

**Case No. ENV-2023-2488**  
**Attachment to CEQA Appeal**

On August 23, 2023, the Director of Planning improperly issued a letter of determination (“LOD”) for Case No. DIR-2023-2487-TOC-HCA in which he approved an approximately 39,717 square foot mixed use building that would be seven stories and nearly 90 feet tall (“Project”). The Project is located at 3801 S. Grand Avenue (the “Project Site”) and is adjacent to the I-110 Freeway. The Project application was submitted on April 11, 2023 – only about four months before the LOD was issued – and was accompanied by a wholly inadequate set of proposed findings prepared by the applicant consisting of two pages of entitlement findings and three pages of environmental findings. Such an extremely limited record for an over 39,000 square foot Project that is mostly commercial is inconsistent with the City’s typical processing procedures and raises substantial concerns that are compounded by the speed with which the City approved the Project with virtually no public engagement or notice.

As an interested party in the vicinity of the Project Site, Los Angeles Football Club (“LAFC”) is extremely concerned that based on the very limited record, the City’s review of the Project does not comply with the California Environmental Quality Act (“CEQA”). *LAFC is particularly concerned because the exact same developer is proposing another project on the same City block using the same architect and same consultants and the City’s analysis of the Project included no discussion of cumulative impacts associated with these related projects.* Accordingly, LAFC is submitting this appeal and requesting that the Project undergo additional analysis. Details on the appeal justification are provided below including how CEQA was incorrectly applied.

**I. THE PROJECT IS INELIGIBLE FOR A CLASS 32 EXEMPTION**

CEQA requires that the City must identify the significant environmental impacts of discretionary actions by conducting environmental review before making a determination on a project. (CEQA Guidelines § 15021.) The City found that a CEQA Class 32 Exemption applies to the Project, which exempts infill development within urbanized areas if the development meets certain criteria. Here, the City’s analysis in support of the Class 32 Exemption is entirely insufficient. The CEQA findings included in the LOD are not supported by substantial evidence, as the City failed to analyze any of the relevant impact areas and instead made conclusory statements regarding significance. The CEQA findings supporting the Class 32 Exemption are less than four pages long, while the City regularly requires far more evidence and up to hundreds of pages of analysis in support of Class 32 Exemptions for much smaller developments in less sensitive areas than the Project at issue here.<sup>1</sup> The Project’s CEQA findings are simply insufficient by the City’s own practices and CEQA requires much more.

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<sup>1</sup> For example, see Case No. ENV-2022-3162-CE, involving a Class 32 Exemption associated with the approval of a 29-unit, approximately 24,000-square-foot housing project. The Class 32 Exemption findings for that project are more than 400-pages long, including 16 appendices.

The extremely limited CEQA findings are substantially flawed and fail to adequately assess the Project's potentially significant impacts. The CEQA findings are inadequate for the following reasons, which are further detailed in subsequent sections of this document:

- **Air Quality**: The CEQA findings state that the City has developed air quality thresholds for analyzing projects, but does not include any discussion of any Project-specific air quality analysis. (LOD, p. 17.) Therefore, the CEQA findings entirely lack support to conclude that the Project would not result in significant impacts related to air quality.
- **Noise and Water**: In concluding that the “project will not have significant impacts on noise and water,” the CEQA findings merely list various Regulatory Compliance Measures (“RCM”) with which the Project must comply. (LOD, p. 17.) That statement is wholly unsupported by record evidence, as the record does not contain any empirical analysis of potential noise associated with Project construction or operation, nor any empirical analysis of the Project’s water-related impacts. Further, of the RCMs listed, only one is related to noise and none are related to water-related impacts. As a result, there is absolutely no evidence in the record that compliance with the identified RCMs will avoid significant impacts related to noise and water.
- **Traffic**: The CEQA findings go on to state that because the Project does not require a traffic study, per LADOT’s thresholds, that it will not result in any transportation-related impacts. Such cursory statements are not evidence or adequate analysis under CEQA, and the findings provide no discussion of the relevant LADOT thresholds or how the Project’s traffic compares to those thresholds. (*Id.*)
- **Inadequate Analysis of Class 32 Exceptions**: The CEQA findings also state, without justification or record evidence, that none of the exceptions to the Class 32 Exemption apply.
  - *Related to cumulative impacts*, the CEQA findings, without citing to any analysis, simply state that there are none despite the fact that the same developer has proposed another development project on the exact same City block.
  - *Related to historical resources*, the CEQA findings completely ignore the existence of historical resources in the vicinity of the Project Site. Specifically, in the vicinity of the Project Site SurveyLA identifies: the Los Angeles Memorial Coliseum Sign (“Coliseum Sign”) located just to the south of the Project Site; the Amistad hotel/apartment building built in 1924 located at 3745 S. Grand Avenue; a single-family residence built in 1905 located at 3822 S. Grand Avenue; and a collection of ornamental streetlights dating from the early-20th century along Grand Avenue.

Examined together, these flaws in the CEQA analysis supporting the Project’s approval are significant and demonstrate that the City’s rush to approve the Project was improper and at the expense of informing the public of the Project’s true environmental effects. The City must

complete more detailed environmental analyses to determine if the Project is in fact eligible for the Class 32 Exemption. The City also must evaluate the various exceptions beyond the surface-level conclusions contained within the CEQA findings. Unless and until the Project's CEQA analysis is augmented, the Class 32 Exemption is not adequately substantiated and cannot support the Project's approval. Accordingly, this appeal should be granted. Additional details regarding the inadequacy of the CEQA analysis are provided below.

#### **A. The Project May Result in Significant Air Quality Impacts**

The CEQA findings state that City staff has developed interim thresholds related to air quality, based on the California Emissions Estimator Model, guidance from AQMD staff, and published air quality studies. (LOD, p. 17.) The CEQA findings do not indicate whether the Project was analyzed pursuant to those interim thresholds or whether the City conducted any analysis of air quality impacts at all. Air quality impacts are of particular concern in Los Angeles County because the air basin is currently in non-attainment and exceeds air quality standards for ozone, lead, and particulate matter (PM-2.5).<sup>2</sup>

The Project involves the construction of a nearly 40,000-square-foot building that would be nearly 90-feet tall. (LOD, p. 9.) Building materials would include steel, cement, brick, glass, and corrugated metal. (LOD Exhibit A, sheets 4.01 and 4.04.) As such, construction likely would involve the use of heavy-duty equipment, including excavators, cranes, and welding equipment. All of the building materials and construction equipment would need to be transported to the Project Site, and all construction waste and debris would need to be transported away. Also, construction workers would drive to and from the Project Site on a daily basis over the course of Project development. The use of the construction equipment, hauling of materials and equipment, and worker trips to and from the construction site would result in emissions of particulate matter that contribute to air quality impacts, but the CEQA findings include no discussion of these potential impacts and no analysis of their significance.

Similarly, once constructed, the Project would include 40 new residences, along with nearly 30,000 square feet of new commercial uses. Daily travel to and from the Project, deliveries to residents and businesses, and the use of air conditioning and cleaning supplies all contribute to increased emissions that could result in significant air quality impacts, but none of these sources were analyzed.

The CEQA findings' cursory air quality analysis completely ignores the Project's potential to increase criteria pollutants, including ozone, lead, and particulate matter. Because the City failed to analyze potential construction and operational impacts, the air quality analysis is insufficient and fails to substantiate that the Project is eligible for the Class 32 Exemption.

#### **B. The Project May Result in Health Impacts**

Related to construction activities, the Project Site is located near sensitive receptors, including nearby residences. A construction health risk assessment must be prepared to identify

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<sup>2</sup> US EPA Green Book: California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants, available here: [https://www3.epa.gov/airquality/greenbook/anayo\\_ca.html](https://www3.epa.gov/airquality/greenbook/anayo_ca.html)

potential impacts to evaluate whether toxic air contaminants from construction activities may harm current residents. A health risk assessment would identify potential mitigation measures that would reduce construction-related contaminants to safe levels. Such mitigation could include the use of Tier 4 construction equipment to limit emissions. Until a health risk assessment is completed it is impossible to know what measures would be required to mitigate impacts to current residents below significant levels from construction activities. Related to Project operations, the Project Site is located adjacent to the I-110 Freeway and, because of its proximity to the freeway, diesel particulate matter emissions may result in potentially significant health risks to future occupants. Studies have found an increased risk of adverse health impacts and premature death associated with living near a major highway.<sup>3</sup> The CEQA findings fail to address these potential impacts. There is no evidence that the City conducted a health risk assessment to understand how long-term impacts associated with the freeway would impact future residents, or whether any mitigation is required to reduce these impacts to acceptable levels.

Because the City failed to address potential health impacts to future residents, there are no conditions or mitigation measures imposed on the Project that are designed to protect the health of future residents. At the very minimum, the Project should be required to exceed the building code standards for filtration system requirements to address health risks to future on-site occupants. (See LAMC § 99.04.504.6; Cal. Code Regs., tit. 24 § 160.2(b)(1)(C) (California Energy Code requiring filtration systems with at least a MERV-13 rating<sup>4</sup>.) However, because the Project Site is located so close to the freeway – *less than 150 feet from the heavily trafficked I-110* – the Project should be required to install an air filtration system with a MERV-16 or greater rating, especially as the building would house both residential and commercial uses. MERV-13 filters trap less than 75% of particles sized .3 to 1.0 microns, and by increasing the filtration system to MERV-16, 95% of these particles would be filtered.

Without a clear understanding of the health impacts to residents, it is impossible to evaluate the health impacts to future occupants and whether installation of filtration would adequately address those impacts or if additional measures are required. This is particularly important for a development containing residences that essentially are adjacent to the freeway. Thus, a health risk assessment must be completed to evaluate both the pre- and post-mitigation impacts associated with the long-term impacts of siting new housing units nearly on top of a busy freeway.

Additionally, the City failed to evaluate other health impacts to future Project residents, including health impacts resulting from loss of sleep associated with disturbances from two existing digital freeway signs in the immediate vicinity of the Project, loud freeway traffic, and sirens from emergency vehicles. It has been shown that long-term effects of sleep loss are

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<sup>3</sup> See University of Southern California Environmental Health Center, References: Living Near Busy Roads or Traffic Pollution; available here: <https://envhealthcenters.usc.edu/infographics/infographic-living-near-busy-roads-or-traffic-pollution/references-living-near-busy-roads-or-traffic-pollution>.

<sup>4</sup> MERV ratings signify an air filter's effectiveness at reducing airborne particles and contaminants. A filter's rating is determined by the particle size it is capable of trapping. As filters become better at improving indoor air quality, their MERV rating increases, ranging from 1 to 20.

associated with a wide range of deleterious health consequences including an increased risk of hypertension, diabetes, obesity, depression, heart attack, and stroke.<sup>5</sup>

Because the City failed to analyze potential health risk impacts to residents, the CEQA findings are insufficient and cannot substantiate the Class 32 Exemption.

### **C. The Project May Result in Significant Noise Impacts**

The CEQA findings state that with the implementation of the RCMs, the Project will not have significant noise impacts. (LOD, p. 17.) The only listed RCM that relates to noise requires compliance with the City of Los Angeles Noise Ordinance which, as described in the LOD, “prohibit[s] the emission or creation of noise beyond certain levels at adjacent uses *unless technically infeasible*.” (*Id.* [emphasis added].) Unlike the City’s Noise Ordinance, CEQA does not include an exception for technical infeasibility when determining the significance of noise impacts. Thus, reliance on the City’s Noise Ordinance is insufficient to ensure that the Project will not result in significant noise impacts.

For construction of the Project, the LOD and RCM fail to address the use of sound walls or construction equipment noise buffering. The installation of sound walls and use of equipment-specific buffers are feasible and efficient ways to reduce noise impacts from construction equipment to surrounding sensitive receptors. There are residences within close proximity to the Project Site, including residences across Grand Avenue and both north and south of the Project Site. To ensure that noise from construction is mitigated to the extent feasible to protect residents during Project construction, the City should require the installation of sound walls and the use of construction equipment noise buffering throughout the construction period.

In addition, the Project’s CEQA findings fail to analyze whether there would be an impact to future residents from noise levels surrounding the Project site. The Noise Element of the Los Angeles City General Plan provides that construction of new multi-family residential land uses in areas where average day-night exterior sound levels are 60 CNEL dB<sup>6</sup> or greater is acceptable “only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design.” (Los Angeles City General Plan, Noise Element, at Exhibit I.) Average exterior sound levels of 70 CNEL dB are normally unacceptable, and levels of 75 CNEL dB or greater are clearly unacceptable for construction of new multi-family residential uses. (*Ibid.*) Even at a distance of 300 feet, the noise level of heavy traffic is greater than 60 dB. (*Id.* at Exhibit H.) Accordingly, at minimum, a detailed analysis of noise mitigation is required to ensure compliance with the LAMC, which states that “interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room.” (LAMC § 91.1206.14.2; *see also* § 91.1206.15.4 [structures located where the CNEL exceeds 60 dB “shall require an acoustical analysis showing that the proposed design will limit exterior

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<sup>5</sup> Institute of Medicine (US) Committee on Sleep Medicine and Research, *Sleep Disorders and Sleep Deprivation: An Unmet Public Health Problem*, Washington (DC): National Academies Press (US) (2006); available here: <https://pubmed.ncbi.nlm.nih.gov/20669438/>.

<sup>6</sup> CNEL dB is a weighted measurement of decibels (dB) over a 24-hour period. (Los Angeles City General Plan, Noise Element, at Exhibit G.)

noise to the prescribed allowable interior level.”].) The CEQA findings omit the required empirical analysis of potential noise impacts and include no discussion of potential mitigation measures that could potentially reduce noise levels to below-significant levels within the Project’s residential units. To achieve the required noise levels within the Project’s interior, extensive insulation and noise-attenuating windows may be required.

Because the City failed to analyze potential construction and operational impacts, the noise analysis is insufficient and fails to substantiate that the Project is eligible for the Class 32 Exemption.

#### **D. The Project May Result in Significant Transportation Impacts**

The CEQA findings state the Project “does not exceed the threshold criteria established by LADOT for preparing a traffic study,” but includes no further information about what, if any, substantive analysis was completed to evaluate any impacts associated with transportation. While some transportation impacts are evaluated based on the number of anticipated trips, some of the threshold questions cannot be addressed by simply relying on a threshold for a traffic study. For example, the CEQA findings fail to detail whether the Project is in conflict with any program, plan, ordinance or policy addressing the circulation system. (CEQA Guidelines, Appendix G.) Further, there is no analysis as to whether the Project will result in adequate emergency access. (*Id.*)

Most significantly, the CEQA findings fail to address whether the Project will result in increased hazards due to geometric design features or incompatible uses. (*Id.*) This question is of particular importance because of the Project Site’s proximity to the freeway and the nearby digital signage on the I-110 Freeway that the Project’s development will visually impede. (See Visual Simulations, Attachment A.) Specifically, the Project would partially block existing views of digital signage for drivers on the freeway, which would change the way drivers read the digital messaging and interact with the signs. This could in turn result in hazardous traffic conditions resulting from drivers attempting to see portions of the freeway signs that will be obstructed in order to see the complete messaging on the signs. An analysis of potential impacts to drivers on the freeway associated with the modified views of the existing signage therefore should be prepared to evaluate whether the Project’s construction causes a new hazardous condition to drivers on the freeway.

Because the City ignored important thresholds in its cursory review of potential impacts to transportation, the analysis is insufficient and fails to substantiate that the Project is eligible for the Class 32 Exemption.

#### **E. The Analysis Failed to Address Potentially Significant Historic Impacts**

The CEQA findings’ discussion of the historical resource exception only addresses the issue of on-site historical resources, and fails to address impacts to any surrounding historical resources. The CEQA findings state only that “[t]he project site has not been identified as a historic resource . . . and was not found to be a potential historic resource based on the City’s HistoricPlacesLA website of SurveyLA, the citywide survey of Los Angeles.” (LOD, p. 18.)

This is a substantial and concerning omission given the proximity of several identified historic resources in the Project's immediate vicinity.

SurveyLA conducted a historic resource survey in 2012 and then again in 2015 throughout the Southeast Los Angeles Community Plan area and identified several resources that appear to be impacted by the Project.<sup>7</sup> As noted above, the Project is located in the vicinity of the Coliseum Sign located just to the south of the Project Site; the Amistad hotel/apartment building built in 1924 located at 3745 S. Grand Avenue, directly across 38th Street from the Project Site; a single-family residence built in 1905 located at 3822 S. Grand Avenue, just south of the Project Site across Grand Avenue; and a collection of ornamental streetlights dating from the early-20th century along Grand Avenue including one ornamental streetlight along the Project Site's sidewalk. (See Historical Memo, Attachment B.) These have all been identified as part of SurveyLA and all will be affected by the Project in some manner, but the City's record – including the CEQA findings – fail to even mention that the Project is located in close proximity to any of these identified historical resources. Notably none of these resources were identified on the Environmental Assessment Form filed with the Project's application and the applicant incorrectly answered “no” when asked if there are any historical resources adjacent to the Project Site despite the fact that an ornamental streetlight is along the Project Site's sidewalk and the Amistad is located directly across the street. (EAF § C.) Per the CEQA Guidelines, “[a] categorical exemption shall not be used for a project which may cause a substantial and adverse change in the significance of a historical resource.” (CEQA Guidelines § 15300.2.f.) An analysis must be conducted to evaluate whether the Project may cause a substantial adverse change to the significance of one or more of the identified historical resources surrounding the Project to determine eligibility under the Class 32 Exemption. Specifically, regarding the ornamental streetlight along the Project Site's sidewalk, there is simply no information in the record regarding whether this streetlight could be impacted by the Project design and related streetscape work or any measures to ensure that the streetlight is not damaged during Project construction and that there are no physical conflicts with the streetlight during Project operations.

In addition, regarding the Coliseum Sign, there are significant concerns that the siting of a 90-foot tall building just north of the Coliseum Sign could impact the significance of this iconic monument because of impacts on views to the Coliseum Sign. SurveyLA assigned the Coliseum Sign a status code of 5S3, or “appears to be individually eligible for local listing or designation through survey evaluation.” The Coliseum Sign is one of a handful of extant structures specifically designed and constructed for the 1984 Olympic Games, which represent an important event of national, state, and local history. Therefore, the Coliseum Sign appears significant under Historical-Cultural Monument Criterion 1.<sup>8</sup>

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<sup>7</sup> See SurveyLA, Supplemental Historic Resources Survey Report Industrial Zone Properties in the Southeast Los Angeles Community Plan Area (Dec. 2015), available here: [http://13.56.149.169/documents/fileuploads/files/SurveyLASoutheastLosAngeles\\_IndustrialReport.pdf](http://13.56.149.169/documents/fileuploads/files/SurveyLASoutheastLosAngeles_IndustrialReport.pdf).

<sup>8</sup> LAMC § 22.171.7 Criterion 1 states that any site or structure of particular historic or cultural significance to the City of Los Angeles may be designated a Historical-Cultural Monument if it is “identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.”

It is the physical form and design of the Coliseum Sign, as well as the readability of its text displays, that together convey the Coliseum Sign's historic significance. (See Historical Memo, Attachment B.) Therefore, any interruption in views of the Coliseum Sign may significantly reduce the sign's ability to convey its historic significance, resulting in a material impairment of the Coliseum Sign's historical significance. (CEQA Guidelines § 15064.5(b)(2).)

Because the City simply ignored potential impacts to numerous historical resources in the Project's vicinity, the conclusory statement related to historical resources is insufficient and cannot substantiate that the Project eligible for a Class 32 Exemption.

#### **F. The Analysis Failed to Address Potentially Significant Cumulative Impacts**

The CEQA findings state that “[t]here were no similar projects identified within a 500-foot radius of the subject site” and as a result “there is no evidence to show a cumulative impact of successive projects of the same type in the same place.” (LOD, p. 18.) Unfortunately, these statements are demonstrably false and render the CEQA findings inadequate. On the same City block, less than 500 feet away from the Project Site, the same applicant, Hamid Razipour, is proposing another project consisting of residential and commercial uses located at 3851 S. Grand Avenue. (Case Nos. DIR-2023-5190; ENV-2023-5191.) That project consists of another approximately 12,616 square feet of development in a building that will be over 65 feet tall. That other project uses the same architect and project consultants as this Project, but Mr. Razipour's other development that is currently under City review isn't even mentioned in any of the Project documents or the Project's approval. This other project, in conjunction with the Project, has the potential to result in cumulatively significant impacts and must be analyzed to ensure that there are no cumulative impacts that would affect the City's application of the Class 32 Exemption.

CEQA requires that a public agency review the entirety of a planned project before any portion is authorized. The CEQA Guidelines define a project as “the whole of an action, which has a potential for resulting in either a direct physical change to the environment, or a reasonably foreseeable indirect physical change in the environment” (Guidelines §15378 subd. (a)), and require that “all phases of project planning, implementation, and operation” must be considered (Guidelines, §15063 subd. (a)(1)). Here, the City improperly piecemealed a larger project by analyzing one component in a vacuum, without reference to the broader development plans of the same developer for a single City block.

Because the Project and Mr. Razipour's related proposed development at 3851 S. Grand Avenue have the potential to result in cumulatively significant impacts to air quality, noise, transportation, water quality, historical resources, and other impacts, further analysis is required to substantiate that the Project will not result in any cumulative impacts. Significantly, as shown in the Visual Simulations included as Attachment A, the cumulative projects would result in significant view blockage of the historic Coliseum Sign as viewed from the I-110 Freeway. The Project approval includes absolutely no analysis of this potential impact to a historic resource.

Because the City's cumulative impacts analysis is insufficient, it cannot substantiate that the Project is eligible for the Class 32 Exemption.

## **II. CONCLUSION**

As an interested party in the surrounding neighborhood, LAFC is concerned that the Project was approved without an adequate CEQA review and LAFC respectfully requests that the City Council grant this appeal and require that the Director process the Project consistent with CEQA's requirements.

# **ATTACHMENT A**

3801 S. Grand Avenue Project

3851 S. Grand Avenue Project



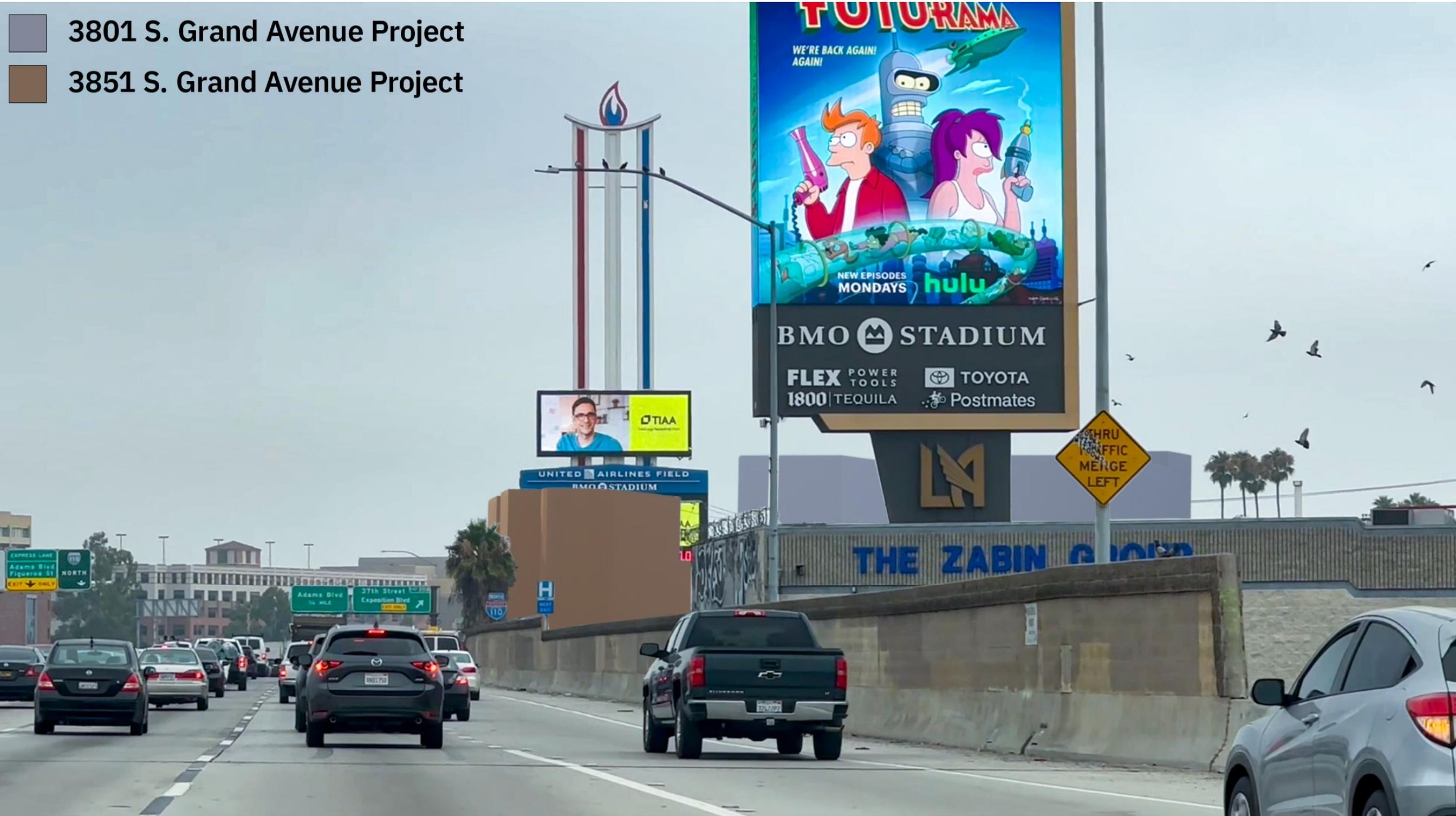
 3801 S. Grand Avenue Project

 3851 S. Grand Avenue Project



3801 S. Grand Avenue Project

3851 S. Grand Avenue Project



# **ATTACHMENT B**

# HISTORIC RESOURCES GROUP

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Pasadena, CA 91105

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## MEMO

TO: LATHAM & WATKINS LLP

ATTN: LAUREN E. PAULL

DATE: SEPTEMBER 6, 2023

## Introduction

Per your request, Historic Resources Group has investigated identified historic resources in the near vicinity of two proposed development projects located at 3801 S. Grand Avenue and 3851 S. Grand Avenue in the City of Los Angeles. This memorandum identifies historic resources in the near vicinity of the two sites.

## Methodology

Context and survey findings from SurveyLA, the City of Los Angeles' city-wide survey effort, were consulted to locate any potential historic resources identified by SurveyLA in the near vicinity of the two sites of investigation. The California Historic Resources Inventory (last updated 2011) was also consulted. Identification of any additional potential resources is based on a review of the relevant historic contexts and an analysis of the eligibility criteria and integrity thresholds for listing in the National Register of Historic Places and the California Register of Historical Resources, and for designation as a Los Angeles Historic-Cultural Monument.

## Historic Resources Investigation

### SITE LOCATIONS

The subject sites are located at opposite ends of a block bounded by 38<sup>th</sup> Street to the north, 39<sup>th</sup> Street to the south, S. Grand Avenue to the east and State Route 110 to the west. 3801 S. Grand Avenue is located at the southwest corner of S. Grand Avenue and W. 38<sup>th</sup> Street; 3851 S. Grand Avenue is located at the northwest corner of S. Grand Avenue and W. 39<sup>th</sup> Street. Both

sites are currently occupied by open paved yards surrounded by metal chain-link fencing. Existing buildings occupy the parcels between the two sites. No listed or designated historic resources are located on either site.

## **HISTORIC RESOURCES IN THE NEAR VICINITY**

The Southeast Los Angeles Community Plan Area, which includes both 3801 and 3851 S. Grand Avenue, was subject to historic resources survey by SurveyLA in 2012.<sup>1</sup> Parcels zoned as industrial within the Southeast Los Angeles Community Plan Area were later surveyed by SurveyLA in 2015.<sup>2</sup> Four resources in the vicinity of the 3801 and 3851 S. Grand Avenue sites were identified by SurveyLA as eligible for historic designation. These are as follows:

### **South Grand Avenue Streetlights**

SurveyLA identified a collection of ornamental streetlights dating from the early-20<sup>th</sup> century located on South Grand Avenue between 39<sup>th</sup> Street and Jefferson Boulevard. The streetlights were identified as historically significant as an “excellent collection of early ornamental streetlights in Southeast Los Angeles.” The South Grand Avenue Streetlights were assigned a status code of 5S3 or “Appears to be individually eligible for local listing or designation through survey evaluation.” Field observation of the streetlights on South Grand Avenue between 39<sup>th</sup> Street and Jefferson Boulevard confirms that they are the double-lantern model streetlights installed during the 1920s.

### **Memorial Coliseum Sign**

SurveyLA identified the Memorial Coliseum sign located at 3843 S Grand Avenue as eligible for local listing. The Memorial Coliseum sign was found significant for its association with the 1984 Olympic Games. The SurveyLA finding indicates that the Memorial Coliseum sign “appears to be eligible for local designation only and may not meet significance thresholds for National Register and California Register eligibility.” The National Register Criteria for Evaluation excludes properties that achieved significance within the past fifty years unless they are of *exceptional importance*. Fifty years is a general estimate of the time needed to develop historical perspective and to evaluate significance.<sup>3</sup> Under Criteria Consideration G a property achieving significance within the past fifty years is eligible if it is of *exceptional importance*. The phrase “exceptional importance” may be applied to the extraordinary importance of an event or to an entire category of resources so fragile that survivors of any age are unusual.

Because the Memorial Coliseum sign was constructed in 1984 and is 39 years old at the time of this memorandum, it is less than 50 years old. SurveyLA uncovered no evidence to suggest that the sign is of exceptional importance as would be necessary to satisfy Criterion Consideration G. Therefore, the Memorial Coliseum sign was not found eligible for the National Register. Although criteria for the California Register are somewhat less exacting in terms of age thresholds, it is likely that the sign was not found eligible for the California Register for similar reasons. In addition, the Memorial Coliseum sign underwent some alteration for maintenance and upgrades in 2015. These alterations included replacement of all internal lighting components utilizing LED lights; replacement of the lettering spelling out ‘Los Angeles

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<sup>1</sup> GPA Consulting, March 2012

<sup>2</sup> GPA Consulting, December 2015

<sup>3</sup> U.S. Department of the Interior, National Park Service,  
*National Register Bulletin 15: How to Apply the National*

*Register Criteria for Evaluation*,  
[http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15\\_7.htm#crit](http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_7.htm#crit) (accessed July 18, 2018).

Memorial Coliseum and Sports Arena' with backlit, white LED illumination; replacement of the upper and lower advertising spaces with LED display technology; installation of LED technology for the Coliseum, Arena and Exposition Park display area; and installation of LED technology for the Time and Temperature displays. The entire cabinet and column structure was also repainted utilizing the original 1984 colors.<sup>4</sup>

Section 22.171.7 of Article 1, Chapter 9, Division 22 of the City of Los Angeles Administrative Code defines a Historic-Cultural Monument as “any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles.” A proposed Monument may be designated by the City Council upon the recommendation of the Cultural Heritage Commission if it meets at least one of the following criteria:

- Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community;
- Is associated with the lives of historic personages important to national, state, city, or local history; or
- Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

The Memorial Coliseum sign was assigned a status code of 5S3 or "Appears to be individually eligible for local listing or designation through survey evaluation" by SurveyLA. The sign is one of a handful of extant structures specifically designed and constructed for the 1984 Summer Games which was an important event of national, state, and local history. Therefore, the Memorial Coliseum sign appears significant under Historical-Cultural Monument Criterion 1. Despite some alterations, the Memorial Coliseum sign retains its original form and structure from 1984 and replacement display components have maintained the original display area dimensions. It is the physical form and design of the Memorial Coliseum sign, as well as the readability of its text displays, that together convey the sign's historic significance. Therefore, the sign does appear eligible for local designation as a City of Los Angeles Historic-Cultural Monument.

### **3745 S. Grand Avenue, Amistad/Zobelein Hotel**

Located on the west side of S. Grand Avenue at the northwest corner of S. Grand Avenue and 38<sup>th</sup> Street, this four-story Renaissance Revival building sits directly across 38<sup>th</sup> Street from the 3801 S. Grand Avenue site. It was identified by SurveyLA as historically significant for “an excellent example of a residential hotel with Renaissance Revival stylistic elements in Southeast Los Angeles.” 3745 S. Grand Avenue was assigned status codes of 3S or “Appears eligible for the National Register as an individual property through survey evaluation;” 3CS or “Appears eligible for the California Register as an individual property through survey evaluation;” and 5S3 or “Appears to be individually eligible for local listing or designation through survey evaluation.”<sup>5</sup>

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<sup>4</sup> Furin, May 28, 2015.

<sup>5</sup> GPA Consulting, December 2015

### **3822 S. Grand Avenue**

Located on the east side of S. Grand Avenue mid-block between W. 38<sup>th</sup> Street and W. 39<sup>th</sup> Street, this 1905 two-story Craftsman house was identified by SurveyLA as historically significant for “representing the earliest pattern of development in the area; a rare remaining example of an intact turn-of-the-century residence in Southeast Los Angeles.” 3822 S. Grand Avenue was assigned status codes of 3S or “Appears eligible for the National Register as an individual property through survey evaluation;” 3CS or “Appears eligible for the California Register as an individual property through survey evaluation;” and 5S3 or “Appears to be individually eligible for local listing or designation through survey evaluation.”<sup>6</sup>

*An aerial photo showing the location of historic resources is included in Attachment A. Resources as documented by SurveyLA are included in Attachment B.*

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<sup>6</sup> GPA Consulting, December 2015

## Sources

GPA Consulting. "Historic Resources Survey Report: Southeast Los Angeles Community Plan Area." Prepared for the City of Los Angeles Department of City Planning Office of Historic Resources, March 2012.

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**ATTACHMENT A: ADJACENT HISTORIC RESOURCES**

Development sites shown in red. Historic resources shown in yellow.



**ATTACHMENT B: SURVEYLA FINDINGS**



Address: Figueroa Street between 18th Street and Adams Boulevard  
 Name: South Figueroa Street Streetlights  
 Year built: 1920  
 Architectural style: Not Applicable

**Context 1:**

Context:	Public and Private Institutional Development, 1850-1980
Sub context:	Government Infrastructure and Services, 1850-1980
Theme:	Public Works, 1900-1980
Sub theme:	Street Lights and the Bureau of Street Lighting, 1900-1980
Property type:	Institutional - Infrastructure
Property sub type:	Street Light(s)
Criteria:	A/C;1/3;1/3
Status code:	5S3
Reason:	Excellent collection of early ornamental streetlights in Southeast Los Angeles. Streetlights with double lantern, "UM 1906" style, located along both sides of Figueroa Street between 18th Street on the north and Adams Boulevard on the south. In the mid-1920s, hundreds of these streetlights were installed in downtown Los Angeles, extending outward along several major streets. These streetlights appear to meet local criteria only and may not meet significance thresholds for National Register of California Register eligibility.



Address: South Grand Avenue between 39th Street and Jefferson Boulevard  
 Name: South Grand Avenue Streetlights  
 Year built: 1920  
 Architectural style: Not Applicable

**Context 1:**

Context:	Public and Private Institutional Development, 1850-1980
Sub context:	Government Infrastructure and Services, 1850-1980
Theme:	Public Works, 1900-1980
Sub theme:	Street Lights and the Bureau of Street Lighting, 1900-1980
Property type:	Institutional - Infrastructure
Property sub type:	Street Light(s)
Criteria:	A/C;1/3;1/3
Status code:	5S3
Reason:	Excellent collection of early ornamental streetlights in Southeast Los Angeles. Streetlights with double lantern located along both sides of South Grand Avenue between Jefferson Boulevard on the north and 39th Street on the south. In the mid-1920s, hundreds of these streetlights were installed in downtown Los Angeles, extending outward along several major streets. These streetlights appear to meet local criteria only and may not meet significance thresholds for National Register of California Register eligibility.



Primary Address: 3843 S GRAND AVE  
 Other Address: 3843 1/2 S GRAND AVE  
 3845 S GRAND AVE  
 3845 1/2 S GRAND AVE  
 Name:  
 Year built: 1984  
 Architectural style: Modern, Late

**Context 1:**

Context:	Commercial Development, 1850-1980
Sub context:	No Sub-context
Theme:	Commercial Signs, 1906-1980
Sub theme:	Pylons, Poles, Stantions, and Billboards, 1920-1980
Property type:	Commercial - Sign
Property sub type:	Freestanding Tower
Criteria:	A/1/1
Status code:	5S3
Reason:	Significant as a large sign advertising a major recreational facility in Los Angeles; associated with the 1984 Olympic Games. This sign appears to meet local criteria only and may not meet significance thresholds for National Register of California Register eligibility.



Primary Address: 1800 S HILL ST  
 Other Address: 156 W 18TH ST  
 162 W 18TH ST  
 1802 S HILL ST  
 1804 S HILL ST  
 1806 S HILL ST  
 1808 S HILL ST  
 Name: Talon Zipper Company  
 Year built: 1947  
 Architectural style: Moderne, Late

**Context 1:**

Context:	Industrial Development, 1850-1980
Sub context:	Manufacturing for the Masses, 1883-1989
Theme:	Garments and Textiles, 1896-1980
Sub theme:	No SubTheme
Property type:	Industrial
Property sub type:	Garment Factory
Criteria:	A/1/1 & C/3/3
Status code:	3S;3CS;5S3
Reason:	Excellent example of a factory associated with the garment industry. Exemplifies the distinctive design features of its type.



Primary Address: 3745 S GRAND AVE  
 Other Address: 411 W 38TH ST  
 3739 S GRAND AVE  
 Name: Zobelein Hotel  
 Year built: 1924  
 Architectural style: Renaissance Revival

**Context 1:**

Context:	Commercial Development, 1850-1980
Sub context:	No Sub-context
Theme:	Hotels, 1880-1980
Sub theme:	No SubTheme
Property type:	Commercial - Lodging
Property sub type:	Apartment Hotel
Criteria:	A/1/1 & C/3/3
Status code:	3S;3CS;5S3
Reason:	An excellent example of an apartment hotel with Renaissance Revival stylistic elements in Southeast Los Angeles.



Primary Address: 3822 S GRAND AVE  
 Name:  
 Year built: 1905  
 Architectural style: Craftsman

**Context 1:**

Context:	Residential Development and Suburbanization, 1850-1980
Sub context:	No Sub-context
Theme:	Early Residential Development, 1880-1930
Sub theme:	Early Single-Family Residential Development, 1880-1930
Property type:	Residential
Property sub type:	Single-Family Residence
Criteria:	A/1/1
Status code:	3S;3CS;5S3
Reason:	Significant as representing the earliest pattern of development in the area; a rare remaining example of an intact turn-of-the-century residence in Southeast Los Angeles.