PAGES 55 TO 75, OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

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November 10, 2023

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PH: (818) 865-4168  
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*Richard E. Doss*  
RICHARD E. DOSS  
R.C.E. C48987

OAKDALE ESTATES, LLC  
11766 WILSHIRE BLVD., SUITE 820  
LOS ANGELES, CA 90025  
P: (310) 582-1991 X203  
C: (310) 864-3330

11/10/23

DATE

## MINIMUM LOT SIZE:

MINIMUM LOT FRONTAGE: 70'  
FRONT YARD: 20 FEET MINIMUM OR 20% OF THE DEPTH OF THE LOT, WITH A MAXIMUM REQUIREMENT OF 25 FEET.  
SIDE YARDS: 10 FEET MINIMUM  
REAR YARDS: 25% OF THE DEPTH OF THE LOT, WITH A MAXIMUM REQUIREMENT OF 25 FEET.  
MINIMUM LOT SIZE: 17,500 SQ. FT.

## BASIS OF BEARING:

THE BEARING OF NORTH ALONG THE CENTERLINE OF SHIRLEY AVENUE AS SHOWN ON MAP OF TRACT NO. 17011, M.B. 601 PG 01

## BENCHMARK:

BM: # 07-10311 DATUM: NAVD 1988 YEAR: 2000  
WIRE SPK IN S CURB VENTURA BLVD; 3FT W OF B C CURB RET W OF CORBIN AVE  
ELEVATION: 834.870 (FEET) 254.469 (METERS)

## LEGEND:

RETAINING WALL  
CENTERLINE  
PROJECT PROPERTY LINE  
PROPERTY LINE  
LOT LINE  
ROW  
LED POST TOP LIGHT  
W/ EXTERNAL MOTION SENSOR

MRH MAX. ROOF HEIGHT  
FG FINISH GROUND  
FS FINISH SURFACE  
F.Y. FRONT YARD  
S.Y. SIDE YARD  
R.Y. REAR YARD

## UTILITY PROVIDERS:

CONTACT THE FOLLOWING, AS REQUIRED, 48 HOURS PRIOR TO EXCAVATION:  
**USA DIG ALERT**  
(800) 227-2600 OR (818) 374-5090  
**CITY OF L.A. POWER**  
(818) 771-4184  
ATTN: MICHAEL DUTSMAN  
**SOUTHERN CALIFORNIA GAS**  
(818) 701-2530  
ATTN: DAVE MARSHALL  
**VALLEY DISTRICT SANITATION**  
(818)374-5090  
ATTN: BELINDA WOODRUFF  
**CITY OF L.A. WATER**  
(213) 367-2130  
ATTN: HUGO TORRES  
**ATT COMMUNICATIONS**  
(800)288-2020  
**STORM DRAIN**  
(818)374-4838

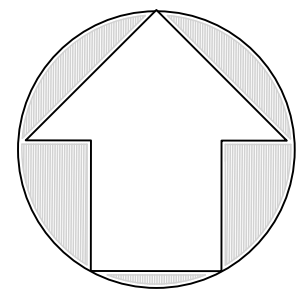
PROJECT SUMMARY TABLE										
LOT NO.	LOT SIZE (GROSS)		LOT SIZE (NET) (LESS PRIVATE STREET)		PLAN	RESIDENTIAL SQ. FT.	A.D.U. SQ. FT.	FINISH GRADE ELEVATION	ZONING MAX. BUILDING HEIGHT	A.D.U. MAX. BUILDING HEIGHT
	(AC)	(SQ. FT.)	(AC)	(SQ. FT.)						
1	0.61 AC	26,706 SQ. FT.	0.53 AC	22,954 SQ. FT.	1R	5,033	503	886.66	31'-2"	RESIDENTIAL
2	0.40 AC	17,515 SQ. FT.	0.35 AC	15,115 SQ. FT.	2	4,819	459	886.98	31'-9"	RESIDENTIAL
3	0.40 AC	17,515 SQ. FT.	0.35 AC	15,115 SQ. FT.	3R	4,950	N/A	887.40	31'-10"	RESIDENTIAL
4	0.40 AC	17,515 SQ. FT.	0.35 AC	15,115 SQ. FT.	2R	4,819	459	887.97	31'-9"	RESIDENTIAL
5	0.40 AC	17,515 SQ. FT.	0.35 AC	15,115 SQ. FT.	4	5,136	419	888.22	31'-9"	RESIDENTIAL
6	0.40 AC	17,515 SQ. FT.	0.35 AC	15,115 SQ. FT.	1	5,033	503	888.47	31'-2"	RESIDENTIAL
7	0.40 AC	17,515 SQ. FT.	0.35 AC	15,115 SQ. FT.	3R	4,950	N/A	889.00	31'-10"	RESIDENTIAL
8	0.40 AC	17,515 SQ. FT.	0.35 AC	15,115 SQ. FT.	2	4,819	459	889.37	31'-9"	RESIDENTIAL
9	0.40 AC	17,515 SQ. FT.	0.35 AC	15,115 SQ. FT.	1	5,033	503	889.77	31'-2"	RESIDENTIAL
10	0.44 AC	19,300 SQ. FT.	0.34 AC	14,844 SQ. FT.	4	5,136	419	890.00	31'-9"	RESIDENTIAL
11	0.60 AC	26,319 SQ. FT.	0.52 AC	22,457 SQ. FT.	2	4,819	459	888.83	31'-9"	RESIDENTIAL
12	0.40 AC	17,556 SQ. FT.	0.35 AC	14,843 SQ. FT.	3	4,950	367	889.33	31'-10"	RESIDENTIAL
13	0.40 AC	17,556 SQ. FT.	0.35 AC	15,036 SQ. FT.	1	5,033	503	889.50	31'-2"	RESIDENTIAL
14	0.40 AC	17,556 SQ. FT.	0.35 AC	15,036 SQ. FT.	4	5,136	419	890.00	31'-9"	RESIDENTIAL
15	0.40 AC	17,556 SQ. FT.	0.35 AC	15,036 SQ. FT.	2R	4,819	459	891.00	31'-9"	RESIDENTIAL
16	0.43 AC	18,810 SQ. FT.	0.37 AC	16,110 SQ. FT.	3 ALT	4,965	367	891.00	29'-7"	RESIDENTIAL
17	0.40 AC	17,556 SQ. FT.	0.35 AC	15,036 SQ. FT.	4	5,136	419	891.00	31'-9"	RESIDENTIAL
18	0.40 AC	17,556 SQ. FT.	0.35 AC	15,036 SQ. FT.	2	4,819	459	891.25	31'-9"	RESIDENTIAL
19	0.40 AC	17,556 SQ. FT.	0.35 AC	15,036 SQ. FT.	3R	4,950	367	891.25	31'-10"	RESIDENTIAL
20	0.44 AC	18,976 SQ. FT.	0.37 AC	16,094 SQ. FT.	4	5,136	419	892.13	31'-9"	RESIDENTIAL
21	0.50 AC	21,730 SQ. FT.	0.47 AC	20,468 SQ. FT.	1R	5,033	503	892.38	31'-2"	RESIDENTIAL
22	1.75 AC	76,369 SQ. FT.	1.75 AC	76,369 SQ. FT.						NOT A PART
23	2.40 AC	104,465 SQ. FT.	2.40 AC	104,465 SQ. FT.						NOT A PART
PUBLIC STREET DEDICATION	0.78 AC	33,820 SQ. FT.								
TOTAL	14.07 AC	612,868 SQ. FT.	11.94 AC	519,936 SQ. FT.						

## NOTES:

- THOMAS GUIDE: 560-E3, 560-F2, 560-E2 AND 560-F3
- SEE TREE PLAN FOR TREES TO REMAIN AND TO BE REMOVED.
- DRAINAGE: CLOSE SYSTEM.
- RUNOFF FROM ROOFS AND DRIVEWAYS SHALL BE DIRECTED TO PRIVATE STREETS.
- DRAINAGE SWALES TO BE CONSTRUCTED AT PROPERTY LINES WHERE CONCENTRATED FLOWS ARE NOTED.
- SEWAGE DISPOSAL BY UNDERGROUND SEWER SYSTEM.
- SITE IS NOT LOCATED WITHIN A FLOOD ZONE.
- MAXIMUM BUILDING HEIGHT 32'
- A MINIMUM OF TWO PARKING SPACES PER SINGLE-FAMILY HOME ARE REQUIRED TO BE PROVIDED WITHIN A PRIVATE GARAGE.
- ALL WALLS TO INSTALL MASONRY, VINYL OR WROUGHT IRON FENCE. 8 FT MAX HEIGHT PER THE APPROVED LANDSCAPE PLANS.
- FOR LOTS 11 - 21 FRONT YARD IS DESIGNATED ALONG THE PRIVATE STREET.
- ALL COMBO WALLS SHOWN HEREON COMPLY WITH FIGURE 1 PER LADBS INFORMATION BULLETIN DOCUMENT NO.: P/BC 2020-002.
- PURSUANT TO LAMC 17.05 THE APPLICANT REQUESTS A MAXIMUM 20% DEVIATION IN THE REQUIRED FRONT AND SIDE YARDS.
- LOTS 11, 12, AND 13 WILL BE USED FOR MODEL HOME PURPOSES PURSUANT TO SUBSECTION O. OF SECTION 17.05 OF THE LAMC.
- THE PROJECT WILL UTILIZE THE RESIDENTIAL FAR BONUS PERMITTED IN THE RA ZONE

**REVISED**  
8:35 am, Jan 09, 2024

SCALE: 1" = 40'  
0 40 80 120





Channel Law Group, LLP

April 3, 2025

Supplemental Appeal Documentation - 5300 Oakdale Avenue; VTT-83927-HCA-1A, and related cases VTT-83927-HCA, ZA-2023-2170-ZAD-ZV-ZAA, ZA-2023-2170-ZAD-ZV-ZAA-1A, ENV-2020-6762-EIR (Program EIR); Council File No. 25-0310

# **ATTACHMENT D**



United States Department of the Interior  
National Park Service

# National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

**1. Name of Property**Historic name: Bothwell RanchOther names/site number: Rancho RinconadaName of related multiple property listing: N/A

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

**2. Location**Street & number: 5300 Oakdale AvenueCity or town: Los Angeles State: California County: Los AngelesNot For Publication: ☐ Vicinity: ☐**3. State/Federal Agency Certification**

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this \_\_\_ nomination \_\_\_ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property \_\_\_ meets \_\_\_ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

\_\_\_national \_\_\_statewide \_\_\_local

Applicable National Register Criteria:

\_\_\_A \_\_\_B \_\_\_C \_\_\_D

---

Signature of certifying official/Title:

Date

---

State or Federal agency/bureau or Tribal Government

In my opinion, the property \_\_\_ meets \_\_\_ does not meet the National Register criteria.

---

Signature of commenting official:

Date

---

Title:

State or Federal agency/bureau or Tribal Government

Bothwell Ranch  
Name of Property

Los Angeles, California  
County and State

---

#### 4. National Park Service Certification

I hereby certify that this property is:

- ☐ entered in the National Register  
☐ determined eligible for the National Register  
☐ determined not eligible for the National Register  
☐ removed from the National Register  
☐ other (explain:) \_\_\_\_\_

---

Signature of the Keeper

Date of Action

---

#### 5. Classification

##### Ownership of Property

(Check as many boxes as apply.)

- Private: ☒
- Public – Local ☐
- Public – State ☐
- Public – Federal ☐

##### Category of Property

(Check only **one** box.)

- Building(s) ☐
- District ☒
- Site ☐
- Structure ☐
- Object ☐

Bothwell Ranch  
Name of Property

Los Angeles, California  
County and State

**Number of Resources within Property**

(Do not include previously listed resources in the count)

Contributing	Noncontributing	
<u>5</u>	<u>0</u>	buildings
<u>1</u>	<u>0</u>	sites
<u>6</u>	<u>0</u>	structures
<u>0</u>	<u>0</u>	objects
<u>12</u>	<u>0</u>	Total

Number of contributing resources previously listed in the National Register 0

**6. Function or Use**

**Historic Functions**

(Enter categories from instructions.)

AGRICULTURE/SUBSISTENCE: agricultural field

DOMESTIC: single dwelling

OTHER: vintage vehicle collection storage and display

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Current Functions**

(Enter categories from instructions.)

VACANT/NOT IN USE

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Bothwell Ranch  
Name of Property

Los Angeles, California  
County and State

---

## 7. Description

### Architectural Classification

(Enter categories from instructions.)

OTHER: Minimal Traditional Style

---

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---

**Materials:** (enter categories from instructions.)

Principal exterior materials of the property: wood, steel

### Narrative Description

(Describe the historic and current physical appearance and condition of the property. Describe contributing and noncontributing resources if applicable. Begin with a **summary paragraph** that briefly describes the general characteristics of the property, such as its location, type, style, method of construction, setting, size, and significant features. Indicate whether the property has historic integrity.)

---

### Summary Paragraph

Bothwell Ranch is located in the Tarzana<sup>1</sup> neighborhood of Los Angeles in the southwest San Fernando Valley. It comprises four parcels totaling 13.8 acres within the surrounding residential community and is less than a mile south of Ventura Boulevard and the 101 Freeway. Altogether, Bothwell Ranch consists of one contributing site (Citrus Grove), five contributing buildings (Main House, Multi-Purpose Building, two Two-Story Garages, and Train Station), and six contributing structures (Train Shed and five Storage Sheds). The Citrus Grove primarily encompasses much of the western portion of Bothwell Ranch, with most of the buildings and structures situated to the east. Character-defining features of the property include the primary entrance from Oakdale Avenue along a central east-west gravel driveway; layout of regularly spaced rows of citrus trees planted in a north-south orientation; Minimal Traditional-style Main House situated within the Citrus Grove just south of the east-west driveway; and wood and metal cladding, original wood windows, and hip, gable, and shed roof forms on all contributing buildings and structures. Even with the replacement of older citrus trees with newer ones, Bothwell Ranch retains historic site and architectural integrity.

---

<sup>1</sup> Some documentation such as historic newspaper articles place the property in the adjacent neighborhood of Woodland Hills. According to the *Los Angeles Times* Mapping LA neighborhood boundary map, the border between Woodland Hills and Tarzana lies along Oakdale Avenue, to the immediate west of the Bothwell Ranch.

Bothwell Ranch  
Name of Property

Los Angeles, California  
County and State

---

## Narrative Description

### Setting and Site

Bothwell Ranch is bound by Oakdale Avenue to the west, Collier Street to the south, and adjacent single-family residences to the north and east. Corbin Avenue terminates at the north and south of the property before continuing at the other side. An allée of tall palms lines Oakdale adjacent to the property and a wire fence stretches along the property boundary on both Oakdale and Collier. The primary entrance to Bothwell Ranch is accessed through recessed wrought iron gates at Oakdale. Another entrance to the property is located near the terminus of Corbin at the northeast through wood gates leading to a curving gravel driveway.

The largest of the four parcels is rectangular, 9.8 acres, and includes the central 1934 Main House and the majority of the Citrus Grove. A central east-west gravel driveway bisects the parcel and is north of the Main House. A two-story Multi-Purpose Building that had been used for storage and employee housing is located at the northeast portion of this parcel. The other parcels to the east are all under two acres each and contain additional fruit trees as well as various sheds and garages used in agricultural operations and to house Lindley F. Bothwell's extensive vintage vehicle collection. These include two Two-Story Garages, a Train Station, a Train Shed, and several Storage Sheds.

Because access to the property was not available, the following description is based on site visit from the public right-of-way, available aerials and air photos, and recent documentation including the 2019 Historic-Cultural Monument nomination prepared by City of Los Angeles Office of Historic Resources staff and a 2024 Historic Resource Assessment Report of the Bothwell Ranch prepared by Teresa Grimes. No historic building permits were found recorded for the property.

### Citrus Grove (c. 1920s, replanted 1980-1985; One Contributing Site)

The Citrus Grove is predominantly concentrated on the western portion of Bothwell Ranch and consists of regularly spaced rows of citrus trees planted in a north-south orientation. The trees continue to bear fruit, though patches of dry branches are evident. The land is generally flat with a slight rise to the east and there is an east-west gravel driveway from Oakdale that bisects the Citrus Grove down the center into roughly two equal halves. The gravel driveway appears to also be lined along the south with a single east-west row of citrus trees. The Main House is located within the Citrus Grove, just south of the center of the driveway. Additional citrus trees are planted in the eastern portion of Bothwell Ranch, though are less concentrated and may have served primarily an aesthetic role lining the driveway from Corbin.

Bothwell Ranch

Name of Property

Los Angeles, California

County and State

### **Main House (1934; One Contributing Building)**

The Main House is a one-to-two-story, wood-framed, single-family residence designed in a Minimal Traditional Ranch style with a roughly U-shaped plan. It is located near the center of the Citrus Grove, just south of the east-west gravel driveway, and is clad in horizontal wood siding. From its primary north elevation, the Main House is delineated by a one-story wing with gable roof to the east and a two-story wing with hip roof to the west. The roof is clad in composition shingles and there are exposed rafter tails. The one-story east portion features a partial width, recessed, brick-paved porch containing the main entrance to the residence. The two-story west portion has an attached covered balcony at the second floor. At the rear (south) elevation, the one-story east portion turns and extends to the south, creating an open courtyard between this extension and the two-story west portion, forming the U-shaped plan.

Fenestration at the Main House generally consists of paired multi-light wood casement windows at all elevations, though some original windows have been replaced with vinyl and aluminum sliders. While the front door is a single-panel with a metal screen, other doors at the rear of the Main House and at the second-floor balcony consist of single- or multi-light wood French doors. A brick chimney is situated at the east elevation of the two-story west portion.

A wood picket fence separates the front yard of the Main House from the driveway, while a chain link fence helps enclose the side and rear yards. Brick steps and a brick path lead to the front patio; additional brick paths, both curved and straight, are present in the side and rear yards. The surrounding landscape generally consists of a lawn at the front yard and various shrubs, grasses, and other flowering plants. A large oak tree grows in the rear yard south of the Main House, potentially helping to provide privacy from Collier.

### **Multi-Purpose Building (1952-1964; One Contributing Building)**

A two-story Multi-Purpose Building with first-floor car storage and workshop and second-floor office and caretaker's quarters is located at the northeast end of the Citrus Grove. Based on available historic aerials, it appears to have been constructed in several phases with additions between 1952 and 1964. The Multi-Purpose Building is wood-framed and roughly rectangular in plan, though heights and setbacks vary at the primary east elevation. There are both gable and shed roofs with exposed rafter tails. The exterior is primarily sheathed with wood board-and-batten siding though a one-story portion at the north is clad in corrugated sheet metal. There is an irregular fenestration pattern consisting of various rectangular window styles that include wood awning and aluminum sliding sash.

### **Two-Story Garages (c. 1940 and 1947; Two Contributing Buildings)**

Part of Bothwell's large collection of vintage vehicles was housed in two two-story garages that utilized ramps to access the second floor. One of the two-story garages (Two-Story Garage A) is located directly east of the Citrus Grove and was constructed by 1940 based on available historic aerials. It is rectangular in plan with a north-south orientation, is wood-framed, and has a

Bothwell Ranch  
Name of Property

Los Angeles, California  
County and State

corrugated sheet metal gable roof. Much of the exterior is covered in metal panels, though some board-and-batten wood siding is visible at the second floor of the north elevation. Sliding doors providing access to the first floor are located on the primary east elevation and north elevation. A wood ramp is located on the south elevation providing vehicle access to the second floor through sliding doors. Rectangular single-pane windows are located at the second floor.

Another two-story garage (Two-Story Garage B) is located at the east end of Bothwell Ranch with its primary west elevation facing a large oblong gravel lot. According to assessor records, the building was constructed in 1947, consistent with a historic aerial from that year showing the garage. It is rectangular in plan with a north-south orientation, is wood-framed, and has a corrugated sheet metal gable roof. The first floor contains large, paired swing garage doors made of wood, though non-original metal panels were applied to the exterior. The second floor has vertical corrugated sheet metal cladding with some visible paint deterioration. A shadow in the center of the second-floor elevation reveals where a red Mobil Oil Corporation Pegasus sign used to hang; the Pegasus sign appears to have been relocated to the Multi-Purpose Building. There are four single-pane rectangular windows situated evenly at the top of the second floor, just below the roofline. The original multi-pane windows have been replaced, but the new windows appear to be in the original fenestration openings. Ramps that provide vehicle access to the second floor are located at the north and south elevations.

### **Train Station (c. 1977; One Contributing Building)**

The Train Station is located to the east of the Multi-Purpose Building and the west of the Train Shed. Based on available historic aerials, it appears to have been constructed c. 1977, around the same time as the Train Shed. Though T-shaped in plan, the Train Station consists of a roughly rectangular building with an intersecting gable roof with exposed rafters extending above open patios to the north and west. The Train Station is wood-framed, has a composition roof, and the building portion is clad in board-and-batten wood siding. The primary entrance into the building is located at the north elevation beneath the overhanging roof and consists of a paneled wood door flanked by two sliding windows with wood trim. Wood hung windows are located at all sides of the east extension. A sign at the west elevation reads "Rinconada Station" between two fixed single-pane windows. Below the north roof overhang, there is wood bench seating. Vehicles are parked below the west roof overhang.

### **Train Shed (c. 1977; One Contributing Structure)**

The Train Shed is curved in plan and located to the immediate east of the Train Station. Based on available historic aerials, it appears to have been constructed c. 1977, around the same time as the Train Station. It is open on all sides, has a wood-frame construction with visible beams at the ceiling, and a corrugated sheet metal roof. The train shed housed vintage locomotives and streetcars and there are remnant train tracks set in gravel that curve with the shape of the shed.



Bothwell Ranch  
Name of Property

Los Angeles, California  
County and State

### **Storage Sheds (c. 1964-1972; Five Contributing Structures)**

A cluster of five rectangular Storage Sheds that housed part of Bothwell's vehicle collection is located near the southeast corner of Bothwell Ranch. The westernmost and easternmost Storage Sheds are directly adjacent to the south property line while the other three Storage Sheds in-between are set back further north. All have their primary entrance at the north elevation. Two of the Storage Sheds are Quonset huts with a curved corrugated sheet metal roof and corrugated siding. The other three Storage Sheds have corrugated sheet metal gable roofs with corrugated and flat metal panel siding. The Storage Sheds with gable roofs are wood-framed and have exposed rafter tails. One Storage Shed with a gable roof has a flat roof extension to the east creating an open covered patio or carport held up by round thick wood columns. The two Quonset huts are obscured at the north by large, unattached doors.

### **Integrity**

#### *Location*

Bothwell Ranch has not moved from its original location and all contributing buildings and structures are still where they were initially constructed. Bothwell Ranch retains integrity of location.

#### *Design*

The overall design of Bothwell Ranch still appears intact based on historic aerials and other documentation. The Citrus Grove continues to be north-south rows of regularly spaced, planted citrus trees as it was historically and the buildings and structures on the property continue to reflect their historic uses and appearance. Character-defining features such as the primary entrance from Oakdale Avenue along a central east-west gravel driveway; layout of regularly spaced rows of citrus trees planted in a north-south orientation; Minimal Traditional-style Main House situated within the Citrus Grove just south of the east-west driveway; and wood and metal cladding, original wood windows, and hip, gable, and shed roof forms on all contributing buildings and structures are still intact. Bothwell Ranch retains integrity of design.

#### *Setting*

Encroaching development over time has changed the original immediate surroundings of Bothwell Ranch, which primarily consisted of additional citrus groves and other agricultural uses. Today, Bothwell Ranch is surrounded by single-family residences and some of its original larger setting has diminished. However, the residential growth occurred while Bothwell Ranch was still a functional commercial citrus grove, beginning during the period of significance and telling the story of the evolving environment of the San Fernando Valley from agricultural to suburban development. Bothwell Ranch thus retains integrity of setting.

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### *Materials*

Though the majority of the Citrus Grove was replaced in the 1980s after the trees had met their useful lifespan,<sup>2</sup> the citrus trees were replaced with other citrus trees in the same pattern of north-south rows shown in historic aerials. Buildings and structures on the property still retain original wood and metal cladding. Where some windows have been changed, such as at Two-Story Garage B, they appear to still maintain original fenestration openings. Bothwell Ranch retains integrity of materials.

### *Workmanship*

While Bothwell Ranch is not significant for its architecture, there is evidence of workmanship in the construction of the buildings and structures on the property, such as the Two-Story Garages with ramps leading to the second floor and curved-in-plan Train Shed. Much of the original design and materials of these buildings do not appear to have significantly changed, so original workmanship is still apparent. Bothwell Ranch retains integrity of workmanship.

### *Feeling*

Because of the extant citrus trees and contributing buildings and structures, Bothwell Ranch continues to maintain its feeling as a historic citrus grove that had been in operation since the 1920s. Bothwell Ranch retains integrity of feeling.

### *Association*

Bothwell Ranch continues to be able to convey its association with the historic citrus industry in Los Angeles and the San Fernando Valley and with owner Lindley F. Bothwell. The property still retains a fruit-bearing citrus grove that had been commercially farmed and several buildings and structures that both interpret the agricultural use as well as were used to house Bothwell's noted vintage vehicle collection. Bothwell Ranch retains integrity of association.

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<sup>2</sup> The average lifespan of a citrus tree is 50 years. US Citrus Nursery, "Citrus Tree Lifespan: What's the Average Life Expectancy of a Citrus Tree," June 8, 2019. <https://uscitrusnursery.com/blogs/citrus-simplified/citrus-tree-lifespan-whats-the-average-life-expectancy-of-a-citrus-tree> (accessed October 25, 2024).

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## 8. Statement of Significance

### Applicable National Register Criteria

(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- ☒ A. Property is associated with events that have made a significant contribution to the broad patterns of our history.
- ☒ B. Property is associated with the lives of persons significant in our past.
- ☐ C. Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- ☐ D. Property has yielded, or is likely to yield, information important in prehistory or history.

### Criteria Considerations

(Mark "x" in all the boxes that apply.)

- ☐ A. Owned by a religious institution or used for religious purposes
- ☐ B. Removed from its original location
- ☐ C. A birthplace or grave
- ☐ D. A cemetery
- ☐ E. A reconstructed building, object, or structure
- ☐ F. A commemorative property
- ☒ G. Less than 50 years old or achieving significance within the past 50 years

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**Areas of Significance**

(Enter categories from instructions.)

AGRICULTURE

ENTERTAINMENT

RECREATION

\_\_\_\_\_

\_\_\_\_\_

**Period of Significance**

1926-2016

\_\_\_\_\_

\_\_\_\_\_

**Significant Dates**

1926

2016

\_\_\_\_\_

**Significant Person**

(Complete only if Criterion B is marked above.)

Bothwell, Lindley Fowler

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Cultural Affiliation**

N/A

\_\_\_\_\_

\_\_\_\_\_

**Architect/Builder**

None Identified

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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**Statement of Significance Summary Paragraph** (Provide a summary paragraph that includes level of significance, applicable criteria, justification for the period of significance, and any applicable criteria considerations.)

Bothwell Ranch is eligible for listing in the National Register of Historic Places at the local level of significance under Criterion A in the area of Agriculture for its association with the once-dominant citrus industry in Los Angeles as the last operating commercial orange grove in the San Fernando Valley, Criterion A in the area of Entertainment for its association with the entertainment industry as the location of the first live outdoor dramatic color television broadcast, and Criterion B in the area of Recreation for its association with prominent rancher, yell king, and vintage vehicle collector Lindley F. Bothwell. The period of significance is 1926, when Bothwell began managing the property as a commercial orange grove, to 2016, when operations at the grove ceased following the death of Bothwell's widow, Ann. Though the significance of Bothwell Ranch stretches back over 50 years to 1926, the property satisfies Criteria Consideration G as the year 2016 provides a clear cut-off date encompassing the extent of Bothwell Ranch's role as the last commercial citrus grove in the San Fernando Valley, operated continuously under the Bothwells for 90 years.

**Narrative Statement of Significance** (Provide at least **one** paragraph for each area of significance.)

### **Criterion A: Agriculture; Entertainment**

#### *Citrus Production in Los Angeles and the San Fernando Valley*

Oranges were first introduced to the greater Los Angeles region around 1804 at Mission San Gabriel, with "Mission trees helping to form the basis of groves of several Los Angeles growers."<sup>3</sup> In 1834, pioneer William Wolfskill would be the first to lay out an orange grove in the city, planting 70 acres near present day Downtown Los Angeles.<sup>4</sup> Through the rest of the 19<sup>th</sup> century, the citrus industry would continue to expand in Los Angeles County, growing from about 30,000 trees in 1870 to more than one million in 1890.<sup>5</sup>

The San Fernando Valley, not yet incorporated into the City of Los Angeles, was sparsely populated by the turn of the 20<sup>th</sup> century. Dry farming practices were common and the production of low-water crops such as wheat dominated the area as water from the Los Angeles River was off limits due to the exclusive rights of Los Angeles.<sup>6</sup> The 1910s brought major developmental changes to the San Fernando Valley "in anticipation of the construction of the

<sup>3</sup> LSA Associates, Inc., "Los Angeles Citywide Historic Context Statement, Context: Industrial Development, 1850-1980," SurveyLA Los Angeles Historic Resources Survey, September 2011, revised February 2018, 20.

<sup>4</sup> Ibid.

<sup>5</sup> Jared Farmer, *Trees in Paradise: A California History*, New York and London: W.W. Norton & Company, 2013, 249.

<sup>6</sup> LSA Associates, Inc., 17.

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Owens Valley aqueduct in 1913, bringing water to Los Angeles via the San Fernando Valley, and the annexation of the area into the city of Los Angeles in 1915.”<sup>7</sup>

The introduction of and access to water from the aqueduct provided the conditions in the San Fernando Valley in which “fields of tomatoes, grapes, and lima beans thrived, and orchards of walnuts, oranges and lemons flourished.”<sup>8</sup> Farms now had a “reliable and controlled water source to irrigate its crops year-round,” allowing production to grow significantly in the years that followed.<sup>9</sup> The San Fernando Valley alone saw “acreage irrigated through artificial means [grow] from about 3,000 acres in 1915 to more than 70,000 acres within ten years, with crops including walnuts, oranges, lemons, and sugar beets leading in production.”<sup>10</sup>

Citrus in particular became an important part of Los Angeles commercial identity in the early 1920s as Los Angeles County alone devoted over 92,000 acres of land to its production, more than a third of all citrus land in the state.<sup>11</sup> By 1922, “Los Angeles County led all other U.S. counties in the value of its agricultural products, and citrus was Los Angeles’ most important and long-lived cash crop for export.”<sup>12</sup> The San Fernando Valley at the time had an estimated 750,000 citrus trees.<sup>13</sup> In his book *Trees in Paradise: A California History*, author and historian Jared Farmer writes:

Imagine the scene, circa 1920: from the Oxnard Plain to the San Fernando Valley, across the wide San Gabriel and San Bernardino valleys, down the gentle coastal plain of Orange County, trees festoon the landscape... This was the Orange Empire.<sup>14</sup>

By the 1930s, citrus had emerged as California’s principal agricultural product.<sup>15</sup> Oranges became not just a product for export, but a symbol of the bright and sunny west. They were not only a part of the region’s commercial identity but were a part of its cultural identity as well, with marketing of byproducts such as juices and oils further spurring citrus production. Cooperative associations helping to organize and manage citrus production across the many groves grew into an influential industry group where “by 1939, 85 percent of citrus produced in California and Arizona was controlled by cooperative associations, the largest of which was Sunkist, which managed 74 percent of total citrus production.”<sup>16</sup> Shipments of oranges from Southern California grew substantially from one million boxes in 1887 to 65.5 million boxes in the early 1940s.<sup>17</sup>

<sup>7</sup> Architectural Resources Group, “Historic Resources Survey Report: Encino-Tarzana Community Plan Area,” SurveyLA Los Angeles Historic Resources Survey, February 2013, 9.

<sup>8</sup> Kevin Roderick, *The San Fernando Valley: America’s Suburb*, Los Angeles, CA: Los Angeles Times Books, 2001, 71.

<sup>9</sup> LSA Associates, Inc., 19.

<sup>10</sup> Ibid.

<sup>11</sup> Anthea Marie Hartig, “Citrus Growers and the Construction of the Southern California Landscape, 1880-1940,” PhD. Dissertation, University of California, Riverside, December 2001, 61.

<sup>12</sup> LSA Associates, Inc., 20.

<sup>13</sup> Roderick, 71.

<sup>14</sup> Farmer, 278.

<sup>15</sup> California Department of Transportation, “A Historical Context and Archaeological Research Design for Agricultural Properties in California,” 2007.

<sup>16</sup> LSA Associates, Inc., 21.

<sup>17</sup> Hartig, 62.

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While the first few decades of the 20th century saw much prosperity in the commercial production of citrus in the region, in the years following the end of World War II the citrus industry in Los Angeles began to decline as post-war development encroached on available land in the San Fernando Valley. As described by Farmer, “the collapse of the pioneer citrus landscape occurred first in Los Angeles County, then in Orange County.”<sup>18</sup> Large residential subdivisions were constructed in response to higher demand, resulting in skyrocketing land values.<sup>19</sup> The prices of oranges were not keeping up with rising land costs and property taxes (with necessary supplies such as heating oils and oil sprays also becoming more expensive) and thus many ranchers and farmers were forced to sell or downsize their groves.<sup>20</sup> In addition, there was now added competition for water resources from the growing cities and neighborhoods in the area. In the 1980s, the Los Angeles Department of Water and Power “discontinued its bargain agricultural rate for San Fernando Valley farms,” resulting in another blow to local ranches.<sup>21</sup>

Suburban growth in the San Fernando Valley was further bolstered by the openings of the 101 and 405 freeways in the 1960s, expanding the connections between the region and the Westside and Downtown Los Angeles.<sup>22</sup> As residential uses began to surround existing ranches, additional protocols were being imposed to regulate typical agricultural practices like smudging and spraying. Los Angeles was seeing a shift towards aerospace and other defense-related industries, and “children and grandchildren of established growers generally did not take up horticulture; they wanted to inherit citrus wealth, not the citrus themselves.”<sup>23</sup>

California would lose its status as the leader in the national citrus economy, going from a record high of 350,000 acres dedicated to citrus production in 1945 to a historic low of 250,000 acres only 11 years later.<sup>24</sup> Though the industry dwindled, it did not perish and “by inflating land prices around Los Angeles, developers, realtors, and home buyers facilitated a major transfer of agricultural wealth into undercapitalized parts of the state,” particularly in the Central Valley region.<sup>25</sup>

According to Farmer, “by the late 1980s, the orchards of the San Fernando Valley could be counted on one hand.”<sup>26</sup> At the turn of the 21<sup>st</sup> century, “orange groves dating from the heyday of citrus [remained] on the south edge of the Cal State University Northridge [CSUN] campus, at Orcutt Ranch Park in West Hills, and at the working Bothwell Ranch in Woodland Hills.”<sup>27</sup> While orange groves at CSUN and Orcutt Ranch are still extant, neither were commercially

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<sup>18</sup> Farmer, 311.

<sup>19</sup> Architectural Resources Group, 10-11.

<sup>20</sup> Farmer, 308.

<sup>21</sup> James Ricci, “Vestige of Idyllic Life Still Bears Fruit,” *Los Angeles Times*, August 29, 1998: 99, 102.

<sup>22</sup> Architectural Resources Group, 10-11.

<sup>23</sup> Farmer, 307-308.

<sup>24</sup> Ibid, 311.

<sup>25</sup> Ibid, 314.

<sup>26</sup> Ibid, 317.

<sup>27</sup> Roderick, 193.



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farmed with the fruit typically “harvested by the public on a pick-your-own basis, or by nonprofit community organizations.”<sup>28</sup>

As the last commercial orange grove in the San Fernando Valley, the *Los Angeles Times* recognized the importance of Bothwell Ranch in 1998, lamenting that “two-thirds of a century ago, citrus groves covered 15,000 acres of the Valley,” but “the robust Valley orange industry...has dwindled to the 80-year-old widow [Ann Bothwell] and her 14-acre Bothwell Ranch south of Ventura Boulevard, the final one-thousandth of the once grant totality.”<sup>29</sup> With the closing of Bothwell Ranch in 2016, there are no longer any active commercial orange groves in the San Fernando Valley.

*Bothwell Ranch: The Last Commercial Orange Grove in the San Fernando Valley*

Lindley Fowler Bothwell received a degree from Oregon Agricultural College (now part of Oregon State University), specializing in the study of soils.<sup>30</sup> Even while maintaining his own orange grove in the San Fernando Valley, Bothwell “developed special soils in his bacteriological lab and [had] become an important person in the community” “providing pruning, spraying, and other technical assistance to some 40 ranches from San Francisco to the Mexican border.”<sup>31, 32</sup> Bothwell was recognized for his involvement in “scientific farming” and was a member of the Society of Soil Scientists and the American Society of Agronomy.<sup>33</sup>

On March 16, 1926, Bothwell engaged in a notarized agreement with Henry R. Bristol for ownership of the “Northerly half of Lot Forty (40) of Tract No. 2605” for a sum of \$12,500.<sup>34</sup> On the same day, Bothwell’s parents, Samuel F. Bothwell and Myra L. Bothwell, also entered in a notarized agreement with Bristol for the “Southerly half of Lot Forty-one (41) of Tract No. 2605.”<sup>35</sup> These two properties combined would become Bothwell Ranch. The notarized agreement stated that “the crop now growing upon the trees on said land shall pass to and belong to the buyer without further or other consideration being paid therefor, and said buyer shall assume the care of said crop from the time of the execution and delivery of this agreement.”<sup>36</sup>

In 1979, the *Los Angeles Times* published an article by Stephen A. Bristol discussing his grandfather Henry R. Bristol’s previous ownership of the Bothwell property, stating that “in 1914, my grandfather bought 82 acres with about one fourth mile frontage on Ventura Blvd” and “grandfather and my father, in a partnership, planted 82 acres of orange trees shortly after buying

<sup>28</sup> James Ricci, “Vestige of Idyllic Life Still Bears Fruit,” *Los Angeles Times*, August 29, 1998: 99, 102.

<sup>29</sup> Ibid.

<sup>30</sup> Mary Jane Strickland, “Farming Gives Way to Urbanization in Valley,” *Los Angeles Times*, November 26, 1978: 617.

<sup>31</sup> “Scientist’s Hobby Paying So Well He Can Pursue His Work for Fun,” *Newark Star Ledger*, October 7, 1946: 7.

<sup>32</sup> Mary Jane Strickland, “Farming Gives Way to Urbanization in Valley,” *Los Angeles Times*, November 26, 1978: 617.

<sup>33</sup> George P. Edmonston Jr., “OAC’s king of the stunt card,” *Corvallis Gazette Times*, October 25, 2002: 11, 15.

<sup>34</sup> Notarized agreement between H.R. Bristol and Lindley F. Bothwell, March 16, 1926, Accessed via the real estate records of the Los Angeles County Registrar-Recorder/County Clerk.

<sup>35</sup> Notarized agreement between H.R. Bristol and Samuel F. Bothwell and Myra L. Bothwell, March 16, 1926, Accessed via the real estate records of the Los Angeles County Registrar-Recorder/County Clerk.

<sup>36</sup> Notarized agreement between H.R. Bristol and Lindley F. Bothwell, March 16, 1926, Accessed via the real estate records of the Los Angeles County Registrar-Recorder/County Clerk.

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the property.”<sup>37</sup> Bristol continues that his father and grandfather tended the ranch until 1924, subdividing in 1926 when about 20 or 30 acres of the ranch was sold to Bothwell. This is also supported by articles where Bothwell himself is interviewed stating he “acquired 20 acres of orange trees in 1926 in Woodland Hills.”<sup>38</sup>

Bothwell appears to have been very active in the citrus industry in the San Fernando Valley, being elected as a director of the San Fernando Orange Heights Association in 1936.<sup>39</sup> At the time, the association was handling the largest packing of citrus fruit in its history. Bothwell was recorded as an attendee at several meetings held by the Agricultural Extension Service on topics such as citrus replant care and pest control.<sup>40, 41</sup> In 1939, Bothwell was described as the “agricultural adviser to film stars in the San Fernando Valley,” likely due to connections made renting his collection of vintage automobiles and vehicles to local film and television studios.<sup>42</sup> One of his clients as a “Valley citrus expert” was Hearst Syndicate executive John Black, who Bothwell advised in planting citrus on acreage adjoining the landscaped gardens of Black’s estate.<sup>43</sup> By 1943, Bothwell’s “citrus empire” had “grown to 34 ranches, which he either owned or managed” and he was “considered by the U.S. Department of Agriculture to be one of the nation’s top-10 citrus farmers.”<sup>44</sup>

In 1949, *California Farmer* magazine included a short profile on Bothwell and his San Fernando Valley grove:

Recently it was our good fortune to hear about a Valencia [orange] grove in the San Fernando valley which has consistently produced heavy crops of large-sized fruit. It was asserted that this grove had the largest Valencias in the valley last year, with 70 per cent of the fruit being of 220 packing size and larger.

Considering that the valley as a whole had about the smallest summer oranges of any grown in the state last year, we decided to investigate. The 29-year old Valencia grove, located in Woodlands [sic] Hills, Los Angeles county, is owned by Lindley Bothwell, who handles cultural operations in about 1000 acres of citrus in Southern California.

He is almost a fanatic on the subject of irrigation and is convinced that most growers fail to put enough water onto their trees. Moreover, he is certain that a lack of water is one of the most important reasons for small sizes.

Bothwell irrigates his home orchard with what is now considered an old-fashioned method – the flood system. Actually it is a modified type of flooding because furrows are

<sup>37</sup> Stephen A. Bristol, “Spec House Story Stirs Memories,” *Los Angeles Times*, April 1, 1979: 154.

<sup>38</sup> Mary Jane Strickland, “Farming Gives Way to Urbanization in Valley,” *Los Angeles Times*, November 26, 1978: 617.

<sup>39</sup> “\$588,859 Return Sets Citrus Mark,” *Los Angeles Evening Citizen News*, January 15, 1936: 17.

<sup>40</sup> “Valley Meets Explain Citrus Replant Care,” *Los Angeles Evening Citizen News*, May 31, 1946: 6.

<sup>41</sup> “Citrus Pests,” *Van Nuys News and Valley Green Sheet*, August 8, 1946: 6.

<sup>42</sup> “Behind the Makeup,” *San Francisco Examiner*, February 16, 1939: 18.

<sup>43</sup> “New Resident Will Make Extensive Improvement,” *Van Nuys News and Valley Green Sheet*, June 30, 1938: 1.

<sup>44</sup> George P. Edmonston Jr., “OAC’s king of the stunt card,” *Corvallis Gazette Times*, October 25, 2002: 11, 15.

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used too, but the end result is that the entire area surrounding the trees is almost covered with water at each irrigation.<sup>45</sup>

Though Bothwell wholesaled some of his fruit, he used much of what he had grown “in a fruit pack business he’s had since the 1930s.”<sup>46</sup> Advertisements printed across the country in 1951 highlighted packed gift boxes of fruit delivered from “Lindley Bothwell Ranches,”<sup>47</sup> also emphasizing that Bothwell “not only grows the finest oranges, but marvelous avocados as well.”<sup>48</sup> At the time, a box of about three dozen California seedless oranges from Bothwell Ranch cost \$4.75.

Bothwell’s packing operations were again highlighted in a 1956 *Los Angeles Times* article that described the orange tree as a “California Christmas tree” and noted that “veteran citrus grower, Lindley F. Bothwell, is one of those growers who are busy right now packing their fragrant crops into gaily-wrapped Christmas packages to be sold all over Southern California.”<sup>49</sup> Bothwell was described as “a man who knows his business” after working in the grove for 31 years and “operating so profitably that [he] is able to ignore the offers of land-hungry subdividers.”<sup>50</sup> The article attributed Bothwell’s success to his agricultural knowledge:

Long ago he determined that the Valencia orange, when grown in the soil and climate of the San Fernando Valley, stayed on the trees longer than other oranges. This enabled its grower to hit the late market – the Christmas market. By developing a year-round operation, he solved many of the problems which plague and often defeat other farmers who must work soil on the fringes of expanding cities. While other citrus growers have trouble getting labor to tend the trees and pick the fruit, Bothwell has a permanent crew of loyal men.<sup>51</sup>

By 1972, Bothwell Ranch was already being referred to as “the Valley’s oldest remaining citrus grove.”<sup>52</sup> Much of the surrounding land that was part of the larger pre-subdivided orange grove had already been turned into housing tracts while Bothwell continued to tend his trees, reminiscing that in the 1920s “there were about 4,000 acres in oranges” in the San Fernando Valley.<sup>53</sup> Bothwell died in 1986, but his wife Ann continued to manage the citrus production at Bothwell Ranch.

<sup>45</sup> Bill Allen, “Culled from the County’s Fields and Groves,” *Santa Ana Register*, May 26, 1949: 30.

<sup>46</sup> Mary Jane Strickland, “Farming Gives Way to Urbanization in Valley,” *Los Angeles Times*, November 26, 1978: 617.

<sup>47</sup> Bothwell also referred to his property as Rancho Rinconada, with the name appearing in newspapers as early as 1949 through 1972. According to Cambridge Spanish-English Dictionary, *rinconada* translates to “corner plot.” The property is more well-known today as Bothwell Ranch.

<sup>48</sup> “Advertisement: Out West with The Westerners,” *Yellowstone News*, November 15, 1951: 8.

<sup>49</sup> “Santa’s Workers Sweat in Valley Orange Groves,” *Los Angeles Times*, December 9, 1956: 164.

<sup>50</sup> *Ibid.*

<sup>51</sup> *Ibid.*

<sup>52</sup> Jeffrey D. Hansen, “Farmers Out Lighting Their Smudge Pots,” *Los Angeles Times*, December 12, 1972: 19.

<sup>53</sup> Mary Jane Strickland, “Farming Gives Way to Urbanization in Valley,” *Los Angeles Times*, November 26, 1978: 617.

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The *Los Angeles Times* published another profile on the property in 1998, again acknowledging “what is believed to be the last commercial orange grove in the San Fernando Valley.”<sup>54</sup> It described the ranch as “a pristine place of weedless rows of Valencia orange trees, tidily graveled roads and shining, grove-green outbuildings trimmed in white. In aspect and feel, it is completely aberrant to the upscale suburban Woodland Hills neighborhood that has surrounded it.”<sup>55</sup> Ann died in 2016 and the agricultural operations ceased. Before her death, she had lamented, “It brings me up short when I think of it every once in a while, that [Bothwell Ranch] is that last of its kind. But somebody has to be the first, and somebody has to be the last.”<sup>56</sup>

Bothwell Ranch was sold to developer Borstein Enterprises in 2022.<sup>57</sup> In 2019, City of Los Angeles Office of Historic Resources staff prepared a Historic-Cultural Monument nomination for Bothwell Ranch. Though the nomination received unanimous support by the Cultural Heritage Commission, the nomination ultimately failed to receive approval of the City Council. A project to replace much of the orange grove with luxury housing while retaining 30% to be donated to the Mountains Recreation and Conservation Authority is currently proposed.

### *The First Live Outdoor Dramatic Color Television Broadcast*

While Bothwell Ranch represents an important part of the agricultural history of Los Angeles and the San Fernando Valley, it also represents an important part of the entertainment industry in general as the location of the first live outdoor dramatic color television broadcast. During the 1950s, color television was still a novelty and a luxury, and “even after the color standard was adopted by the Federal Communications Commission (FCC) in 1953, it would be more than a decade before color television became widely available in the United States.”<sup>58</sup> Advancements in the technology were still developing, with the first live nationwide color television broadcast only happening in 1954 at the annual Tournament of Roses Parade in Pasadena.<sup>59</sup>

To encourage the public to transition from black and white televisions to the more expensive ones in color, NBC produced both “lavish spectacles” and the “daytime minimalist theatrical productions of Matinee Theatre,” an anthology drama series that aired daily from 1955 to 1958.<sup>60</sup> Stories and actors changed with each episode, though like other programs at the time, they were filmed in an indoor studio with constructed sets. In the 51<sup>st</sup> episode of its first season, this practice changed in an experiment that would serve as a precursor to future televised programs.

<sup>54</sup> James Ricci, “Vestige of Idyllic Life Still Bears Fruit,” *Los Angeles Times*, August 29, 1998: 99, 102.

<sup>55</sup> Ibid.

<sup>56</sup> Ibid.

<sup>57</sup> Jim Carlton, “The Last Working Orange Grove in the San Fernando Valley to Give Way to Homes,” *The Wall Street Journal*, December 27, 2023. <https://www.wsj.com/us-news/the-last-working-orange-grove-in-the-san-fernando-valley-to-give-way-to-homes-b0a0d191> (accessed October 16, 2024).

<sup>58</sup> Susan Murray, *Bright Signals: A History of Color Television*, Duke University Press: Durham and London, 2008, 1.

<sup>59</sup> Michael Lisicky, “Color TV Debuted At The 1954 Rose Parade, Thanks to RCS, NBC And Woolworth,” *Forbes*, January 1, 2021. <https://www.forbes.com/sites/michaellisicky/2021/01/01/color-tv-debuted-at-the-1954-rose-parade-thanks-to-rca-nbc-and-woolworth/> (accessed October 21, 2024).

<sup>60</sup> William Hawes, *Filmed Television Drama, 1952-1958*, Jefferson, North Carolina, and London: McFarland & Company, Inc., Publishers, 2002, 47.

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On January 11, 1956, the hour-long episode "All the Trees in the Field" aired live in color on televisions across the United States and was broadcast directly from Bothwell Ranch. The episode, directed by Alan Neuman and written by Sylvia Richards, utilized the grove as the background for an original story about "the struggle of an elderly orange rancher to hold onto his beloved grove despite lush cash offers from subdividers and persistent pressure from members of his family."<sup>61</sup> The cast was led by film and stage actor James Bell, and included Melinda Plowman, Adrienne Marden, Robert Karnes, Amzie Strickland, Carolyn Craig, and others. Lindley Bothwell made an appearance in several scenes driving a tractor, while his wife Ann and several ranch laborers were also featured.<sup>62</sup> A \$10,000 1909 Mercedes racing car owned by Bothwell as part of his collection held at the ranch was even used as "an expensive prop that cost NBC nothing."<sup>63</sup>

According to the script held in the archives of the New York Public Library, Billy Rose Theatre Division, the episode began with a narration by an announcer teasing the story:

#### ANNCR'S VOICE

This program is coming to you live. It is not on film. You are now looking at the Rancho Rinconada in the San Fernando Valley near Los Angeles...an orange grove owned and operated by Mr. Lindley C. [sic] Bothwell...Here, against this actual background, you are going to see our story enacted...see it happen before your eyes...

(OVER A SHOT OF A CLEARED FIELD WHERE A BULLDOZER IS PILING UP THE CARCASSES OF UP-ROOTED TREES)

...a story which deals with deals with a very real situation...a problem which now...today...profoundly effects [sic] the lives of many people who live and work on California citrus ranches...

(OVER ANOTHER SHOT OF ORANGE GROVES)

...such as the one you are seeing here...a story brought to you live...in color...from THE AMERICAN SCENE!<sup>64</sup>

Already working at NBC for eight years, 31-year-old Neuman had a dream to complete "a series of live dramas outdoors in which the locale would be the first consideration and a good story to fit in the locale of equal importance."<sup>65</sup> After getting the approval of NBC executives Fred Wile Jr. and Tom Sarnoff, Neuman reached out to Richards to find an appropriate location and develop a script. Bothwell Ranch was not too far from her San Fernando Valley home, and

<sup>61</sup> Bill Bird, "Bill Bird Reports," *Pasadena Independent*, January 11, 1956: 25.

<sup>62</sup> Eve Starr, "First Dramatic TV Show Shot Outside," *Statesman Journal*, January 18, 1956: 13.

<sup>63</sup> Ibid.

<sup>64</sup> Sylvia Richards, Script for the NBC Matinee Theatre episode "All the Trees in the Field," held in the archives of the New York Public Library, Billy Rose Theatre Division, January 11, 1956.

<sup>65</sup> Allen Rich, "Listening Post and TV Review," *Valley Times*, January 13, 1956: 17.

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though she did not know the Bothwells, Richards “barged in and told them confidently, ‘NBC wants to do a coast to coast television show from your grove’” and they accepted.<sup>66</sup> To aid in the production, NBC had two mobile color units and five color cameras driven from New York City to Bothwell Ranch, with a short stopover to film the Rose Parade in Pasadena.<sup>67</sup>

Both local and national newspapers highlighted this technical advancement, with Bill Bird of the *Pasadena Independent* writing that “for the first time in the still very young history of television, an entire hour-long ‘live’ video drama will be telecast outdoors in color today.”<sup>68</sup> Allen Rich of the *Valley Times*, who had been invited to watch the rehearsals, acknowledged the “history-making video event,” adding that “yes, the orange trees were beautiful and the technical advances which permit a live color telecast of an outdoor show are greatly to be admired, and even wondered at.”<sup>69</sup> Eve Starr, whose column was printed in several newspapers across the country, called the episode technically almost perfect with beautiful color, though she thought the cast had struggled in the new environment. She recognized, “It was understandable. TV had never done anything like this before. For once, the play wasn’t the thing. If viewers understood this, they must have realized they were sitting in on an exciting portent of things to come in TV, cameras cut loose from the boundaries of four walls and free to roam at will around the world to tell their dramatic stories.”<sup>70</sup>

Neuman was pleased with NBC’s willingness to take a chance on this new method of film production, being quoted saying “We’re taking Shakespeare at his word – ‘All the world’s a stage.’”<sup>71</sup> Several decades later, in 2006, Neuman reflected on his work on the Matinee Theater episode at Bothwell Ranch in an interview for the Television Academy Foundation:

This is the San Fernando Valley, and one of the things that’s always going on there was at that time the development, and you know, orange groves all over the place and development. Tarzana was first becoming Tarzana. [...] When the appropriate time came, I shot it. I shot it in an actual orange grove in San Fernando, in the Valley. And the actors rehearsed as they would rehearse in a dry rehearsal, and they now rehearsed in the actual location and the cameras were there and we shot it. [...] It was the first remote drama ever in color. [...] The show to me personally was rewarding in that I made the location work again, because I knew I couldn’t get the same feeling – I believe the actors wouldn’t have the same feeling acting in the studio, but on the actual location it made a great deal of difference.<sup>72</sup>

Months after the broadcast, Matinee Theater won an Emmy Award for Best Contribution to Daytime Programming. NBC saw the filming of the episode at Bothwell Ranch as a potential opportunity for the future of television, “[believing] that the nation’s viewers may soon be seeing

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<sup>66</sup> Ibid.

<sup>67</sup> Ibid.

<sup>68</sup> Bill Bird, “Bill Bird Reports,” *Pasadena Independent*, January 11, 1956: 25.

<sup>69</sup> Allen Rich, “Listening Post and TV Review,” *Valley Times*, January 13, 1956: 17.

<sup>70</sup> Eve Starr, “First Dramatic TV Show Shot Outside,” *Statesman Journal*, January 18, 1956: 13.

<sup>71</sup> Bill Bird, “Bill Bird Reports,” *Pasadena Independent*, January 11, 1956: 25.

<sup>72</sup> Television Academy Foundation, “Alan Neuman | Television Academy Interviews,” Interview recorded on February 15, 2006 in Los Angeles, CA. <https://interviews.televisionacademy.com/interviews/alan-neuman> (accessed October 10, 2024).

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some of the world's most beautiful sights as backdrops for their daily TV fare."<sup>73</sup> Only three years later, on September 12, 1959, NBC began airing the Western television series *Bonanza*, one of the first shows filmed in color and utilizing outdoor locations near Lake Tahoe.

While the script for "All the Trees in the Field" is held in the archives of the New York Public Library, Billy Rose Theatre Division, no available recordings of the episode are known to exist.<sup>74</sup>

## Criterion B: Recreation

### *Lindley Fowler Bothwell (1901-1986)*

Lindley Fowler Bothwell was born in Los Angeles on August 1, 1901 to Samuel Fowler Bothwell and Myra Josephine Lindley. Both Samuel and Myra were recognized as "early settlers in the Valley [where] they planted one of the first orange groves."<sup>75</sup> Samuel was "one of Los Angeles' outstanding real estate developers" and the original developer of Windsor Square in the Wilshire district of Los Angeles<sup>76</sup> and Myra was a charter member of the West Adams Presbyterian Church and a graduate of the California Lutheran Hospital School of Nursing.<sup>77</sup> Myra's father, Dr. Walter Lindley, was a founder of the City of Whittier and the first dean of the University of Southern California (USC) Medical School.<sup>78</sup>

Not much is known about Bothwell's early life, though he enrolled at USC in 1919 and was very involved in activities on campus, including lettering in baseball for three years.<sup>79</sup> He established a new rowing record at Big Bear Lake in 1922<sup>80</sup> and was offered a crew scholarship to Harvard which he ultimately turned down.<sup>81</sup> Bothwell would also help establish the USC chapter of the Sigma Alpha Epsilon fraternity after he graduated.<sup>82</sup> Even with these other extracurricular activities, Bothwell gained the most popularity and esteem as the university's first yell king, leading the students and other fans in cheers during football games.

Bothwell's ability to excite the crowd was highlighted in newspapers at the time, with the *San Bernardino County Sun* noting that "Bothwell is known to practically every follower of sport in the South as the peerless yell king of U.S.C.," his prominence on campus "displayed by the fact that he is to reign at the head of the noise making this year for the third year in a row, having been elected each time by the student body."<sup>83</sup> He was credited with starting "the first rotating

<sup>73</sup> Bill Bird, "Bill Bird Reports," *Pasadena Independent*, January 11, 1956: 25.

<sup>74</sup> Staff at the UCLA Film & Television Archive was consulted and described that many early live television programs were not recorded at the time of broadcast as the only way a live program could be recorded before videotape was via a kinescope process in which a film camera was pointed at a TV monitor, with the program filmed off the screen. Due to the expense and basic quality of the process, many early live programs were not saved.

<sup>75</sup> "Mrs. Bothwell Rites Tomorrow," *Valley Times*, May 16, 1962: 2.

<sup>76</sup> "Realty Man's Burial Today," *Los Angeles Times*, March 16, 1943: 28.

<sup>77</sup> "Myra Bothwell Dies in Hospital; Plan Rites Today," *Van Nuys News and Valley Green Sheet*, May 17, 1962: 62.

<sup>78</sup> "Mrs. Bothwell of Pioneer L.A. Family Dies," *Los Angeles Times*, May 16, 1962: 28.

<sup>79</sup> George P. Edmonston Jr., "OAC's king of the stunt card," *Corvallis Gazette Times*, October 25, 2002: 11, 15.

<sup>80</sup> "Rowing Record is Established," *San Bernardino County Sun*, August 27, 1922: 11.

<sup>81</sup> George P. Edmonston Jr., "OAC's king of the stunt card," *Corvallis Gazette Times*, October 25, 2002: 11, 15.

<sup>82</sup> Edward J. Boyer, "USC's 'Mr. B,' Yell, Song Girl Coach, Dies," *Los Angeles Times*, June 21, 1986: 30.

<sup>83</sup> "Rowing Record is Established," *San Bernardino County Sun*, August 27, 1922: 11.

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card stunts in cheering sections at USC football games – the first being performed by 500 men, all wearing white shirts and seated at the 50-yard line in the Los Angeles Memorial Coliseum.”<sup>84</sup>

Graduating from USC in 1924 with both a bachelor’s degree and master’s degree in history and geology, Bothwell quickly continued his education at the Oregon Agricultural College (OAC, later Oregon State University) in Corvallis, Oregon. At OAC, Bothwell was once again recruited to lead the student body in cheers, “creating the first animated card stunts in college football history.”<sup>85</sup> Though card stunts were already a mainstay of football games starting with their introduction at the University of California, Berkeley in 1908, Bothwell demonstrated a technique of bringing the static images to life with more coordinated efforts. His first animated card stunt consisted of “[depicting] a beaver, Oregon State’s mascot, smashing its tail down on a lemon-yellow O, symbolizing the University of Oregon.”<sup>86</sup> Bothwell’s skill in rallying the crowd caught the attention of University of Notre Dame football coach Knute Rockne who asked Bothwell to be an honorary cheerleader at the Fighting Irish’s Rose Bowl match against Stanford University on January 1, 1925.<sup>87</sup>

Even after graduating from OAC in 1926 with a degree in agriculture, Bothwell would continue to have strong ties to cheerleading through the rest of his life. He was awarded a miniature gold megaphone by the associated students of OAC for being “one of the best yell leaders [the school] has ever had” and “[introducing] many new bleacher stunts and new O.A.C. yells.”<sup>88</sup> In 1964, Bothwell would be selected to coach the USC yell kings with the *Los Angeles Times* stating that “cheers from the USC rooting section next fall should have a decided Valley flavor.”<sup>89</sup> In 1972 and 1974, Bothwell helped guide the USC Song Girls to being named best song-leading team by the International Cheerleading Foundation.<sup>90</sup> Years after Bothwell’s death, the *Corvallis Gazette Times* recognized that “if cheerleaders had a hall of fame, Lindley Bothwell would occupy a special place among the inductees.”<sup>91</sup>

It was at OAC that Bothwell would meet his first wife, Marion Seale, who he would marry at the Stanford University Chapel in 1927. The marriage was noted as being “of much interest as it links together two pioneer families who made early California history, the one in Northern and the other in Southern California”<sup>92</sup> Marion’s great-grandfather “had one of the original Spanish grants of a large tract of land surrounding and including the present site of Palo Alto.”<sup>93</sup> Bothwell and Marion settled in the San Fernando Valley with the *Corvallis Gazette Times* noting in 1928 that “the Bothwells are now growing oranges near Los Angeles.”<sup>94</sup> They would soon have a son named Lindley Fowler Bothwell, Jr. in 1930 and a daughter named Bonnie Jean

<sup>84</sup> Edward J. Boyer, “USC’s ‘Mr. B,’ Yell, Song Girl Coach, Dies,” *Los Angeles Times*, June 21, 1986: 30.

<sup>85</sup> George P. Edmonston Jr., “OAC’s king of the stunt card,” *Corvallis Gazette Times*, October 25, 2002: 11, 15.

<sup>86</sup> Jim Murray, “On Second Thought, Maybe Fan Can Use a Little Cheering Up,” *Los Angeles Times*, March 12, 1985: 29, 36.

<sup>87</sup> George P. Edmonston Jr., “OAC’s king of the stunt card,” *Corvallis Gazette Times*, October 25, 2002: 11, 15.

<sup>88</sup> “Former Aggie Yell King is Honored,” *Oregon Daily Journal*, October 28, 1926: 18.

<sup>89</sup> “He’ll Lead Those Cheers You’ll Hear,” *Los Angeles Times*, June 4, 1964: 136.

<sup>90</sup> Edward J. Boyer, “USC’s ‘Mr. B,’ Yell, Song Girl Coach, Dies,” *Los Angeles Times*, June 21, 1986: 30.

<sup>91</sup> George P. Edmonston Jr., “OAC’s king of the stunt card,” *Corvallis Gazette Times*, October 25, 2002: 11, 15.

<sup>92</sup> “University Ceremony,” *Los Angeles Times*, September 18, 1927: 43.

<sup>93</sup> Ibid.

<sup>94</sup> “Bothwells in Corvallis,” *Corvallis Gazette Times*, November 14, 1928: 3.



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Bothwell in 1935. At some time between 1945 and 1948, Bothwell and Marion divorced, and Bothwell married Helen Ann Grossman, known as Ann, with whom he would remain through the rest of his life.<sup>95</sup>

In addition to his ventures as a citrus grower, described earlier in this nomination, Bothwell spent much of his time pursuing a hobby in collecting and showing off old automobiles that ultimately brought him additional income and recognition across the country. Bothwell first began collecting old automobiles in the 1920s, when he purchased a 1901 or 1902 Oldsmobile “just for laughs.”<sup>96</sup> By 1946, his collection had grown to “50 assorted relics of the infant automotive age” and “some decrepit boats, buggies, one-horse shays, hacks, surreys with the fringe on top and surreys without any fringe whatsoever.”<sup>97</sup> Bothwell would rent out his vehicles to local film and television studios for use in their productions, and even featured his 1909 Mercedes in the Matinee Theater television episode filmed on his ranch. Businesses such as the Security First National Bank also rented from Bothwell’s collection, with twelve cars displayed across several branches in 1941 to promote the bank’s automobile loan plan.<sup>98</sup>

Historic newspaper documentation varies in terms of the total number of vehicles in the collection at its peak, though the *Los Angeles Times* noted in 1948 that Bothwell has “120 machines, the second largest such privately-owned collection in the world.”<sup>99</sup> At different points in time, Bothwell’s collection included cars previously owned by other historical figures such as “the Czar of Russia’s 1911 Rolls Royce; English King George V’s 1910 Daimler; Henry Huntington’s (Southern Pacific railroad magnate) 1912 Lozier; Indy 500 speedster Dario Resta’s famous 1913 Peugeot; and two of racing legend Barney Oldfield’s most famous machines, his 1907 Stearns and a 1907 Benz.”<sup>100</sup> Bothwell was also recognized as having “the only collection of horse-drawn street cars in the United States,” also keeping train cars and bulldozers.<sup>101</sup>

Bothwell stored his collection in barns on Bothwell Ranch, with *The Morning Union* observing that he “maintains what is perhaps the world’s largest private museum of old autos on his 55-acre orange grove.”<sup>102</sup> For his collection of streetcars, Bothwell “built a streetcar barn on his ranch and had over a mile of track put down to entertain family, friends and visitors.”<sup>103</sup> In 1949, Bothwell suffered a devastating loss when a fire began in a “bunkhouse housing boys caring for Bothwell’s citrus crops” and destroyed “32 antique automobiles, streetcars, fire engines and a covered wagon” priced at \$50,000 to \$75,000.<sup>104</sup> Among the vehicles that burned was the only two-cylinder Packard (a 1903 model) in existence. News of the fire spread in newspapers across

<sup>95</sup> “Marriage Licenses,” *Santa Ana Register*, December 3, 1948: 28.

<sup>96</sup> “Scientist’s Hobby Paying So Well He Can Pursue His Work for Fun,” *Newark Star Ledger*, October 7, 1946: 7.

<sup>97</sup> Ibid.

<sup>98</sup> “Once an Inspiration,” *Eagle Rock Sentinel*, August 22, 1941: 11.

<sup>99</sup> “‘Progress’ Fair Opens 11-Day Run at Del Mar,” *Los Angeles Times*, June 26, 1948: 19.

<sup>100</sup> George P. Edmonston Jr., “OAC’s king of the stunt card,” *Corvallis Gazette Times*, October 25, 2002: 11, 15.

<sup>101</sup> “Once an Inspiration,” *Eagle Rock Sentinel*, August 22, 1941: 11.

<sup>102</sup> “Old Autos,” *The Morning Union*, July 19, 1964: 95. Note that this claim may have been exaggerated as there were also other large private collections such as those owned by J.B. Nethercutt in Sylmar and Briggs Cunningham in Newport Beach.

<sup>103</sup> George P. Edmonston Jr., “OAC’s king of the stunt card,” *Corvallis Gazette Times*, October 25, 2002: 11, 15.

<sup>104</sup> “Fire Destroys Antique Autos Used in Films,” *Los Angeles Times*, February 5, 1949: 1.

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the country, as well as several in Canada. Still, Bothwell continued to rebuild his collection and be involved in the antique vehicle community throughout his life.

Two cars in the collection competed at the prestigious annual Concours d'Elegance in Pebble Beach. Bothwell received an Honorable Mention for his 1909 Mercedes race car in the Vintage Car class in 1955.<sup>105</sup> After his death, his wife Ann entered the 1913 Peugeot race car in 2006, placing second in the Race Car class.<sup>106</sup>

Several of the cars on site were not just kept for display, but also actively raced by Bothwell and others. In 1948, Bothwell lent four of his vehicles to compete in a race at the California State Fair in Sacramento, winning the competition in his 1907 Stearns.<sup>107</sup> His at the time 17-year-old son, Lindley Bothwell, Jr., had also driven one of the cars at the fair. The following year, Bothwell entered his 1913 Peugeot in the Indianapolis 500, "never [having] any expectation of qualifying."<sup>108</sup> He entered "not with any serious intention of getting in the race, but for the opportunity of seeing what the car could do on the track under modern day conditions."<sup>109</sup> Bothwell was able drive the car at an average speed of 103.25 miles per hour, exceeding Dario Resta's 84.05 miles per hour average from when Resta drove the same car to a win the 1916 race.<sup>110</sup>

Bothwell was a charter member of the Horseless Carriage Club, which organized in 1937 in Los Angeles and was dedicated to celebrating and showcasing vintage cars and other vehicles. He served as the national president for seven years, beginning his first term in 1947, and was on the board of directors for 10 years.<sup>111</sup> In 1953, under Bothwell's leadership, the Horseless Carriage Club had "2900 members in the United States and some foreign countries."<sup>112</sup> Bothwell organized annual caravans of horseless carriages from the "brass age" (1900-1915) to drive across California, many of the owners "dressed in dusters, goggles and the other paraphernalia of the era of their cars."<sup>113</sup> The 1950 caravan included about 150 members of the Horseless Carriage Club and "40 different makes of cars all over 35 years old."<sup>114</sup>

Because of the uniqueness and number of cars in Bothwell's collection, Bothwell Ranch would often serve as the venue of large fundraisers for local organizations and even political candidates. Ann was actively involved in Circle D, the local chapter of the nationwide Florence Crittenton Homes dedicated to raising funds to house "unwed mothers." The organization would host a Vintage Vehicle Fair at Bothwell Ranch in which the collection would be on display for visitors to admire. The event, held on October 8, 1961, was "the first public showing of the entire

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<sup>105</sup> Katie Leach, *Pebble Beach Concours d'Elegance: A Sixty Year Chronicle of Automotive Excellence*, Pebble Beach, CA: Sandra and Marin E. Button with the Pebble Beach Company, publishers, 2011, 17.

<sup>106</sup> *Ibid*, 293.

<sup>107</sup> "Barney Oldfield Car Outlasts 3 Old Timers," *Sacramento Union*, September 13, 1948: 7.

<sup>108</sup> "Time Running Out for Racers," *Vincennes Sun-Commercial*, May 27, 1949: 9.

<sup>109</sup> Don O'Reilly, "Inside Auto Racing," *Shreveport Journal*, January 7, 1958: 9.

<sup>110</sup> *Ibid*.

<sup>111</sup> George P. Edmonston Jr., "OAC's king of the stunt card," *Corvallis Gazette Times*, October 25, 2002: 11, 15.

<sup>112</sup> Vera Williams, "Hold Your Hats for a Gas Buggy Ride!" *Long Beach Press-Telegram*, June 7, 1953: 95.

<sup>113</sup> *Ibid*.

<sup>114</sup> Cap Gettys, "Through the Windshield," *Valley Times*, April 4, 1950: 10.

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Bothwell collection of more than 100 antique cars dating from 1895 to 1926...one of the largest private collections in the world.”<sup>115</sup> In anticipation of the Vintage Vehicle Fair, the *Los Angeles Evening Citizen News* produced an article describing Bothwell’s long-time hobby collecting cars, adding that “to house the huge assortment of cars, the Bothwells built two double-decked barns and numerous Quonset huts on their orange grove ranch.”<sup>116</sup> When Ann became president of the Crittenton Association, Bothwell Ranch again played site of an antique car show and bazaar titled Flossie’s Fair in 1970.<sup>117</sup>

Both California Assemblyman Lou A. Cusanovich and United States Representative Barry Goldwater Jr. hosted rallies and fundraisers at Bothwell Ranch with the cars also on display.<sup>118</sup> Bothwell Ranch also hosted a fundraiser for the Cultural Heritage Foundation in 1972 in which proceeds from the event “helped speed the restoration work now underway at Heritage Square where the Hale House and the Valley Knudsen Garden Residence are being refurbished as Los Angeles Architectural landmarks.”<sup>120</sup>

In addition to tending to his orange grove, supporting the cheer and yell efforts at USC and OAC, collecting vintage vehicles, and participating in philanthropic endeavors, Bothwell had a wide range of interests and was even recognized as a pioneer surfer. The *Los Angeles Evening Citizen News* wrote:

Lindley Bothwell’s hobbies are not limited to cars by any means. Between farming, he collects toy trains, is a Civil War amateur historian and is an alumni advisor for a fraternity at USC, where he is still honored as one of the university’s greatest yell leaders and the originator of football card stunts. Bothwell is also responsible for building the first balsa wood surfing board, in memory of which a huge surfing board stands in front of the house. What does Mrs. Bothwell do for a hobby? “Most of the time, I just try to help my husband keep up his hobbies,” she smiled.<sup>121</sup>

Bothwell died on June 19, 1986 after a long illness at the age of 84.<sup>122</sup> He was survived by his wife Ann, who continued to operate Bothwell Ranch and take care of the vehicles on site until her death in 2016. Featured in its own catalogue, the Bothwells’ automobile collection was auctioned off by Bonhams on November 11, 2017, bringing in over \$13 million in sales.<sup>123</sup>

<sup>115</sup> “Florence Crittenton Home sponsors Vintage Vehicle Fair at Woodland Hills Sunday,” *Santa Barbara Star*, October 5, 1961: 1.

<sup>116</sup> “Get the Dusters, Mother, It’s the Horseless Cart,” *Los Angeles Evening Citizen News*, October 7, 1961: 3.

<sup>117</sup> “Flossie’s Fair Will Benefit Home Fund,” *Los Angeles Times*, June 12, 1970: 84.

<sup>118</sup> “Antique Cars Aid to Drive,” *Valley Times*, September 28, 1960: 3.

<sup>119</sup> “Goldwater Shindig to Feature Cars,” *Los Angeles Times*, October 15, 1972: 331.

<sup>120</sup> “Barbecue to feature 98 antique cars,” *Redlands Daily Facts*, April 25, 1972: 9.

<sup>121</sup> “Get the Dusters, Mother, It’s the Horseless Carriage,” *Los Angeles Evening Citizen News*, October 7, 1961: 3.

<sup>122</sup> Edward J. Boyer, “USC’s ‘Mr. B,’ Yell, Song Girl Coach, Dies,” *Los Angeles Times*, June 21, 1986: 30.

<sup>123</sup> Mark Vaughn, “Bothwell Auction Nets Over \$13 Million, Including \$7.3 Million Peugeot GP Car,” *Autoweek*, November 13, 2017. <https://www.autoweek.com/car-life/events/a1834961/bothwell-auction-nets-over-13-million-including-73-million-peugeot-gp-car/> (accessed October 15, 2024).

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## Criteria Consideration G

Though the significance of Bothwell Ranch stretches back over 50 years to when Lindley F. Bothwell began managing the property in 1926, the period of significance ends in 2016 to capture the extent of its role as the last commercial citrus grove in the San Fernando Valley. Bothwell Ranch was continuously operated by the Bothwell family for 90 years, with Bothwell's wife Ann continuing to manage operations after Bothwell's death in 1986 until her own death in 2016. Because Bothwell Ranch is significant in representing the once prevalent agricultural industry in the San Fernando Valley and is one of the last physical remnants of that history in the built environment, the end of the period of significance in 2016 emphasizes the resilience of the property in remaining largely intact and actively functioning as a commercial citrus grove while surrounding citrus groves were lost to encroaching development over time.

## Conclusion

As described, Bothwell Ranch meets National Register Criteria A and B at the local level of significance. Under Criterion A in the area of Agriculture, Bothwell Ranch is associated with the once-dominant citrus industry in Los Angeles as the last operating commercial orange grove in the San Fernando Valley. Spurred by the construction of the Owens Valley aqueduct and the annexation of the San Fernando Valley into the city of Los Angeles, citrus production came to be part of the region's cultural identity. Bothwell began tending to the orange groves at Bothwell Ranch in 1926, a time when citrus was the most important cash crop in Los Angeles. Enduring encroaching development that substantially reduced the agricultural industry of the San Fernando Valley following the end of World War II, Bothwell Ranch continued to operate as a commercial orange grove for a total of 90 years under ownership of the Bothwell family and was already recognized in the 1970s as one of the last of its kind.

Under Criterion A in the area of Entertainment, Bothwell Ranch is associated with the entertainment industry as the location of the first live outdoor dramatic color television broadcast. Color television was still a novelty in the 1950s and television studios were looking for new ways to entice audiences into making the transition from black and white. In addition to airing largescale color productions, NBC produced an anthology drama series called Matinee Theater that was presented daily, live and in color from a studio. In 1955, director Alan Neuman wanted to push the boundaries of this burgeoning film technique and proposed an episode of Matinee Theater filmed on location. Writer Sylvia Richards recommended Bothwell Ranch as the location and prepared a script about a struggling orange rancher for the episode "All the Trees in the Field," which featured cameos from Bothwell and his wife Ann. Following the airing of the episode, newspapers heralded this achievement in television, predicting that this would allow for future stories to be told in color outside the confines of a studio.

Under Criterion B in the area of Recreation, Bothwell Ranch is associated with prominent rancher, yell king, and vintage vehicle collector Lindley F. Bothwell. Bothwell lived a storied life that was well documented in newspapers since his time as a popular yell king as a student at USC until his death. Most notably, Bothwell was recognized for his hobby of collecting and even

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racing vintage vehicles, amassing a collection considered to be one of the largest in the world. To house his collection, Bothwell constructed several storage sheds and two-story garages at Bothwell Ranch that are still extant. Bothwell, as president of the Horseless Carriage Club, would often organize meets to showcase his collection. In 1949, he entered his 1913 Peugeot in the Indianapolis 500, not with the intention of winning but to showcase its power. Bothwell Ranch would serve as the site of large fundraisers for politicians and local organizations centered around visitors paying a fee to view Bothwell's collection. It is the most important property related to Bothwell's life and directly related to both the work and hobby for which he was known.

The period of significance is 1926, when Bothwell began managing the property as a commercial orange grove, to 2016, when operations at the grove ceased following the death of Bothwell's widow, Ann. Though the significance of Bothwell Ranch stretches back over 50 years to 1926, the property satisfies Criteria Consideration G as the year 2016 provides a clear cut-off date encompassing the extent of Bothwell Ranch's role as the last commercial citrus grove in the San Fernando Valley, operated continuously under the Bothwells for 90 years.

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## 9. Major Bibliographical References

**Bibliography** (Cite the books, articles, and other sources used in preparing this form.)

Anthea Marie Hartig, "Citrus Growers and the Construction of the Southern California Landscape, 1880-1940," PhD. Dissertation, University of California, Riverside, December 2001.

Architectural Resources Group, "Historic Resources Survey Report: Encino-Tarzana Community Plan Area," SurveyLA Los Angeles Historic Resources Survey, February 2013.

California Department of Transportation, "A Historical Context and Archaeological Research Design for Agricultural Properties in California," 2007.

City of Los Angeles, Historic-Cultural Monument Nomination Form for Bothwell Ranch, Prepared by Melissa Jones, City Planning Associate, August 16, 2019.

*Corvallis Gazette Times* newspaper articles, 1928-2002.

*Eagle Rock Sentinel* newspaper articles, 1941.

Jared Farmer, *Trees in Paradise: A California History*, New York and London: W.W. Norton & Company, 2013.

Jim Carlton, "The Last Working Orange Grove in the San Fernando Valley to Give Way to Homes," *The Wall Street Journal*, December 27, 2023. <https://www.wsj.com/us-news/the-last-working-orange-grove-in-the-san-fernando-valley-to-give-way-to-homes-b0a0d191>.

Katie Leach, *Pebble Beach Concours d'Elegance: A Sixty Year Chronicle of Automotive Excellence*, Pebble Beach, CA: Sandra and Marin E. Button with the Pebble Beach Company, publishers, 2011.

Kevin Roderick, *The San Fernando Valley: America's Suburb*, Los Angeles, CA: Los Angeles Times Books, 2001.

*Long Beach Press-Telegram* newspaper articles, 1953.

Los Angeles County Registrar/Recorder/County Clerk real estate records, 1926.

*Los Angeles Evening Citizen News* newspaper articles, 1936-1961.

*Los Angeles Times* newspaper articles, 1927-1998.

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LSA Associates, Inc., "Los Angeles Citywide Historic Context Statement, Context: Industrial Development, 1850-1980," SurveyLA Los Angeles Historic Resources Survey, September 2011, revised February 2018.

Mark Vaughn, "Bothwell Auction Nets Over \$13 Million, Including \$7.3 Million Peugeot GP Car," *Autoweek*, November 13, 2017. <https://www.autoweek.com/car-life/events/a1834961/bothwell-auction-nets-over-13-million-including-73-million-peugeot-gp-car/>.

Michael Lisicky, "Color TV Debuted At The 1954 Rose Parade, Thanks to RCS, NBC And Woolworth," *Forbes*, January 1, 2021. <https://www.forbes.com/sites/michaellisicky/2021/01/01/color-tv-debuted-at-the-1954-rose-parade-thanks-to-rca-nbc-and-woolworth/>.

*The Morning Union* [Springfield, MA] newspaper articles, 1964.

*Newark Star Ledger* newspaper articles, 1946.

*Oregon Daily Journal* newspaper articles, 1926.

*Pasadena Independent* newspaper articles, 1956.

*Redlands Daily Facts* newspaper articles, 1972.

*Sacramento Union* newspaper articles, 1948.

*San Bernardino County Sun* newspaper articles, 1922.

*San Francisco Examiner* newspaper articles, 1939.

*Santa Ana Register* newspaper articles, 1948-1949.

*Santa Barbara Star* newspaper articles, 1961.

*Shreveport Journal* newspaper articles, 1958.

Silvia Richards, Script for the NBC Matinee Theatre episode "All the Trees in the Field," held in the archives of the New York Public Library, Billy Rose Theatre Division, January 11, 1956.

*Statesman Journal* [Salem, OR] newspaper articles, 1956.

Susan Murray, *Bright Signals: A History of Color Television*, Durham and London: Duke University Press, 2008.

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Television Academy Foundation, "Alan Neuman | Television Academy Interviews," Interview recorded on February 15, 2006 in Los Angeles, CA.

<https://interviews.televisionacademy.com/interviews/alan-neuman>.

Teresa Grimes, Historic Resource Assessment Report for 5300 Oakdale Avenue, Los Angeles, California, January 2024.

US Citrus Nursery, "Citrus Tree Lifespan: What's the Average Life Expectancy of a Citrus Tree," June 8, 2019. <https://uscitrusnursery.com/blogs/citrus-simplified/citrus-tree-lifespan-whats-the-average-life-expectancy-of-a-citrus-tree>.

*Valley Times* newspaper articles, 1950-1960.

*Van Nuys News and Valley Green Sheet* newspaper articles, 1938-1962.

*Vincennes Sun-Commercial* newspaper articles, 1949.

William Hawes, *Filmed Television Drama, 1952-1958*, Jefferson, North Carolina, and London: McFarland & Company, Inc., Publishers, 2002, 47.

*Yellowstone News* newspaper articles, 1951.

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**Previous documentation on file (NPS):**

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

**Primary location of additional data:**

- ☐ State Historic Preservation Office
- ☐ Other State agency
- ☐ Federal agency
- ☐ Local government
- ☐ University
- ☐ Other
- Name of repository: \_\_\_\_\_

**Historic Resources Survey Number (if assigned):** \_\_\_\_\_



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## 10. Geographical Data

**Acreage of Property** 13.8 acres

### Latitude/Longitude Coordinates

Datum if other than WGS84: \_\_\_\_\_  
(enter coordinates to 6 decimal places)

- |                        |                        |
|------------------------|------------------------|
| 1. Latitude: 34.167103 | Longitude: -122.163994 |
| 2. Latitude: 34.167525 | Longitude: -118.562184 |
| 3. Latitude: 34.165962 | Longitude: -118.561497 |
| 4. Latitude: 34.165860 | Longitude: -118.565810 |

### Verbal Boundary Description (Describe the boundaries of the property.)

The boundary of the property is delineated by the boundary of the four parcels encompassing Bothwell Ranch (Assessor Parcel Numbers 2164-008-001, 2164-008-006, 2164-008-007, and 2164-008-005). See Assessor and Boundary Maps.

### Boundary Justification (Explain why the boundaries were selected.)

The boundary coincides with recorded parcel boundaries and encompasses the full extent of the property.

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## 11. Form Prepared By

name/title: Alvin-Christian Nuval, Principal Associate; Robert Jay Chattel, AIA, President  
organization: Chattel, Inc.  
street & number: 13417 Ventura Boulevard  
city or town: Sherman Oaks state: CA zip code: 91423  
e-mail: [alvin@chattel.us](mailto:alvin@chattel.us)  
telephone: (818) 788-7954  
date: December 2024

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## Additional Documentation

Submit the following items with the completed form:

- **Maps:** A USGS map or equivalent (7.5 or 15 minute series) indicating the property's location.

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- **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.
- **Additional items:** (Check with the SHPO, TPO, or FPO for any additional items.)

### Photographs

Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels (minimum), 3000x2000 preferred, at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map. Each photograph must be numbered and that number must correspond to the photograph number on the photo log. For simplicity, the name of the photographer, photo date, etc. may be listed once on the photograph log and doesn't need to be labeled on every photograph.

### Photo Log

Name of Property: Bothwell Ranch  
City or Vicinity: Los Angeles  
County: Los Angeles  
State: California  
Photographer: Robert Chattel and Alvin Nuval  
Date Photographed: October 18, 2024

Description of Photograph(s) and number, include description of view indicating direction of camera:

- |         |  |
|---------|--|
| 1 of 16 | Bothwell Ranch from corner of Oakdale and Collier, view northeast                                    |
| 2 of 16 | Entrance to Bothwell Ranch from Oakdale, view east   |
| 3 of 16 | East-west driveway from Oakdale, view west   |
| 4 of 16 | Citrus Grove from Oakdale, view east   |
| 5 of 16 | Citrus Grove and fencing along Oakdale, view southeast   |
| 6 of 16 | Citrus Grove from Collier, view north  |
| 7 of 16 | Citrus Grove from Collier, view north  |
| 8 of 16 | Citrus Grove and Main House from Collier, partial roof and chimney of Main House visible, view north |

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- 9 of 16 Storage Shed from Collier, view northeast
- 10 of 16 Citrus Grove (left), Two-Story Garage A (center), and Storage Shed (right), view north
- 11 of 16 Storage Sheds (Quonset huts) from Collier, view northeast
- 12 of 16 Storage Sheds from Collier, view northwest
- 13 of 16 Storage Shed from Collier, view northeast
- 14 of 16 Two-Story Garage B from Collier, view northeast
- 15 of 16 Train Shed from Corbin, view southwest
- 16 of 16 Bothwell Ranch from Corbin with Multi-Purpose Building visible at right, view south

**Paperwork Reduction Act Statement:** This information is being collected for nominations to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.). We may not conduct or sponsor and you are not required to respond to a collection of information unless it displays a currently valid OMB control number.

**Estimated Burden Statement:** Public reporting burden for each response using this form is estimated to be between the Tier 1 and Tier 4 levels with the estimate of the time for each tier as follows:

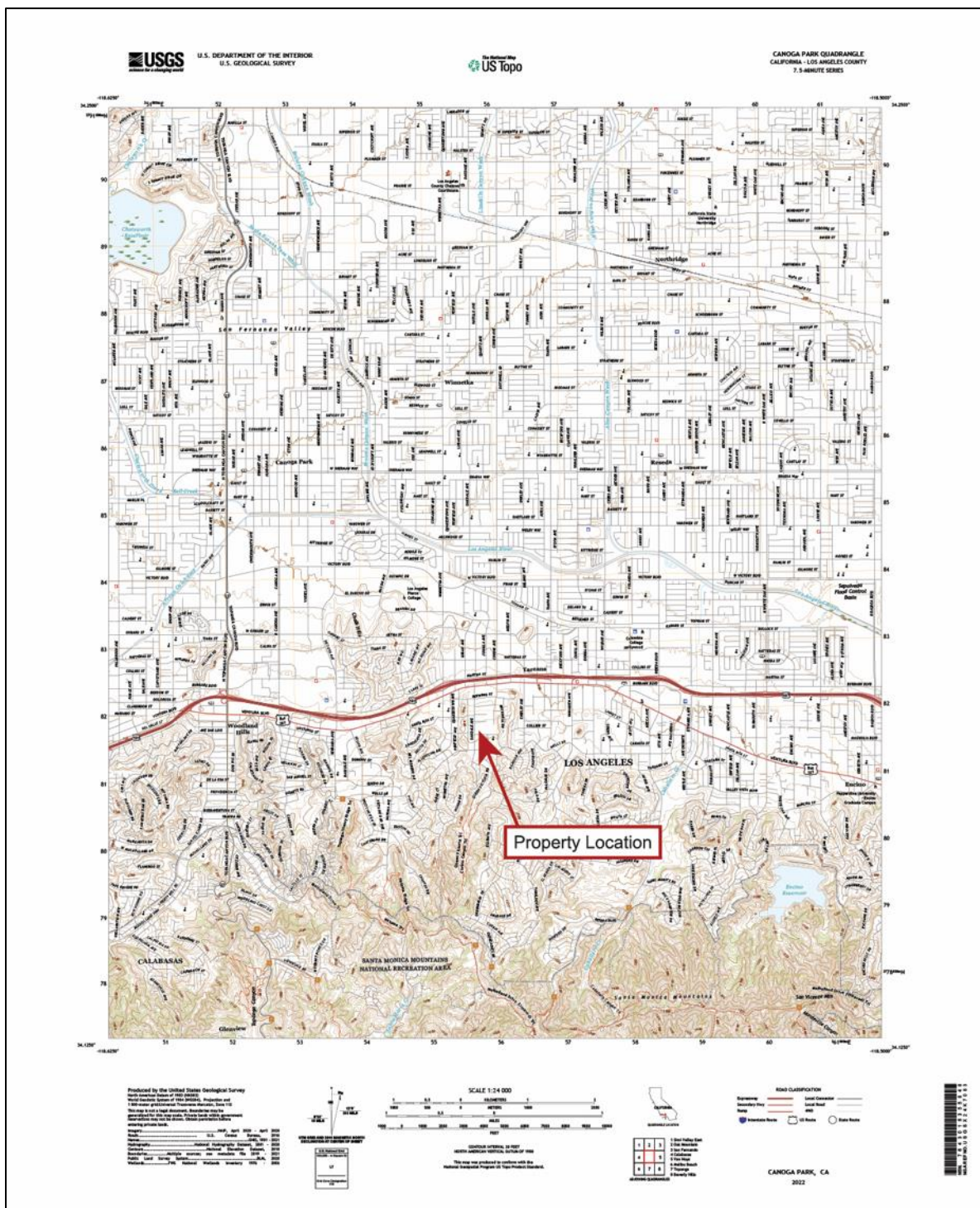
Tier 1 – 60-100 hours  
Tier 2 – 120 hours  
Tier 3 – 230 hours  
Tier 4 – 280 hours

The above estimates include time for reviewing instructions, gathering and maintaining data, and preparing and transmitting nominations. Send comments regarding these estimates or any other aspect of the requirement(s) to the Service Information Collection Clearance Officer, National Park Service, 1201 Oakridge Drive Fort Collins, CO 80525.

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## Location Map



United States Geological Survey (USGS), 2022

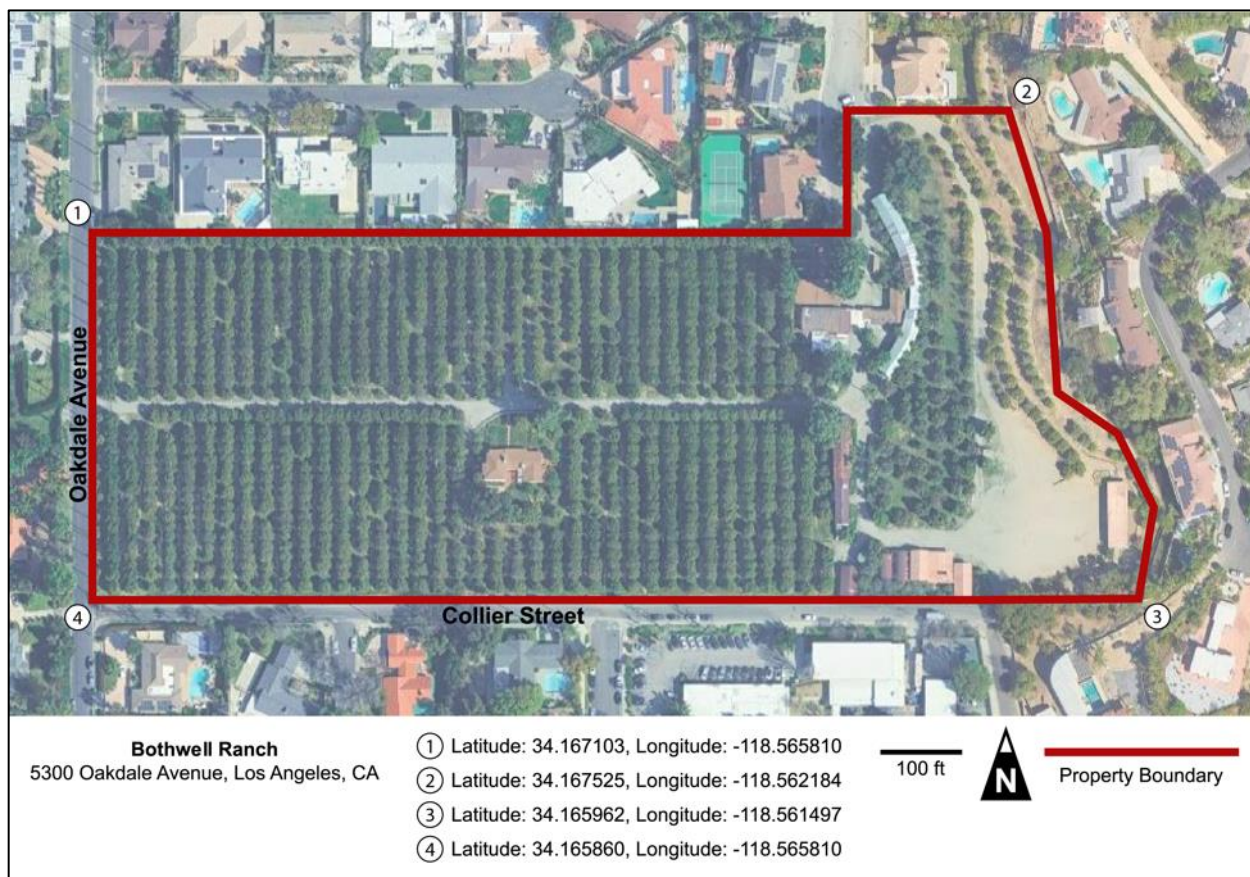


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## Boundary Map

- |                        |                        |
|------------------------|------------------------|
| 1. Latitude: 34.167103 | Longitude: -122.163994 |
| 2. Latitude: 34.167525 | Longitude: -118.562184 |
| 3. Latitude: 34.165962 | Longitude: -118.561497 |
| 4. Latitude: 34.165860 | Longitude: -118.565810 |

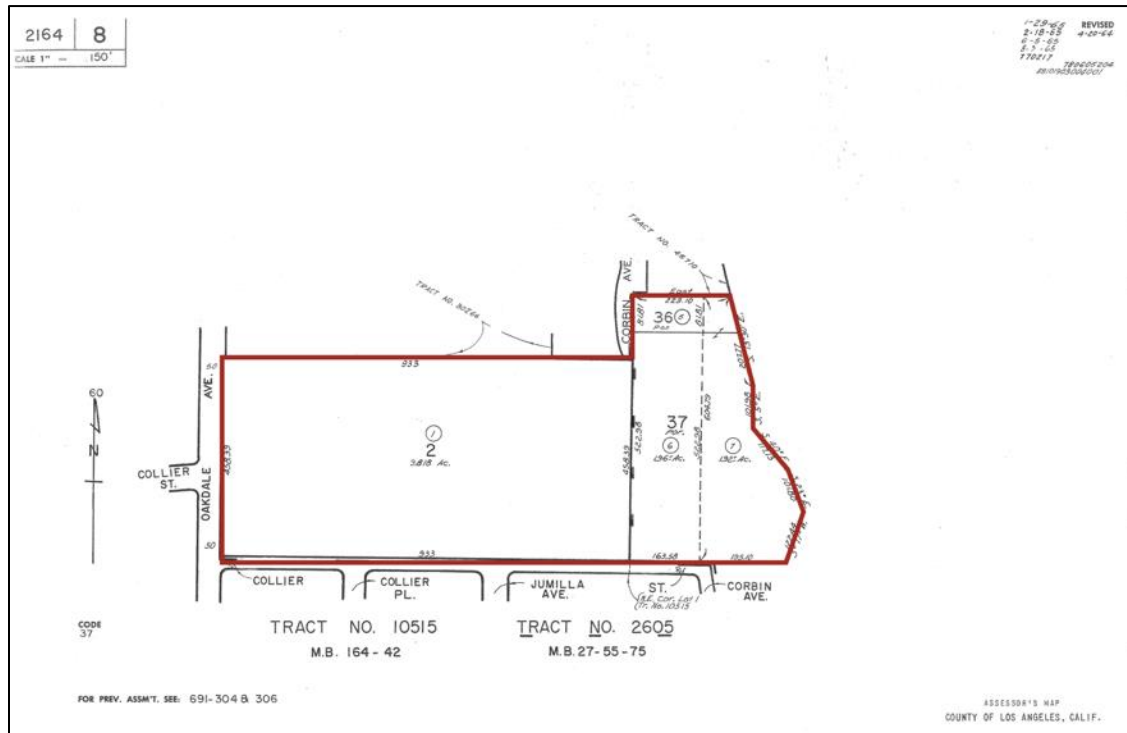


Google Earth, 2024

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## Assessor Map

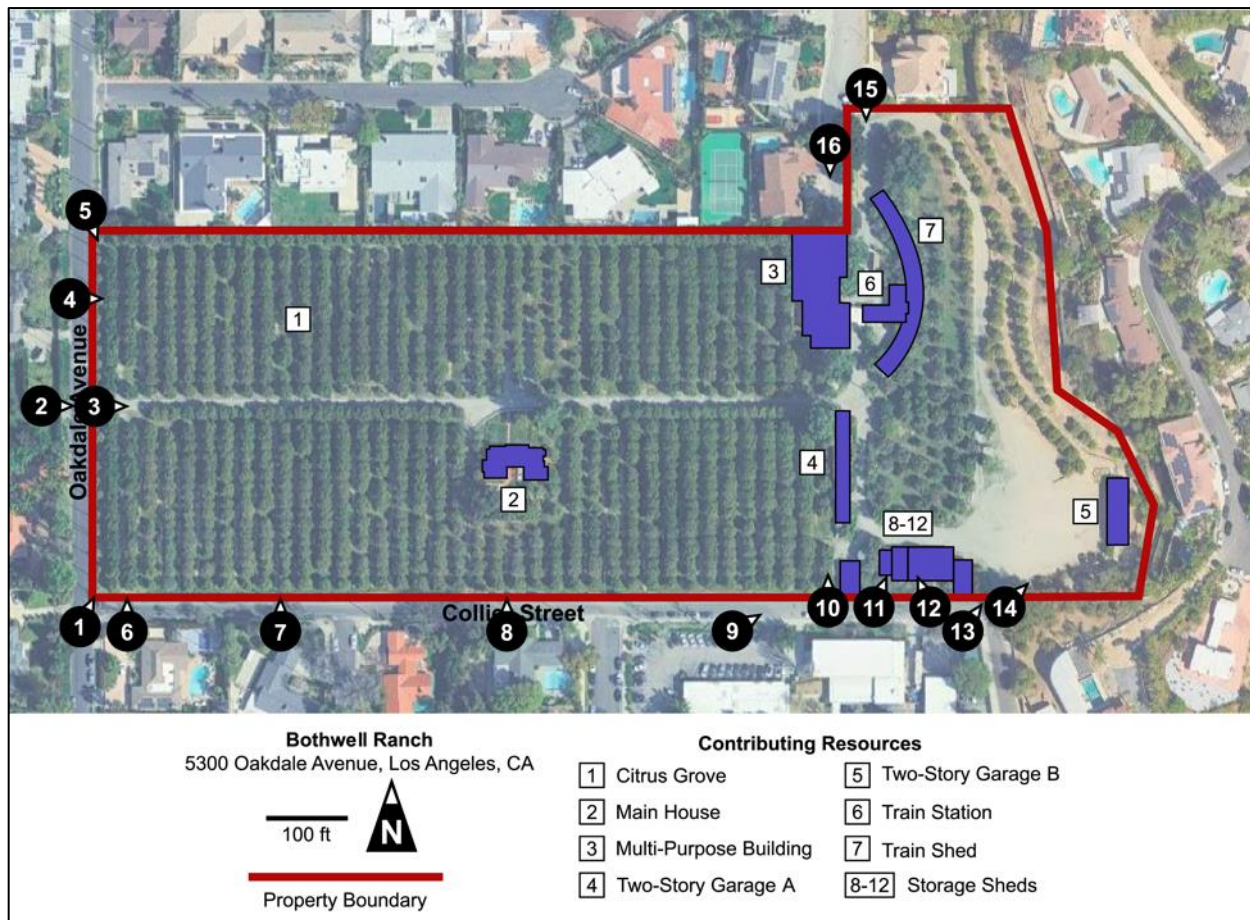


Los Angeles County Office of the Assessor, 1965

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### Sketch Map/Photo Key





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**Figure 1** Historic aerial with Bothwell Ranch outlined in red, 1947; NETR Historic Aerials



**Figure 2** Historic aerial with Bothwell Ranch outlined in red, all extant buildings and structures constructed, 1978; NETR Historic Aerials





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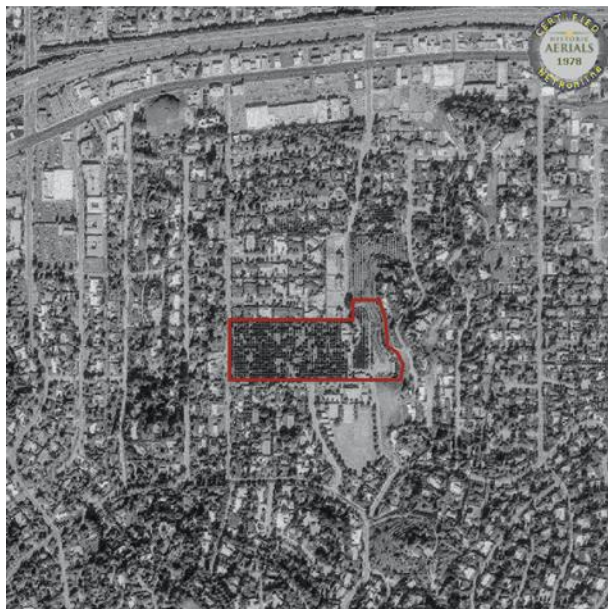
**Figure 3** Historic aerials showing dwindling orange groves in vicinity, Bothwell Ranch outlined in red; NETR Historic Aerials, Google Maps



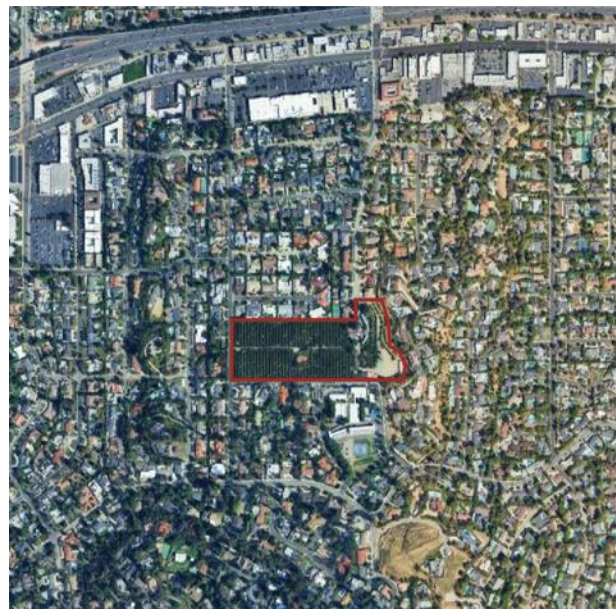
1947



1964



1978



2024

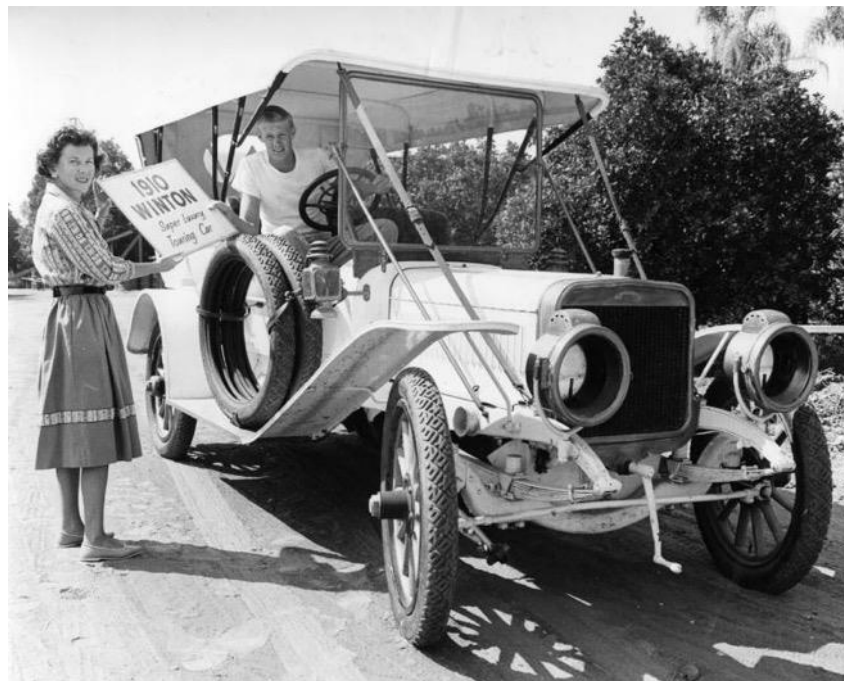
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**Figure 4** Bothwell packing Yule baskets with oranges and grapefruit, 1956; *Los Angeles Times*



**Figure 5** Ann Bothwell at Bothwell Ranch with mechanic Tim Henry, 1961; *Valley Times*



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**Figure 6** Cars at Two-Story Garage B, 1963; *Valley Times*



**Figure 7** Ann Bothwell with trophy for Collectors' Car Meet, Two-Story Garage B visible in the background, 1964; *Valley Times*





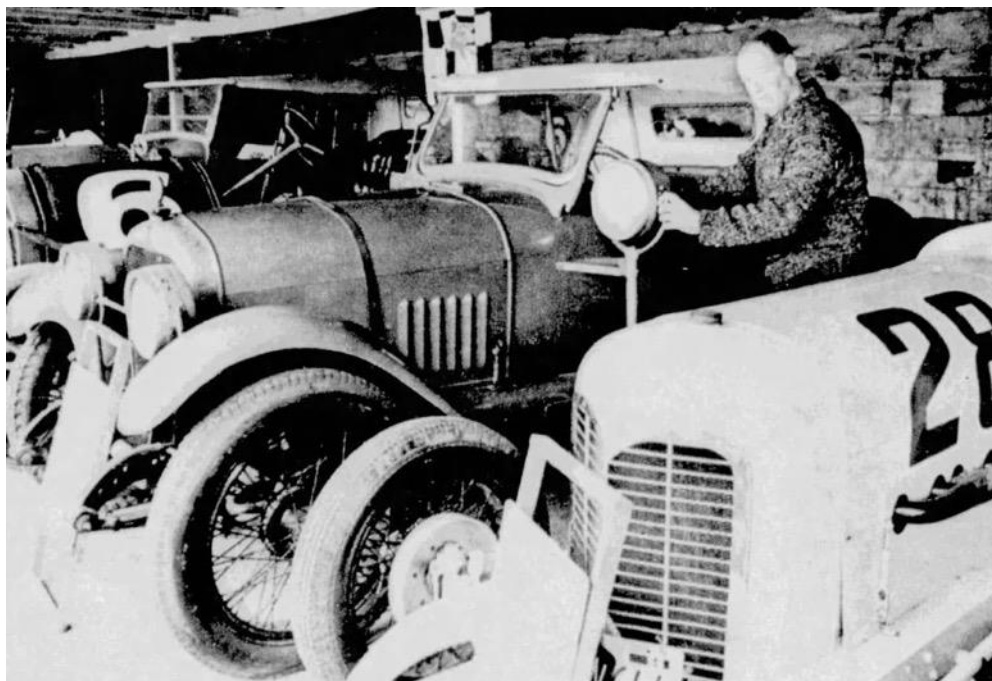
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**Figure 8** 1907 Baker Victoria being brought down ramp from Two-Story Garage A, 1964;  
*The Morning Union*



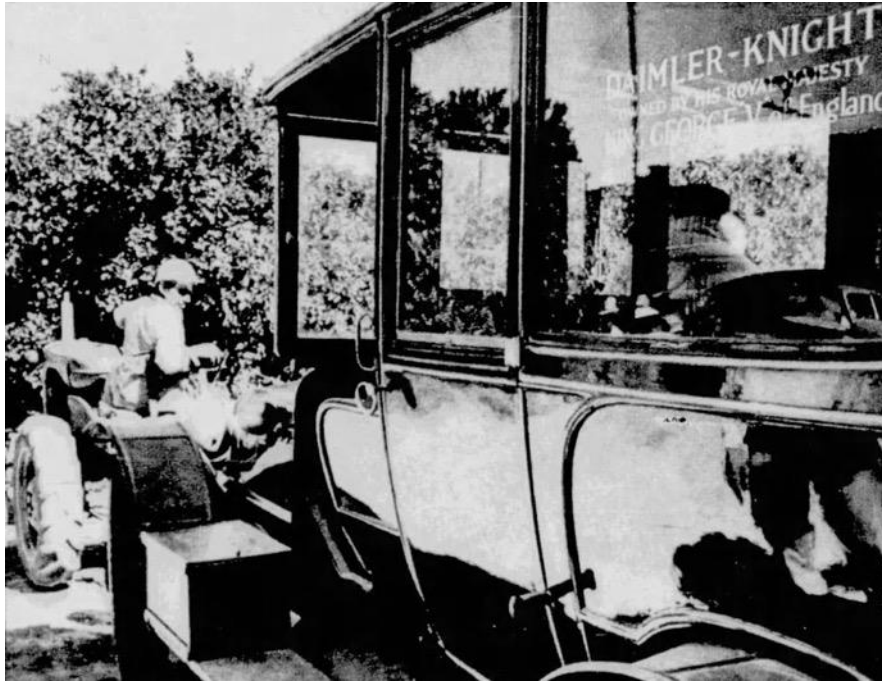
**Figure 9** Bothwell with cars inside Two-Story Garage or Storage Shed, 1964; *The Morning Union*



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**Figure 10** Tractor towing 1910 Daimler limousine owned by King George V, 1964; *The Morning Union*



**Figure 11** Tractor driving through Citrus Grove, 1998; *Los Angeles Times*



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**Figure 12** Train Shed, 2017; Museum of the San Fernando Valley



**Figure 13** West elevation of Two-Story Garage B, 2017; Rick Carey





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**Figure 14** Citrus Grove, 2019; City of Los Angeles Office of Historic Resources



**Figure 15** Primary north elevation of Main House, 2019; City of Los Angeles Office of Historic Resources



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**Figure 16** Primary east elevation of multi-Purpose Building, 2019; City of Los Angeles  
Office of Historic Resources



**Figure 17** Primary east elevation of multi-Purpose Building, 2019; City of Los Angeles  
Office of Historic Resources





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**Figure 18** South elevation of Two-Story Garage A with ramp to second floor visible, 2019;  
City of Los Angeles Office of Historic Resources



**Figure 19** East elevation of Two-Story Garage A, 2019; City of Los Angeles Office of Historic Resources



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**Figure 20** East (left) and north (right) elevations of Two-Story Garage A, 2019; City of Los Angeles Office of Historic Resources



**Figure 21** West elevation of Two-Story Garage B, 2019; City of Los Angeles Office of Historic Resources





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**Figure 22** West elevation of Train Station, 2019; City of Los Angeles Office of Historic Resources



**Figure 23** North covered patio at Train Station, 2019; City of Los Angeles Office of Historic Resources



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**Figure 24** North elevation of Train Shed with train tracks visible, 2019; City of Los Angeles Office of Historic Resources



**Figure 25** West elevation of Train Shed, 2019; City of Los Angeles Office of Historic Resources





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**Figure 26** North elevation of Storage Shed, 2019; City of Los Angeles Office of Historic Resources



**Figure 27** North elevation of Storage Sheds, note Quonset Huts located behind gate, 2019; City of Los Angeles Office of Historic Resources



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**Figure 28** East and north elevations of Storage Sheds, 2019; City of Los Angeles Office of Historic Resources



**Figure 29** East (left) and north (right) elevations of Train Station, 2022; Teresa Grimes





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**Photo 1** Bothwell Ranch from corner of Oakdale and Collier, view northeast



**Photo 2** Entrance to Bothwell Ranch from Oakdale, view east



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**Photo 3** East-west driveway from Oakdale, view west



**Photo 4** Citrus Grove from Oakdale, view east





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**Photo 5** Citrus Grove and fencing along Oakdale, view southeast



**Photo 6** Citrus Grove from Collier, view north





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**Photo 7** Citrus Grove from Collier, view north



**Photo 8** Citrus Grove and Main House from Collier, partial roof and chimney of Main House visible, view north



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**Photo 9** Storage Shed from Collier, view northeast



**Photo 10** Citrus Grove (left), Two-Story Garage A (center), and Storage Shed (right), view north





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**Photo 11** Storage Sheds (Quonset huts) from Collier, view northeast



**Photo 12** Storage Sheds from Collier, view northwest





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**Photo 13** Storage Shed from Collier, view northeast



**Photo 14** Two-Story Garage B from Collier, view northeast



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**Photo 15** Train Shed from Corbin, view southwest



**Photo 16** Bothwell Ranch from Corbin with Multi-Purpose Building visible at right, view south



Channel Law Group, LLP

April 3, 2025

Supplemental Appeal Documentation - 5300 Oakdale Avenue; VTT-83927-HCA-1A, and related cases VTT-83927-HCA, ZA-2023-2170-ZAD-ZV-ZAA, ZA-2023-2170-ZAD-ZV-ZAA-1A, ENV-2020-6762-EIR (Program EIR); Council File No. 25-0310

# ATTACHMENT E

California Code of Regulations

Title 14 Natural Resources

Division 1.5 – Department of Forestry and Fire Protection

Chapter 7 – Fire Protection

Subchapter 2 – State Minimum Fire Safe Regulations

Article 2 – Ingress and Egress

§ 1273.00 - Intent

§ 1273.01 - Width

§ 1273.02 - Road Surface

§ 1273.03 - Grades

§ 1273.04 - Radius

§ 1273.05 - Turnarounds

§ 1273.06 - Turnouts

§ 1273.07 - Road and Driveway Structures

§ 1273.08 - Dead-End Roads

§ 1273.09 - Gate Entrances



### **§ 1273.00 - Intent**

Roads, and Driveways, whether public or private, unless exempted under 14 CCR § [1270.03\(d\)](#), shall provide for safe access for emergency Wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a Wildfire emergency consistent with 14 CCR §§ [1273.00](#) through [1273.09](#).

### **§ 1273.01 - Width**

(a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

(b) All One-way Roads shall be constructed to provide a minimum of one twelve (12) foot traffic lane, not including Shoulders. The Local Jurisdiction may approve One-way Roads.

(1) All one-way roads shall, at both ends, connect to a road with two traffic lanes providing for travel in different directions, and shall provide access to an area currently zoned for no more than ten (10) Residential Units.

(2) In no case shall a One-way Road exceed 2,640 feet in length. A turnout shall be placed and constructed at approximately the midpoint of each One-way Road.

(c) All driveways shall be constructed to provide a minimum of one (1) ten (10) foot traffic lane, fourteen (14) feet unobstructed horizontal clearance, and unobstructed vertical clearance of thirteen feet, six inches (13' 6").

### **§ 1273.02 - Road Surface**

(a) Roads shall be designed and maintained to support the imposed load of Fire Apparatus weighing at least 75,000 pounds, and provide an aggregate base.

(b) Road and Driveway Structures shall be designed and maintained to support at least 40,000 pounds.

(c) Project proponent shall provide engineering specifications to support design, if requested by the Local Jurisdiction.

### **§ 1273.03 - Grades**

- (a) At no point shall the grade for all Roads and Driveways exceed 16 percent.
- (b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.

### **§ 1273.04 – Radius**

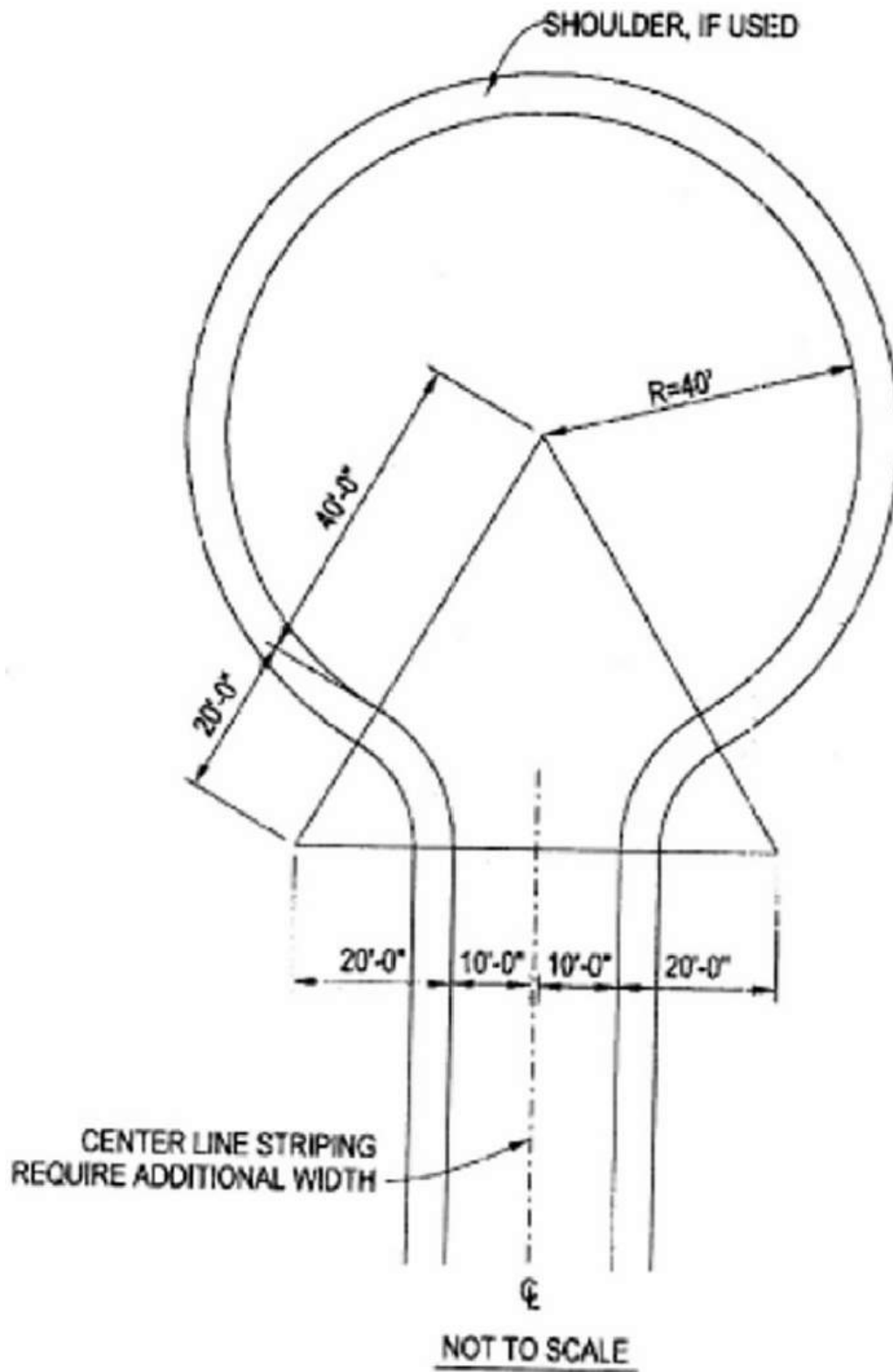
- (a) No Road or Road Structure shall have a horizontal inside radius of curvature of less than fifty (50) feet. An additional surface width of four (4) feet shall be added to curves of 50-100 feet radius; two (2) feet to those from 100-200 feet.
- (b) The length of vertical curves in *Roadways*, exclusive of gutters, ditches, and drainage structures designed to hold or divert water, shall be not less than one hundred (100) feet.

### **§ 1273.05 – Turnarounds**

- (a) Turnarounds are required on Driveways and Dead-end Roads.
- (b) The minimum turning radius for a turnaround shall be forty (40) feet, not including parking, in accordance with the figures in 14 CCR §§ [1273.05\(e\)](#) and [1273.05\(f\)](#). If a hammerhead/T is used instead, the top of the "T" shall be a minimum of sixty (60) feet in length.
- (c) Driveways exceeding 150 feet in length, but less than 800 feet in length, shall provide a turnout near the midpoint of the Driveway. Where the driveway exceeds 800 feet, turnouts shall be provided no more than 400 feet apart.
- (d) A turnaround shall be provided on Driveways over 300 feet in length and shall be within fifty (50) feet of the building.
- (d) Each Dead-end Road shall have a turnaround constructed at its terminus. Where parcels are zoned five (5) acres or larger, turnarounds shall be provided at a maximum of 1,320 foot intervals.

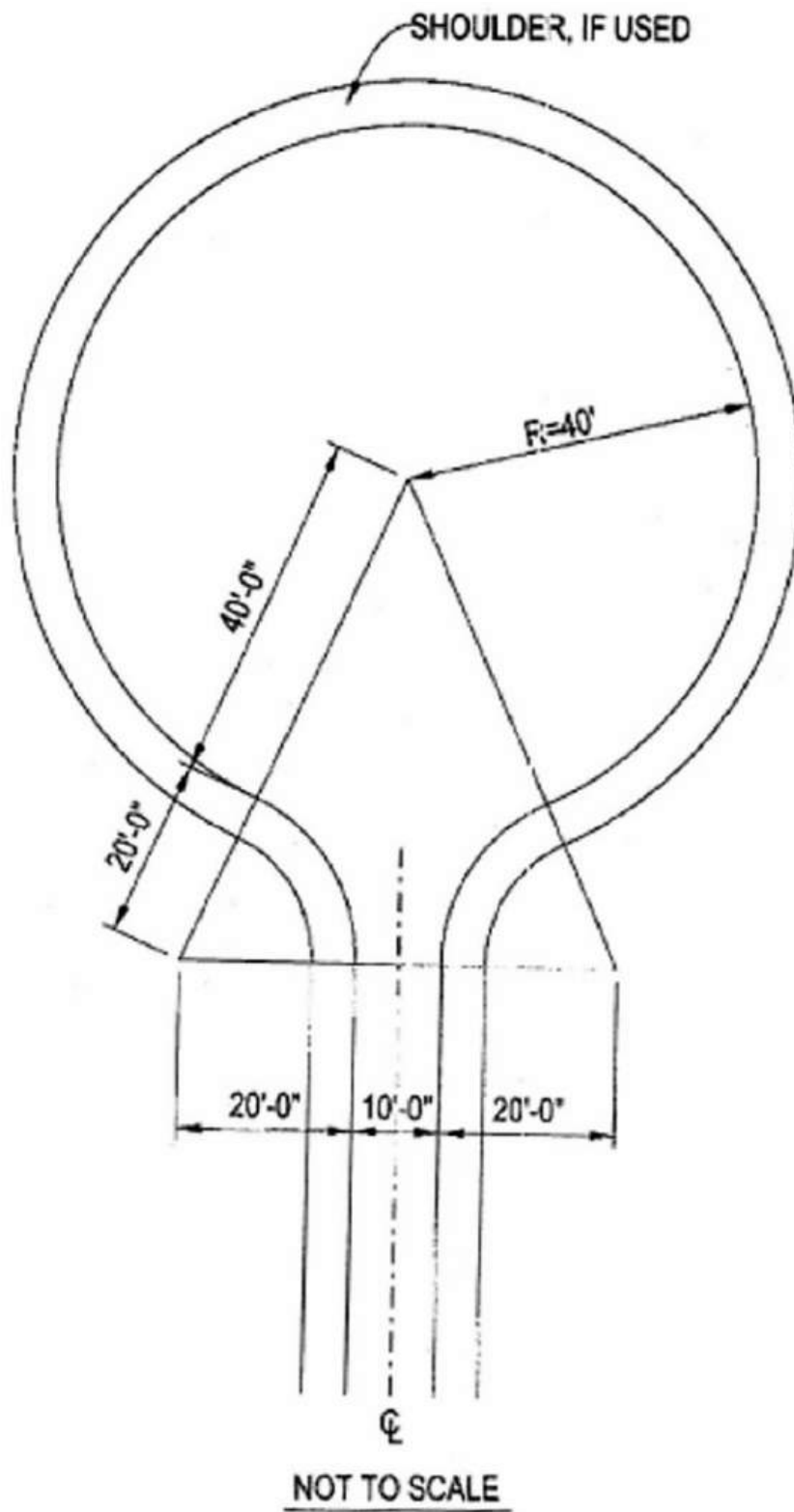
(e) Figure A. Turnarounds on roads with two ten-foot traffic lanes.

Figure A/Image 1 is a visual representation of paragraph (b).



(f) Figure B. Turnarounds on driveways with one ten-foot traffic lane.

Figure B/Image 2 is a visual representation of paragraph (b).



### **§ 1273.06 – Turnouts**

Turnouts shall be a minimum of twelve (12) feet wide and thirty (30) feet long with a minimum twenty-five (25) foot taper on each end.

### **§ 1273.07 - Road and Driveway Structures**

(a) Appropriate signing, including but not limited to weight or vertical clearance limitations, One-way Road or single traffic lane conditions, shall reflect the capability of each bridge.

(b) Where a bridge or an elevated surface is part of a Fire Apparatus access road, the bridge shall be constructed and maintained in accordance with the American Association of State and Highway Transportation Officials Standard Specifications for Highway Bridges, 17th Edition, published 2002 (known as AASHTO HB-17), hereby incorporated by reference. Bridges and elevated surfaces shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. Vehicle load limits shall be posted at both entrances to bridges when required by the local authority having jurisdiction.

(c) Where elevated surfaces designed for emergency vehicle use are adjacent to surfaces which are not designed for such use, barriers, or signs, or both, as approved by the local authority having jurisdiction, shall be installed and maintained.

(d) A bridge with only one traffic lane may be authorized by the Local Jurisdiction; however, it shall provide for unobstructed visibility from one end to the other and turnouts at both ends.

### **§ 1273.08 - Dead-End Roads**

(a) The maximum length of a Dead-end Road, including all Dead-end Roads accessed from that Dead-end Road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:

parcels zoned for less than one acre - 800 feet

parcels zoned for 1 acre to 4.99 acres - 1,320 feet

parcels zoned for 5 acres to 19.99 acres - 2,640 feet

parcels zoned for 20 acres or larger - 5,280 feet

All lengths shall be measured from the edge of the Road surface at the intersection that begins the Road to the end of the Road surface at its farthest point. Where a dead-end road crosses areas of differing zoned parcel sizes requiring different length limits, the shortest allowable length shall apply.

(b) See 14 CCR § [1273.05](#) for dead-end road turnaround requirements.

### **§ 1273.09 - Gate Entrances**

(a) Gate entrances shall be at least two (2) feet wider than the width of the traffic lane(s) serving that gate and a minimum width of fourteen (14) feet unobstructed horizontal clearance and unobstructed vertical clearance of thirteen feet, six inches (13' 6").

(b) All gates providing access from a Road to a Driveway shall be located at least thirty (30) feet from the roadway and shall open to allow a vehicle to stop without obstructing traffic on that Road.

(c) Where a One-way Road with a single traffic lane provides access to a gated entrance, a forty (40) foot turning radius shall be used.

(d) Security gates shall not be installed without approval. Where security gates are installed, they shall have an approved means of emergency operation. Approval shall be by the local authority having jurisdiction. The security gates and the emergency operation shall be maintained operational at all times.