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Public Comments Not Uploaded Council File No. 25-0310: Applicant Response to Appeal Letter (VTT-83927 & ENV-2020-6762-EIR; ZA-2023-2170-ZAD-ZV-ZAA)

'Alison Martinez' via Clerk-PLUM-Committee <clerk.plumcommittee@lacity.org>

Tue, Apr 22, 2025 at 8:01 AM

Reply-To: clerk.plumcommittee@lacity.org

To: "clerk.plumcommittee@lacity.org" <clerk.plumcommittee@lacity.org>

Good morning,

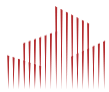
Thank you for your email—the file is attached. Please let me know if you have trouble accessing it.

Best,

Alison

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Associate



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5300 Oakdale - Response to Channel Law Group's Appeal Letter with Exhibits (4-2-25).pdf
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April 2, 2025

VIA EMAIL

Planning and Land Use Committee
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Re: Council File: 25-0310 : Response to Channel Law Group’s Appeal of 5300 Oakdale Avenue Project (Case Nos. VTT-83927 & ENV-2020-6762-EIR; Related Case No. ZA-2023-2170-ZAD-ZV-ZAA)

Dear Chair Blumenfield and PLUM Members:

We are writing on behalf of Oakdale Estates, LLC (“Applicant”) regarding its proposed project at 5300 Oakdale Avenue (“Property”), an approximately 13.29-acre site located at the northeast corner of Oakdale Avenue and Collier Street in the Encino-Tarzana area of Los Angeles (“City”). The proposed project (“Project”) consists of 21 residential dwelling units (plus 19 accessory dwelling units) on the approximately 9.14-acre western portion of the Property, and an open space/ preservation area (“Preservation Area”) on the approximately 4.15-acre eastern portion of the Property. In conjunction with the Project, the Preservation Area would be donated to a conservation organization such as the Santa Monica Mountains Conservancy/Mountain Recreation Conservation Authority (“MRCA”) to remain as open space in perpetuity.

This letter responds to the March 17, 2025 appeal (“Appeal”) submitted by Channel Law Group, on behalf of West Valley Alliance for an Optimal Living (“Appellant”), objecting to the City’s decision to approve Vesting Tentative Tract Map VTT-83297 (“VTTM”) and to rely upon the Program Environmental Impact Report (“EIR”) for the Citywide Housing Element 2021-2029 and Safety Element Updates (“Housing Element EIR”) (ENV-2020-6762-EIR) as the environmental clearance document for the Project under the California Environmental Quality Act (“CEQA”). This letter responds to all of the claims made by the Appellant in the Appeal and to relevant claims in a March 21, 2025 “Supplemental Letter” submitted in the related Zoning Administrator (“ZA”) case for this matter.

The City’s approval of the VTTM and CEQA clearance are supported by substantial evidence and the Appeal has no merit. The Project is supported by a broad coalition of community members, including both the Woodland Hills-Warner Center and the Tarzana Neighborhood Councils, local neighbors, the MRCA, and elected officials. Even so, the Appellant (who does not live near the Property) is trying to stop this modest housing project; this is the third appeal filed by this Appellant (who is also the only appellant of this Project). The Appellant’s attempts to impede the Project at every opportunity is particularly

disheartening given the fact that the Project would result in new housing units at the Property at a time that the City's housing crisis has been made significantly worse by the destruction of more than 16,000 homes and other structures in the recent devastating fires. For all of the reasons set forth herein, we respectfully request that the City Council **deny** the appeal.

I. Project History and Background

On December 20, 2024, the Deputy Advisory Agency approved a VTTM for the Project (VTT-83927) and similarly found that the Project was within the scope of the Housing Element EIR. On December 20, 2024, the ZA also approved a ZA Determination, Variance, and ZA Adjustment for the Project (ZA-2023-2170-ZAD-ZV-ZAA) and determined the Project was within the scope of environmental review performed by the certified Housing Element EIR. On January 5, 2025, the Appellant submitted appeals of the VTTM approval ("VTTM Appeal") and the ZA entitlement approvals ("ZA Appeal") to the City Planning Commission ("CPC"). On March 7, 2025, the City issued a Letter of Determination ("VTTM LOD") stating that the CPC failed to act on the VTTM within 45 days as required by Government Code § 66542.5(c)(1), resulting in a denial of the VTTM Appeal. On March 17, 2025, Appellant filed the subject Appeal, and we submitted a rebuttal of the Appeal on March 20, 2025 (attached hereto as Exhibit A). The Appellant also filed a Supplemental Letter ("Supplemental Letter") in the ZA Appeal case.¹ This letter addresses the relevant issues in the Supplemental Letter.

As discussed herein, contrary to the assertions by Appellant, the Advisory Agency did not commit any error or abuse of discretion in approving the Project, and substantial evidence supports the City's CEQA findings that 1) the Project is within the scope of the Housing Element EIR pursuant to CEQA Guidelines Section 15168, 2) the Project will not have any significant environmental effects not examined in the Housing Element EIR, 3) the Housing Element EIR adequately described the Project under CEQA, 4) pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162, no substantial changes to the project analyzed in the Housing Element EIR have occurred, no changed circumstances have occurred, nor is there any new information of substantial importance, and 5) all applicable mitigation measures have been imposed on the Project. Therefore, we respectfully request that the City Council deny the Appeal and affirm the approval of the VTTM.

II. The Project Description Accurately Describes the Proposed Project

The Supplemental Letter alleges that the Project description "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."² Appellant's own letter undermines the credibility of this statement. The Appeal and the Supplemental Letter quote the Project description contained in the City's hearing notice, which states that the Project involves "the removal of existing structures and a portion of an existing orchard."³ To claim that use of the word "removal" does not connote destruction is simply specious. Had the Project included relocation of trees and buildings, it would have stated so. In the context of a new development, there is little doubt that removal equates to destruction. The Project

¹ We anticipate that Appellant will also file an appeal of the ZA LOD since the City Planning Commission did not act within 75 days, as required by LAMC § 13.B.2.2.G.4. As of the date of this letter, the City has not yet issued an LOD memorializing the denial of the ZA LOD for failure to act.

² Supplemental Letter, p. 3.

³ *Id.*

description, therefore, provides an accurate summary of the proposed Project, including the removal and destruction of the existing structures and orchard. Appellant's very first argument is frivolous and without merit.

III. The Hearing Notice and Staff Report Sufficiently Disclosed Reliance on the Housing Element EIR

In another effort to find fault where none exists, the Supplemental Letter alleges that the City erred because it failed to provide the public with the "title of the Program EIR."⁴ There was nothing improper about the City's notice. CEQA does not require that a public review process occur when it determines if a project is within the scope of a previously prepared EIR.⁵ As required by CEQA Guidelines 15168(e), the City properly provided notice that the Project is "within the scope" of the Housing Element EIR and that the Housing Element EIR "adequately described" the activity for the purposes of CEQA. That is all that was required by law and that is what was provided by the City.

Further, the Supplemental Letter concedes that the hearing notice for the Advisory Agency hearing included the case number for the Housing Element EIR, which provided the necessary information for Appellant to find a copy of the Housing Element EIR. Indeed, the Supplemental Letter includes a screenshot of the Department of City Planning webpage where the case number (ENV-2020-6762-EIR) can be entered to obtain details about the Housing Element EIR, including the fact it is the Program EIR prepared for the City's Housing Element update. The City's hearing notice and staff report included the accurate case number reference so that the public could find and evaluate the full Housing Element EIR—this is standard practice for the City. It is not an attempt to make the public "assume that they were relying on a more applicable Program EIR." Appellant has not provided any legal authority that the City's notice was in error, nor could it, as it met all legal requirements.

IV. The Project is Within the Scope of the Housing Element EIR

A. The CEQA Guidelines Explicitly Authorize Reliance on Program EIRs such as the Housing Element EIR

The Supplemental Letter claims the City failed to provide substantial evidence supporting use of the Housing Element EIR and makes bare allegation that 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.⁶ These arguments fail as a matter of law.

Contrary to Appellant's claims, CEQA specifically authorizes reliance on a Program EIR, such as the Housing Element EIR, for later individualized projects. According to the CEQA Guidelines, "[a] Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related...[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."⁷ Here, the Housing Element EIR analyzes development of 420,327 housing units "anywhere in the City where residential uses are permitted"⁸ that are consistent with the City's adopted Housing Element. The

⁴ Supplemental Letter, p. 7.

⁵ *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 234 Cal.App.4th 214, 239.

⁶ Supplemental Letter, pp. 5-6.

⁷ CEQA Guidelines § 15168(a)(4).

⁸ Housing Element EIR, p. 3-32.

projects analyzed in the Housing Element EIR, including the subject Project, have similar effects such that their potential impacts can be addressed through the Housing Element EIR's mitigation measures.⁹

In relying upon a Program EIR for subsequent activities, the lead agency must examine those activities to determine whether additional environmental review is required. In particular, the agency must examine whether the activity is within the scope of the Program EIR, whether it will result in environmental effects that were not examined in the Program EIR, and whether subsequent review is required.¹⁰ If the agency finds that pursuant to CEQA Guidelines Section 15162, no subsequent CEQA review would be required, the agency can approve the activity as being within the scope of the Program EIR, and no new environmental document would be required.

As described by the CEQA Guidelines, whether a later activity is within the scope of the Program EIR is a factual question that the lead agency determines based on substantial evidence in the record. In determining whether a later action is within the scope of the program analyzed in the Program EIR, a lead agency has discretion to consider the following: (1) the consistency of the later activity with the type of land use allowed, (2) the planned density and building intensity, (3) the geographic area analyzed for environmental impacts, and (4) covered infrastructure as described in the Program EIR.¹¹ Whether an activity is within the scope of a Program EIR is a question of fact that the agency determines on the basis of substantial evidence in the record.¹² The Legislature has directed lead agencies to tier from EIRs, including Program EIRs, "whenever feasible."¹³ Where the later activities involve site specific operations, the CEQA Guidelines advise that an 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 within the scope of the Program EIR.¹⁴

As described in more detail below, the Housing Element EIR contains all necessary analysis to allow the City, as lead agency, to determine whether a subsequent housing development project is within the scope of the Housing Element EIR. The City has both developed a written checklist to be utilized in determining whether such subsequent housing development projects can be found to be within the scope of the Housing Element EIR and also requires extensive site-specific technical analyses to be prepared for such subsequent housing projects.

B. Substantial Evidence Supports the City's Reliance on the Housing Element EIR to Analyze Subsequent Housing Development Activities

Consistent with CEQA Guidelines Section 15168, the Housing Element EIR analyzed the potential environmental effects of a series of housing-related activities that would be carried out throughout the City under the same regulatory authority and would have generally similar environmental effects that can be mitigated in similar ways. Specifically, the Housing Element EIR analyzes the development of 420,327 new housing units across nearly all areas of the City, consistent with the City's Regional Housing Needs Allocation ("RHNA"). As discussed more fully in the Project Description for the Housing Element EIR, these

⁹ See *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal.App.4th 214.

¹⁰ CEQA Guidelines § 15168(c).

¹¹ CEQA Guidelines § 15168(c)(2).

¹² *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) 6 Cal.App.5th 160, 174; *Latinos Unidos de Napa v. City of Napa* (2013) 221 Cal.App.4th 192, 204.

¹³ Pub. Res. Code § 21093.

¹⁴ CEQA Guidelines § 15168(c)(4).

units may be developed “anywhere in the City where residential uses are permitted” or where properties will be rezoned to allow for residential units.¹⁵ As further described by the Housing Element EIR, these new housing units are anticipated to occur in various development typologies, ranging from small single-family residential developments to extremely large multifamily and mixed-use developments, and in multiple locations, including sites currently zoned for single-family residential uses.¹⁶ Here, the Project proposes 21 single-family residences on a site zoned RA, which zone allows residential uses. Therefore, the Project is clearly consistent with the typology and location of anticipated new housing units per the Housing Element EIR.

Furthermore, to assess the anticipated type and scope of environmental effects resulting from the contemplated development of these 420,327 housing units, the City surveyed the thousands of environmental assessments that have been recently prepared for housing developments throughout the City and selected 54 case studies to discuss in detail in the Housing Element EIR that identified both the typical- and worst-case environmental impacts from housing developments of varying scale and in diverse locations.¹⁷ Specifically, the case studies, which included EIRs, mitigated negative declarations, and sustainable communities environmental assessments, were selected based on the type of project (e.g., multi-family residential, single-family residential, accessory dwelling unit, mixed-use development, and conversion and/or rehabilitation); scale of project (single-family to large tower/mixed use); and locations with the broadest range of geographies, environmental conditions, and levels of development and density (hillsides, urban, regional centers, coastal, and suburban areas). By analyzing such a wide array of projects and associated environmental assessments, the City sought to identify all of the reasonably foreseeable ways housing development projects can result in environmental impacts, as well as identify the most appropriate and effective mitigation measures to address such impacts. Of note, the case studies utilized in the Housing Element EIR included ten single-family residential development projects. Ultimately, relying upon these case studies as well as the multiple other analyses prepared for the Housing Element EIR, the City found that the environmental effects identified by prior environmental assessments were appropriately representative of the typical- and worst-case environmental impacts of housing development to be built to accommodate the City’s RHNA, such that the Housing Element EIR could serve as a Program EIR for subsequent housing-related development activities. This is made clear by the Housing Element EIR itself, which plainly states that “[i]t is contemplated that future site-specific approvals may be evaluated with consideration of the [Housing Element] EIR under CEQA rules for subsequent approval” and specifically identifies projects within the scope of a Program EIR as “eligible for streamlined review.”¹⁸

To further implement the requirements of the CEQA Guidelines regarding use of a Program EIR for subsequent activities, the City has developed a CEQA Streamlining Checklist¹⁹ and accompanying detailed instructions²⁰ to be utilized for all housing development projects seeking to be considered a subsequent activity under the Housing Element EIR. These checklist documents provide a summary of the same substantial evidence cited above regarding the Housing Element EIR’s analysis of potential environmental effects; namely, the Housing Element EIR’s consideration of a wide range of housing

¹⁵ Housing Element EIR, p. 3-32.

¹⁶ *Id.*

¹⁷ See Housing Element EIR, Tables 4.1 and 4.2.

¹⁸ Housing Element EIR, p. 1-5.

¹⁹ Form CP-4089.

²⁰ Form CP-4091.

development typologies, densities, and locations to assess the type and scale of environmental effects anticipated to result from the development of housing units to meet the City's RHNA. Furthermore, the Checklist and associated documents specifically identify the supplemental site-specific analyses that may be required to be prepared for various housing development projects in order to allow the City to assess whether the project in question can be found to be within the Housing Element EIR's scope, and also identify all of the Housing Element EIR's mitigation measures ("MMs") that are to be considered for implementation for all subsequent housing projects seeking to be considered within the scope of the Housing Element EIR.

In summary, the City considered all necessary substantial evidence when preparing the Housing Element EIR to allow it to properly serve as a Program EIR for subsequently proposed housing development projects throughout the City. Furthermore, the City's implementation of the CEQA Streamlining Checklist and accompanying instructions permits the City to perform the required site-specific analysis of such subsequently proposed housing projects and authorizes the City to impose all applicable MMs identified by the Housing Element EIR. Accordingly, because the proposed Project is within the scope of the Housing Element EIR and will comply with all applicable MMs therein, it was appropriate for the City to rely on the Housing Element EIR in approving the Project.

C. The Checklist Prepared for the Project Provides Substantial Evidence that the Project is Within the Scope of the Housing Element EIR

As called for by CEQA Guidelines Section 15168(c)(4), the City prepared a CEQA Streamlining Checklist for the Project and found the Project to be within the scope of the Program EIR. While the Supplemental Letter broadly criticizes the Checklist, Appellant's claims that the Checklist is inadequate are unsupported by the whole of the record. As discussed above, substantial evidence supports the City's findings and reliance on the Housing Element EIR.

The detailed Checklist prepared for the Project examined each of the impact areas analyzed in the Housing Element EIR to determine whether the Project was within the scope of the EIR. This included the preparation of the following technical studies pursuant to the adopted mitigation measures: air quality, biology, tree report, historical resources, archaeology, noise, and paleontology. A more detailed discussion of the specific issues raised by Appellant (historic, hazards, and agriculture) is provided below.

The Supplemental Letter included a bulleted list of elements of the checklist that it considers "inappropriate[]" but fails to provide citations to law or justifications to support its claim.²¹ While these are nothing but bare assertions that require no response, it is worth noting several inaccuracies in the Supplemental Letter. First, there are no proposed substitute mitigation measures, thus no attachments are included or needed, nor is any list of substituted mitigation measures needed. Second, the allegedly missing Attachments B, C, and D are documents prepared by Appellant, not the expert technical studies prepared by the City and its consultants. Nothing in CEQA requires an opponent prepared studies to be attached to an environmental analysis. In fact, under the substantial evidence standard, a local agency's expert analysis constitutes the needed substantial evidence to support its determination, even if the record contains other evidence.²² Appellant also identifies use of the Housing Element EIR's mitigation measures as a problem, even though CEQA Guidelines 15168(c)(2) specifically requires a local agency to

²¹ Supplemental Letter, p. 9.

²² *North Coast Rivers Alliance v. Marin Municipal Water Dist. Bd. of Directors* (2013) 214 Cal.App.4th 614, 653.

incorporate applicable mitigation measures from the EIR. The Appellant's contentions are misleading, without merit, and should be disregarded.

Appellant's allegation that the City's analysis is improper because the Property was not included in the Housing Element Inventory Adequate Sites ("Inventory") is similarly without merit.²³ The test of whether a subsequent project is "within the scope" of a program EIR is not whether it is on the Inventory. As discussed above (and as conceded in the Supplemental Letter), CEQA Guidelines Section 15168 governs the use of a Program EIR with later activities, and it does not require that a site be on the Inventory. Instead, it requires the lead agency to determine whether the Program EIR sufficiently analyzed the project, whether it would have impacts not already analyzed in the Program EIR, and requires imposition of MMs. The City did that here as discussed above. A simple mathematical review of the Housing Element EIR further exposes why Appellant's allegation is unfounded. As discussed in the Housing Element EIR, the Inventory includes sites that are available for residential development.²⁴ However, the Inventory only identifies capacity for 266,647 dwelling units, which is far less than the City's RHNA allocation of 420,327. The sites on the Inventory represent only a portion of the 420,327 units analyzed in the Housing Element EIR, as described fully in that document's project description. The Inventory is not meant to limit where housing can be built; it only demonstrates a portion of the City's capacity to accommodate housing. Indeed, the City's Housing Element Streamlining Checklist Instructions (Form CP-4091) specifically state that "any type of housing project anywhere in the City is eligible for use of the clearance. It does not need to be a site listed in an [Housing Element] appendix." As such, the Supplemental Letter does not provide any additional justification for why the Project is not within the scope of the Housing Element EIR.

V. The Project Will Not Have Significant Impacts Necessitating Preparation of an EIR

A. The Housing Element EIR Analyzed Development in Very High Fire Hazard Severity Zones

Despite Appellant's claims to the contrary, the Housing Element EIR analyzed development in Very High Fire Hazard Severity Zones ("VHFHSZ"), states that development, especially single-family development projects, may occur in VHFHSZs, and contains applicable mitigation measures with which a project must comply if it is located in a VHFHSZ and the Los Angeles Fire Department finds such mitigation measures necessary because existing regulations would not avoid fire risks.²⁵ In this case, the Fire Department imposed conditions of approval, but did not require implementation of the mitigation measures. (See conditions in Exhibit B.)²⁶ In addition, the Project would be required to comply with all applicable Building and Fire Code requirements, including but not limited to those related to structural design, building materials, emergency and fire truck access, brush and landscape clearance, hydrant placement, and fire flow. Current Building Code requirements mandate the use of fire-resistant construction materials outlined in Chapter 7 (Fire and Smoke Protection Features), Chapter 7A (Materials and Construction Methods for Exterior Wildfire Exposure), Chapter 9 (Fire-Protection Systems), and Chapter 10 (Means of Egress), among others. As required under the LAMC, landscaping would include drought-tolerant, fire-resistant plants and xeriscaping to minimize potential fuel load at the Project Site. Also, the Project would be required to comply with the City's Brush Clearance Requirements pursuant to the City's Fire Code. Further, the Project would be required to comply with Appendix D (Fire Apparatus

²³ Supplemental Letter, pp. 9-10.

²⁴ Draft EIR, p. 3-19.

²⁵ Draft EIR, p. 4.12.

²⁶ See, also, Fire Department VTTM Conditions 73-95 in the VTTM LOD.

Access Roads) of the City's Fire Code that outlines all of the development standards for the proposed roadway that must be met, including width, length, setback from buildings, paving materials, gate accessibility, turnaround parameters, etc. In accordance with existing code requirements, the homes would include fire-suppression sprinklers. Compliance with the applicable requirements would be demonstrated as part of the LAFD's fire/life safety plan review and inspection for new construction projects as set forth in LAMC Section 57.118. Given all of the above, the alleged fire impacts are speculative.

B. The Project Complies with State Minimum Fire Safety Regulations and LAFD Requirements

The Appellant claims the Project fails to comply with California Code of Regulations, Title 14, Section 1273.08 regarding fire safety regulations for dead-end roads, specifically, that the Project does not comply with the regulations because it would be served by a private dead-end road that is greater than 800 feet in length. However, the Appellant also concedes that Condition 77 of the VTTM LOD mandates that no street or fire lane be greater than 700 feet in length (less than what is required by the State) unless secondary access is provided. As set forth in Exhibit B, the LAFD thoroughly reviewed the Project and imposed specific conditions to ensure compliance with applicable State minimum fire safety standards. Prior to receiving a building permit, the Project must comply with all adopted conditions, including the length of the street.²⁷ Therefore, the Project complies with all applicable requirements.

Similarly, the Appellant alleges the Project violates a City requirement that prohibits a dead-end street or fire lane that is greater than 700 feet in length without secondary access. Again, Appellant concedes that the City has imposed a condition requiring that the street either be no longer than 700 feet or, if it is longer than 700 feet, that a secondary access be provided. As a condition of approval, the Project must comply with that requirement. Therefore, the Appellant's contention is without merit.

C. The Project Will Not Have Significant Impacts to Historic Resources

In connection with completing the CEQA Streamlining Checklist for the Project, the City evaluated a Historic Resource Assessment ("HRA") Report prepared for the Project pursuant to Housing Element EIR Mitigation Measure 4.4-1(a).²⁸ The HRA Report determined, based on substantial evidence, that the Property is not eligible for listing in the National or State historic registers; moreover, due to the City Council's prior denial of a Historic-Cultural Monument ("HCM") nomination for the Property in 2022, the Property is not eligible for listing as a local historic resource. Notwithstanding the conclusions of the HRA, the Supplemental Letter claims that the Property remains eligible for designation as a historic resource. In making the current claims of historic eligibility, the Supplemental Letter appears to rely largely on the staff report prepared by the Cultural Heritage Commission ("CHC") in support of the HCM nomination for the Property, notwithstanding the fact that the City Council ultimately rejected the CHC's recommendation of eligibility because it was based on flawed and inaccurate evidence. Specifically, the City Council's determination was based, in part, on the May 12, 2022 peer review of the CHC's HCM nomination staff report prepared by expert historian Teresa Grimes.²⁹ That peer review debunked many

²⁷ LAMC § 13.A.2.7.B.

²⁸ Historical Resource Assessment Report, Teresa Grimes, Teresa Grimes Historic Preservation, January 2024. (Exhibit C.)

²⁹ HCM Nomination Peer Review, Teresa Grimes, Teresa Grimes Historic Preservation, May 12, 2022. (Exhibit D.)

of the erroneous statements contained in the CHC staff report. For example, the original nomination contained no footnotes; the nomination was not based on any scholarly or primary sources; and aerial photography was limited to those found in a *New York Times* article, instead of relying on easily available aerial photography of the entire site and all buildings. Moreover, the CHC report failed to acknowledge that the orange grove had been entirely replanted in the 1980s, thereby fully undermining the significance of the trees on-site. Accordingly, these erroneous statements contained in the CHC staff report cannot serve as the basis for the Supplemental Letter's current claims.

Furthermore, and as set forth in the attached supplemental expert report ("Historic Response Letter")³⁰ responding to Appellant's claims, the Appellant continues to misrepresent the criteria for designation as a historic resource at the state or national level as well as the Property's eligibility as a historical resource. As detailed in the Historic Response Letter, properties identified by the City's SurveyLA mapping effort are not mandatory or presumptive historical resources, and while properties designated as HCMs are presumed to be historical resources for CEQA purposes, those that have been *nominated and rejected* are not. As described above, though the Property was initially identified as a potential historical resource by SurveyLA, it was ultimately determined to be ineligible for designation based upon further investigation conducted as part of the CHC's nomination process and the City Council's consideration of both the CHC's staff report and supplemental evidence contained in the peer report.

The Supplemental Letter also incorrectly suggests the Property is eligible for listing in the California or National Registers because its period of significance and the connection to the City's agricultural and entertainment history as well as its relation to Lindley Bothwell. As explained below and more fully in the Historic Technical Response Letter, these claims are unsupported.

To be eligible for listing in the National and California Registers, a property must have *achieved significance* more than 50 years ago. Thus, to be eligible for listing in the National or California Registers when the environmental review was conducted in 2024, the Property must have achieved significance by 1974, 50 years ago, or meet special requirements.

As described in the Historic Response Letter, there is no evidence the citrus grove on the Property played a significant role in the history of agriculture before 1974 such that it would be significant under Criterion A for inclusion in the National Register. According to *National Register Bulletin #15*, "[m]ere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well."³¹ The grove on the Property is not especially old in the context of the citrus industry in Los Angeles, as it was completely replaced between 1980 and 1985. While the Supplemental Letter references a comment in the National Register Nomination prepared for the Property that states "[e]ven with the replacement of older citrus trees with newer ones, Bothwell Ranch retains historic site and architectural integrity,"³² the property is not automatically significant simply because of its age. To be eligible, the Property must be significant in the

³⁰ Historical Resource Technical Response Letter, Teresa Grimes, Teresa Grimes Historic Preservation, February 4, 2025. ([Exhibit E](#)).

³¹ Patrick Andrus and Rebecca Shrimpton, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: U.S. Department of the Interior, 1997), at 12.

³² Supplemental Letter, p. 17.

history of agriculture beyond its age, which has not been demonstrated by the Appellant. Moreover, the Supplemental Letter contains no evidence to support its claim.

The Appellant also incorrectly claims the Property is significant under Criterion A in the context of the entertainment industry as the location of the “first live outdoor dramatic color television broadcast,” specifically the filming of an episode of a drama series called *Matinee Theater* on the Property – the Appellant provides no details of when this specific episode was filmed or aired, but in the course of preparing the Historic Technical Response Letter, it was determined that this episode aired on January 11, 1956. The Appellant does not cite any scholarly sources (or any sources whatsoever) regarding the history of television to explain how this event was a milestone, nor were any found in the preparation of the Historic Technical Response Letter. Even if the episode filmed on the Property was an important milestone in the history of television, the period of significance would be 1956. The Appellant does not identify the physical features of the Property that would illustrate this moment in time. Additionally, to be eligible for listing in the National Register, the Property would need to retain sufficient integrity from 1956 to convey the significance, which is not the case.

The Applicant also has not demonstrated how the Property is significant due to its connection to Lindley Bothwell. The potential significance of the Property in relation to Lindley Bothwell was fully analyzed in the HRA Report and found ineligible for listing under Criterion B for inclusion in the National Register. The Appellant does not offer any new credible information regarding Bothwell, merely a different opinion, which, as the Historic Response Letter notes, is inconsistent with the National Park Service guidance for determination of historic eligibility.

The Appellant’s final historic claim, that the Property’s period of significance dates from 1926 (when the property was first managed as an orange grove) to 2016 (when grove operations ceased) is incorrect. Since the Property was found ineligible for listing in the National and California Registers in the HRA Report, it has no period of significance. Therefore, the Appellant’s assertion that the Property’s period of significance ended in 2016 reflects an incorrect conflation of the continued use of a property with a potential period of significance for a property, which as explained in the HRA and in the Historic Technical Response Letter, does not apply to the Property.

In summary, the City’s site-specific analysis of the potential historic resource impacts of the Project was properly supported by substantial evidence and sufficiently concluded that the Project will not have a significant adverse impact on a historical resource, such that it does not have historic impacts that were not addressed in the Housing Element EIR.

D. The Project Will Not Have Significant Agricultural Impacts

The Supplemental Letter alleges that the Property is designated as Prime Farmland and claims the loss of 14 acres of such farmland will be a significant impact. Substantial evidence prepared as part of the CEQA Streamlining Checklist for the Project demonstrates otherwise.

Based on prior orchard operations, the 14-acre Property was mapped as Prime Farmland and Unique Farmland by the California Resources Agency. The Property was originally part of a much larger citrus operation and then a smaller 30-acre operation, the lands of which have been further subdivided over the years and largely developed with the single-family residential uses that currently surround the Property. The only source of irrigation water for the Property is retail water provided by the Los Angeles

Department of Water and Power (“LADWP”). Commercially-operated citrus groves annually require between 2.5-to-3.5-acre feet of water per acre of grove area, which is very expensive in a metropolitan area, as discussed in the Tree Report prepared for the Project.³³ Furthermore, citrus trees need regular irrigation to produce volume and quality fruit. When water is curtailed, trees can survive for some time, but fruit production ceases, and tree damage can become permanent. Due to drought conditions in Southern California and the cost of water for irrigating the orchard, the orchard has been underwatered for multiple years, resulting in substantial leaf loss, wilt, and dieback.³⁴ The orchard is currently in moderate- to severe-stress conditions and has not been harvested since 2019. As set forth by citrus expert and certified arborist Dave Matias,³⁵ due to drought conditions, the cost of irrigation water, the lack of nearby agricultural resources, and poor tree conditions, the orchard cannot return to active operations and harvesting. Even if watering the trees was not prohibitively expensive, they could not be used for agricultural production because they are beyond their useful life and beyond repair. Indeed, this was already the case when the Applicant purchased the property because of the age of the trees, the drought, and the fact the previous owners had stopped watering the trees. Accordingly, the 14-acre orchard portion of the Property no longer meets applicable criteria for being designated as Prime or Unique Farmland.

These current site conditions have been analyzed as part of the Farmland Analysis prepared for the City’s CEQA Streamlining Checklist, using the California Department of Conservation’s Land Evaluation and Site Assessment (“LESA”) Model to determine the potential significance of a project’s conversion of agricultural lands.³⁶ Factoring in the increased need to import water for irrigation on the Property and the continued drought conditions in the region along with the Property’s soil classes and proximity of surrounding agricultural land, the overall LESA score is 33.6 on a scale of 1 to 100. This correlates to a result “Not Considered Significant” according to the LESA Model Scoring Thresholds. Additionally, the Property does not have designated water rights for irrigation and is required to use domestic water from LADWP that is priced and managed for retail users that are incompatible with large-scale commercial agricultural production.

As summarized above and as set forth in the multiple site-specific analyses prepared for the Property, the orchard is in moderate- to severe-stress conditions, the site is not considered significant agricultural land based on the LESA Model, the site is small and completely surrounded by non-agricultural uses, and the site does not have any agricultural water rights. Thus, following the redesignation, the Project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use and will not have a significant impact on an agricultural resource under CEQA.

³³ Appendix E-Bothwell Citrus Ranch Evaluation, Protected Tree Report, Lisa Smith, The Tree Resource, February 1, 2024. (Exhibit E.)

³⁴ *Id.*

³⁵ *Id.*

³⁶ Assessment for Property Designation as Prime Farmland, Albus & Associates, February 3, 2023. (Exhibit G.)

Planning and Land Use Committee

April 2, 2025

Page 12

Based on all of the foregoing, we respectfully request that the City Council deny the Appeal and allow this much needed housing project to move forward.

Sincerely,

A handwritten signature in cursive script that reads "Elisa Paster".

Elisa Paster
Managing Partner
of RAND PASTER & NELSON, LLP

EP

Exhibit A



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March 20, 2025

VIA EMAIL

City Council
City of Los Angeles
200 North Spring Street
Los Angeles, CA 90012

**Re: Response to Channel Law Group's Appeal re 5300 Oakdale Avenue Project
(VTT-83927; ENV-2020-6762-EIR; Related Case No. ZA-2023-2170-ZAD-ZV-ZAA)**

Dear President Harris-Dawson and Honorable Councilmembers:

We are writing on behalf of Oakdale Estates, LLC ("Applicant") regarding its proposed project at 5300 Oakdale Avenue ("Property"), an approximately 13.29-acre site located at the northeast corner of Oakdale Avenue and Collier Street in the Encino-Tarzana area of Los Angeles ("City"). The proposed project ("Project") consists of 21 residential dwelling units (plus 19 accessory dwelling units) on the approximately 9.14-acre western portion of the Property, and an open space/ preservation area ("Preservation Area") on the approximately 4.15-acre eastern portion of the site. In conjunction with the Project, the Preservation Area would be donated to a conservation organization such as the Santa Monica Mountains Conservancy/ Mountain Recreation Conservation Authority ("MRCA") to remain as open space in perpetuity.

This letter responds to the March 16, 2025 appeal letter ("Appeal Letter") submitted by Channel Law Group, on behalf of West Valley Alliance for an Optimal Living ("Appellant"), objecting to the Project's Vesting Tentative Tract Map ("VTTM") approval and reliance on the Program Environmental Impact Report ("EIR") for the Citywide Housing Element 2021-2029 and Safety Element Updates ("Housing Element EIR") (ENV-2020-6762-EIR) as the environmental clearance document for the Project under the California Environmental Quality Act ("CEQA"). This letter responds to the claims made by the Appellant in the Appeal Letter; as set forth in detail below, the Appellant's claims are not supported by substantial evidence and therefore have no merit. Furthermore, the Appellant's attempts to impede the Project at every opportunity is particularly disheartening given the fact that the Project would result in new housing units at the Property at a time that the City's housing crisis has been made significantly worse by the destruction of more than 16,000 homes and other structures in the recent devastating fires. The meritless appeal filed in this case is delaying the Project's production of housing units, which is supported by a broad coalition of community members, including both the Woodland Hills-Warner Center and the Tarzana Neighborhood Councils, local neighbors, the MRCA, and elected officials. For all of the reasons set forth herein, we respectfully request that the City Council **deny** the appeal.

I. Project History and Background

On December 20, 2024, the Zoning Administrator (“ZA”) approved a ZA Determination, Variance, and ZA Adjustment for the Project (ZA-2023-2170-ZAD-ZV-ZAA) and determined the Project was within the scope of environmental review performed by the certified Housing Element EIR. On December 20, 2024, the Deputy Advisory Agency approved a VTTM for the Project (VTT-83927) and similarly found that the Project was within the scope of the Housing Element EIR. On January 5, 2025, the Appellant submitted appeals of the ZA entitlement approvals and the VTTM approval to the City Planning Commission (“CPC”). On March 7, 2025, the CPC issued a Letter of Determination regarding the VTTM stating that the CPC and 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 Government Code Section 66452.5(c)(1). As such, the failure of the appeal board to render a timely decision on the appeal resulted in a denial of the appeal pursuant to Government Code Section 66452.5(c)(1) and Los Angeles Municipal Code Section 13.A.2.8.F.2, and the January 6, 2025 VTTM appeal to the CPC was deemed denied on March 7, 2025. The Appellant subsequently filed its appeal to the City Council on March 16, 2025.

As discussed herein, contrary to the assertions in the Appeal Letter, the Deputy Advisory Agency did not commit any error or abuse of discretion in approving the Project, and substantial evidence supports the City’s CEQA findings that 1) the Project is within the scope of the Housing Element EIR pursuant to CEQA Guidelines Section 15168, and 2) none of the triggers requiring subsequent environmental review pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162 exist in this case. Therefore, we respectfully request that the City Council deny the appeal and affirm the Project approvals.

II. The Project Description Accurately Describes the Proposed Project

The Appeal Letter alleges that the Project description “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.”¹ However, immediately prior to making this alarmist statement, the Appellant has directly quoted from the Project description contained in the City’s hearing notice, which states that the Project involves “the removal of existing structures and a portion of an existing orchard.”² The quoted Project description further states that the Project will “preserve 308 trees and will plant 328 new trees.” The Project description, therefore, provides an accurate summary of the proposed Project, including the removal of the existing farm structures and orchard. Appellant’s very first argument is frivolous and without merit.

III. The City Properly Relied on the Housing Element EIR

A. The CEQA Guidelines Explicitly Authorize Reliance on Program EIRs such as the Housing Element EIR

The Appeal Letter claims the City failed to provide substantial evidence or even a fair argument that reliance on the Housing Element EIR is appropriate to analyze the Project’s potential environmental

¹ Appeal Letter, p. 2.

² *Id.*

impacts. Appellant further makes the blanket allegation that 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.³ These arguments fail as a matter of law.

Contrary to Appellant's claims, CEQA specifically authorizes reliance on a Program EIR, such as the Housing Element EIR, for later individualized projects. According to the CEQA Guidelines, "[a] program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related...[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."⁴ Here, the Housing Element EIR analyzes projects that are consistent with the City's recently adopted Housing Element, which projects will have similar effects that can be addressed through the Housing Element EIR's mitigation measures.⁵

In relying upon a Program EIR for subsequent activities, the lead agency must examine those activities to determine whether additional environmental review is required. In particular, the agency must examine whether the activity is within the scope of the Program EIR, whether it will result in environmental effects that were not examined in the Program EIR, and whether subsequent review is required.⁶ If the agency finds that pursuant to CEQA Guidelines Section 15162, no subsequent CEQA review would be required, the agency can approve the activity as being within the scope of the Program EIR, and no new environmental document would be required.

As described by the CEQA Guidelines, whether a later activity is within the scope of the 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.⁷ Where the later activities involve site specific operations, the CEQA Guidelines advise that an 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 within the scope of the Program EIR.⁸

As described in more detail below, the Housing Element EIR contains all necessary analysis to allow the City, as lead agency, to determine whether a subsequent housing development project is within the scope of the Housing Element EIR. The City has both developed a written checklist to be utilized in determining whether such subsequent housing development projects can be found to be within the scope of the Housing Element EIR, and also requires extensive site-specific technical analyses to be prepared for such subsequent housing projects.

³ Appeal Letter, p. 5.

⁴ CEQA Guidelines § 15168(a)(4).

⁵ See *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal.App.4th 214.

⁶ CEQA Guidelines § 15168(c).

⁷ CEQA Guidelines § 15168(c)(2).

⁸ CEQA Guidelines § 15168(c)(4).

B. Substantial Evidence Supports the City's Reliance on the Housing Element EIR to Analyze Subsequent Housing Development Activities

Consistent with CEQA Guidelines Section 15168, the Housing Element EIR analyzed the potential environmental effects of a series of housing-related activities that would be carried out throughout the City under the same regulatory authority and would have generally similar environmental effects which can be mitigated in similar ways. Specifically, the Housing Element EIR analyzes the development of 420,327 new housing units across nearly all areas of the City, consistent with the City's Regional Housing Needs Allocation ("RHNA"). As discussed more fully in the project description for the Housing Element EIR, these units may be developed anywhere in the City where residential uses are permitted or where properties will be rezoned to allow for residential units.⁹ As further described by the Housing Element EIR, these new housing units are anticipated to occur in various development typologies, ranging from small single-family residential developments to extremely large multifamily and mixed-use developments, and in multiple locations, including sites currently zoned for single-family residential uses.¹⁰ Here, the Project proposes 21 single-family residences on a site zoned RA, which zone allows residential uses. Therefore, the Project is clearly consistent with the typology and location of anticipated new housing units per the Housing Element EIR.

Furthermore, to assess the anticipated type and scope of environmental effects resulting from the contemplated development of these 420,327 housing units, the City surveyed the thousands of environmental assessments that have been recently prepared for housing developments throughout the City and selected 54 case studies to discuss in detail in the Housing Element EIR that identified both the typical- and worst-case environmental impacts from housing developments of varying scale and in diverse locations.¹¹ Specifically, the case studies, which included EIRs, mitigated negative declarations, and sustainable communities environmental assessments, were selected based on the type of project (e.g., multi-family residential, single-family residential, accessory dwelling unit, mixed-use development, and conversion and/or rehabilitation); scale of project (single-family to large tower/mixed use); and locations with the broadest range of geographies, environmental conditions, and levels of development and density (hillside, urban, regional centers, coastal, and suburban areas). By analyzing such a wide array of projects and associated environmental assessments, the City sought to identify all of the reasonably foreseeable ways housing development projects can result in environmental impacts, as well as identify the most appropriate and effective mitigation measures to address such impacts. Of note, the case studies utilized in the Housing Element EIR included ten single-family residential development projects. Ultimately, relying upon these case studies as well as the multiple other analyses prepared for the Housing Element EIR, the City found that the environmental effects identified by prior environmental assessments were appropriately representative of the typical- and worst-case environmental impacts of housing development to be built to accommodate the City's RHNA, such that the Housing Element EIR could serve as a Program EIR for subsequent housing-related development activities. This is made clear by the Housing Element EIR itself, which plainly states that "[i]t is contemplated that future site-specific approvals may be evaluated with consideration of the [Housing

⁹ Housing Element EIR, p. 3-32.

¹⁰ *Id.*

¹¹ See Housing Element EIR, Tables 4.1 and 4.2.

Element] EIR under CEQA rules for subsequent approval” and specifically identifies projects within the scope of a Program EIR as “eligible for streamlined review.”¹²

To further implement the requirements of the CEQA Guidelines regarding use of a Program EIR for subsequent activities, the City has developed a CEQA Streamlining Checklist¹³ and accompanying detailed instructions¹⁴ to be utilized for all housing development projects seeking to be considered a subsequent activity under the Housing Element EIR. These checklist documents provide a summary of the same substantial evidence cited above regarding the Housing Element EIR’s analysis of potential environmental effects; namely, the Housing Element EIR’s consideration of a wide range of housing development typologies, densities, and locations to assess the type and scale of environmental effects anticipated to result from the development of housing units to meet the City’s RHNA. Furthermore, these checklist documents specifically identify the supplemental site-specific analyses that may be required to be prepared for various housing development projects in order to allow the City to assess whether the project in question can be found to be within the Housing Element EIR’s scope, and also identify all of the Housing Element EIR’s mitigation measures (“MMs”) that are to be considered for implementation for all subsequent housing projects seeking to be considered within the scope of the Housing Element EIR.

In summary, the City considered all necessary substantial evidence when preparing the Housing Element EIR to allow it to properly serve as a Program EIR for subsequently proposed housing development projects throughout the City. Furthermore, the City’s implementation of the CEQA Streamlining Checklist and accompanying instructions permits the City to perform the required site-specific analysis of such subsequently proposed housing projects, and authorizes the City to impose all applicable MMs identified by the Housing Element EIR. Accordingly, because the proposed Project is within the scope of the Housing Element EIR and will comply with all applicable MMs therein, it was appropriate for the City to rely on the Housing Element EIR in approving the Project.

IV. The Project Will Not Have Any Impacts that Were Not Addressed in the Housing Element EIR

The Appeal Letter alleges that the City has undertaken no site-specific analysis of the environmental impacts of the Project. To the contrary, and as described above, in accordance with CEQA Guidelines Section 15168(c)(4), the City’s comprehensive CEQA Streamlining Checklist was utilized by the City to evaluate the Project. In connection with completing this checklist, multiple site-specific technical studies and reports were prepared and submitted to the City, including a Farmland Analysis, Biological Resources Report, Tree Report, Historic Resource Assessment Report, and Phase I Archaeological Assessment. Together, these documents demonstrate that the Project is within the scope of the Housing Element EIR and that it does not involve environmental effects not already analyzed therein. Below, we discuss the specific impact-related claims raised in the Appeal Letter.

A. The Project Is Not a Historical Resource and Will Not Have a Significant Adverse Impact On A Historical Resource Under CEQA

¹² Housing Element EIR, p. 1-5.

¹³ Form CP-4089.

¹⁴ Form CP-4091.

In connection with completing the CEQA Streamlining Checklist for the Project, the City evaluated a Historic Resource Assessment (“HRA”) Report prepared for the Project pursuant to Housing Element EIR Mitigation Measure 4.4-1(a).¹⁵ The HRA Report determined, based on substantial evidence, that the Property is not eligible for listing in the National or State historic registers; moreover, due to the City Council’s prior denial of a Historic-Cultural Monument (“HCM”) nomination for the Property in 2022, the Property is not eligible for listing as a local historic resource. Notwithstanding the conclusions of the HRA, the Appeal Letter claims that the Property remains eligible for designation as a historic resource. As a threshold matter, the claims being made in the Appeal Letter are not being made by a subject matter expert (neither the Appellant nor Channel Law Group are historic preservation professionals) and are not accompanied by any citations or the identification of any reference sources being relied upon; therefore, the claims being made do not constitute substantial evidence regarding the topic of historic resources.¹⁶ Furthermore, in making the current claims of historic eligibility, the Appeal Letter appears to rely largely on the staff report prepared by the Cultural Heritage Commission (“CHC”) in support of the HCM nomination for the Property, notwithstanding the fact that the City Council ultimately rejected the CHC’s recommendation of eligibility because it was based on flawed and inaccurate evidence. Specifically, the City Council’s determination was based, in part, on the May 12, 2022 peer review of the CHC’s HCM nomination staff report prepared by expert historian Teresa Grimes.¹⁷ That peer review debunked many of the erroneous statements contained in the CHC staff report. For example, the original nomination contained no footnotes; the nomination was not based on any scholarly or primary sources; and aerial photography was limited to those found in a *New York Times* article, instead of relying on easily available aerial photography of the entire site and all buildings. Moreover, the CHC report failed to acknowledge that the orange grove had been entirely replanted in the 1980s, thereby fully undermining the significance of the trees on-site. Accordingly, these erroneous statements contained in the CHC staff report cannot serve as the basis for the Appeal Letter’s current claims.

Furthermore, and as set forth in the attached supplemental letter responding to Appellant’s claims (“Historic Technical Response Letter”), the Appellant continues to misrepresent the criteria for designation as a historic resource at the state or national level as well as the Property’s eligibility as a historical resource.¹⁸ As detailed in the Historic Technical Response Letter, properties identified by the City’s SurveyLA mapping effort are not mandatory or presumptive historical resources, and while properties designated as HCMs are presumed to be historical resources for CEQA purposes, those that have been *nominated and rejected* are not. As described above, though the Property was initially identified as a potential historical resource by SurveyLA, it was ultimately determined to be ineligible for designation based upon further investigation conducted as part of the CHC’s nomination process and

¹⁵ Historical Resource Assessment Report, Teresa Grimes, Teresa Grimes Historic Preservation, January 2024. ([Exhibit A.](#))

¹⁶ See *Newtown Preservation Society v. County of El Dorado* (2021) 65 Cal.App.5th 771, 789 (Interpretation of technical information requires expert evaluation and testimony by members of the public on such issues does not qualify as substantial evidence); *Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 921.

¹⁷ HCM Nomination Peer Review, Teresa Grimes, Teresa Grimes Historic Preservation, May 12, 2022. ([Exhibit B.](#))

¹⁸ Historical Resource Technical Response Letter, Teresa Grimes, Teresa Grimes Historic Preservation, February 4, 2025. ([Exhibit C.](#))

the City Council's consideration of both the CHC's staff report and supplemental evidence contained in the peer report.

The Appeal Letter also incorrectly suggests the Property is eligible for listing in the California or National Registers because its period of significance and the connection to the City's agricultural and entertainment history as well as its relation to Lindley Bothwell. As explained below and more fully in the Historic Technical Response Letter, these claims are unsupported.

To be eligible for listing in the National and California Registers, a property must have *achieved significance* more than 50 years ago. Thus, to be eligible for listing in the National or California Registers when the environmental review was conducted in 2024, the Property must have achieved significance by 1974, 50 years ago, or meet special requirements.

As described in the Historic Technical Response Letter, there is no evidence the citrus grove on the Property played a significant role in the history of agriculture before 1974 such that it would be significant under Criterion A for inclusion in the National Register. According to *National Register Bulletin #15*, "[m]ere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well."¹⁹ The grove on the Property is not especially old in the context of the citrus industry in Los Angeles, as it was completely replaced between 1980 and 1985. Even if the original grove remained from 1926, a property is not automatically significant simply because of its age. To be eligible, the Property must be significant in the history of agriculture beyond its age, which has not been demonstrated by the Appellant.

The Appellant also incorrectly claims the Property is significant under Criterion A in the context of the entertainment industry as the location of the "first live outdoor dramatic color television broadcast," specifically the filming of an episode of a drama series called *Matinee Theater* on the Property – the Appellant provides no details of when this specific episode was filmed or aired, but in the course of preparing the Historic Technical Response Letter, it was determined that this episode aired on January 11, 1956. The Appellant does not cite any scholarly sources (or any sources whatsoever) regarding the history of television to explain how this event was a milestone, nor were any found in the preparation of the Historic Technical Response Letter. Even if the episode filmed on the Property was an important milestone in the history of television, the period of significance would be 1956. The Appellant does not identify the physical features of the Property that would illustrate this moment in time. Additionally, to be eligible for listing in the National Register, the Property would need to retain sufficient integrity from 1956 to convey the significance, which is not the case.

The Applicant also has not demonstrated how the Property is significant due to its connection to Lindley Bothwell. The potential significance of the Property in relation to Lindley Bothwell was fully analyzed in the HRA Report and found ineligible for listing under Criterion B for inclusion in the National Register. The Appellant does not offer any new credible information regarding Bothwell, merely a different opinion (again, unaccompanied by any citations to the sources of the Appellant's information), which, as the Historic Technical Response Letter notes, is inconsistent with the National Park Service guidance for determination of historic eligibility.

¹⁹ Patrick Andrus and Rebecca Shrimpton, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: U.S. Department of the Interior, 1997), at 12.

The Appellant's final historic claim, that the Property's period of significance dates from 1926 (when the property was first managed as an orange grove) to 2016 (when grove operations ceased) is incorrect. Since the Property was found ineligible for listing in the National and California Registers in the HRA Report, it has no period of significance. Therefore, the Appellant's assertion that the Property's period of significance ended in 2016 reflects an incorrect conflation of the continued use of a property with a potential period of significance for a property, which as explained in the HRA and in the Historic Technical Response Letter, does not apply to the Property.

In summary, the City's site-specific analysis of the potential historic resource impacts of the Project was properly supported by substantial evidence and sufficiently concluded that the Project will not have a significant adverse impact on a historical resource, such that it does not have historic impacts that were not addressed in the Housing Element EIR.

B. The Project is Not Located on Eligible Prime Farmland and Will Not Have a Significant Adverse Impact on an Agricultural Resource Under CEQA

The Appeal Letter alleges that the Property is designated as Prime Farmland and claims the loss of 14 acres of such farmland will be a significant impact. Substantial evidence prepared as part of the CEQA Streamlining Checklist for the Project demonstrates otherwise.

Based on prior orchard operations, the 14-acre Property was mapped as Prime Farmland and Unique Farmland by the California Resources Agency. The Property was originally part of a much larger citrus operation and then a smaller 30-acre operation, the lands of which have been further subdivided over the years and largely developed with the single-family residential uses that currently surround the Property. The only source of irrigation water for the Property is retail water provided by the Los Angeles Department of Water and Power ("LADWP"). Commercially-operated citrus groves annually require between 2.5-to-3.5-acre feet of water per acre of grove area, which is very expensive in a metropolitan area, as discussed in the Tree Report prepared for the Project.²⁰ Furthermore, citrus trees need regular irrigation to produce volume and quality fruit. When water is curtailed, trees can survive for some time, but fruit production ceases and tree damage can become permanent. Due to drought conditions in Southern California and the cost of water for irrigating the orchard, the orchard has been underwatered for multiple years, resulting in substantial leaf loss, wilt, and dieback.²¹ The orchard is currently in moderate- to severe-stress conditions and has not been harvested since 2019. As set forth by citrus expert and certified arborist Dave Matias,²² due to drought conditions, the cost of irrigation water, the lack of nearby agricultural resources, and poor tree conditions, the orchard cannot return to active operations and harvesting. Even if watering the trees was not prohibitively expensive, they could not be used for agricultural production because they are beyond their useful life and beyond repair. Indeed, this was already the case when the Applicant purchased the property because of the age of the trees, the drought, and the fact the previous owners had stopped watering the trees. Accordingly, the 14-acre

²⁰ Appendix E-Bothwell Citrus Ranch Evaluation, Protected Tree Report, Lisa Smith, The Tree Resource, February 1, 2024. (Exhibit D.)

²¹ *Id.*

²² *Id.*

orchard portion of the Property no longer meets applicable criteria for being designated as Prime or Unique Farmland.

These current site conditions have been analyzed as part of the Farmland Analysis prepared for the City's CEQA Streamlining Checklist, using the California Department of Conservation's Land Evaluation and Site Assessment ("LESA") Model to determine the potential significance of a project's conversion of agricultural lands.²³ Factoring in the increased need to import water for irrigation on the Property and the continued drought conditions in the region along with the Property's soil classes and proximity of surrounding agricultural land, the overall LESA score is 33.6 on a scale of 1 to 100. This correlates to a result "Not Considered Significant" according to the LESA Model Scoring Thresholds. Additionally, the Property does not have designated water rights for irrigation and is required to use domestic water from LADWP that is priced and managed for retail users that are incompatible with large-scale commercial agricultural production.

As summarized above and as set forth in the multiple site-specific analyses prepared for the Property, the orchard is in moderate- to severe-stress conditions, the site is not considered significant agricultural land based on the LESA Model, the site is small and completely surrounded by non-agricultural uses, and the site does not have any agricultural water rights. Thus, following the redesignation, the Project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use and will not have a significant impact on an agricultural resource under CEQA.

V. The Preservation and Donation of Two Lots and Construction of a Caretaker's Residence are Included in the Project Description and Do Not Need to be a Condition of Approval

The Appeal Letter requests that the preservation the two westernmost lots, the donation of those lots in fee to a public agency, and the construction of a caretaker's residence be included as a requirement in the Conditions of Approval for the Project. This is unnecessary because these actions are already described in the Project description, as included as Attachment A to the CEQA Streamlining Checklist. CEQA defines a "project" as "the whole of an action" that may result in either a direct physical environmental change or a reasonably foreseeable indirect change.²⁴ As such, the preservation and dedication of the lots along with the construction of the caretaker's residence are included as part of the overall "project" that was evaluated in the CEQA Streamlining Checklist. Although it is not necessary to also require this in a separate Condition of Approval, as the preservation and dedication and the caretaker's residence were part of the Project approved on December 20, 2024, the Applicant is willing to accept a Condition of Approval addressing this request.

VI. The VTTM's Environmental Findings are Sufficient And Not Flawed

The Appeal Letter specifically calls out the Deputy Advisory Agency's finding that "(t)he 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." The Appellant claims the

²³ Assessment for Property Designation as Prime Farmland, Albus & Associates, February 3, 2023. (Exhibit E.)

²⁴ CEQA Guidelines § 15378; see *Habitat & Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1297; *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1220.

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City failed “to analyze the same impact issues as CEQA” and “only brief[ly] discussed the biological resources issues associated with the Project.”²⁵

Contrary to Appellant’s allegation, the City did address potential site-specific environmental impacts associated with the Project via the CEQA Streamlining Checklist and technical reports prepared for the Project, as described above. Therefore, the VTTM’s environmental findings are sufficient and not flawed.

Based on all of the foregoing, we respectfully request that the City Council deny the appeal.

Sincerely,



Elisa Paster
Managing Partner
of RAND PASTER & NELSON, LLP

EP

cc: Elizabeth Ene, elizabeth.ene@lacity.org
Heather Bleemers, heather.bleemers@lacity.org
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²⁵ Appeal Letter, p. 14.

Exhibit A

5300 OAKDALE AVENUE Los Angeles, California



Historical Resource Assessment Report

Prepared by:
Teresa Grimes | Historic Preservation
January 2024

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EXECUTIVE SUMMARY

This report presents the results of a historical resource assessment of the property located at 5300 Oakdale Avenue in the Encino - Tarzana Community Plan Area of the City of Los Angeles. It is approximately 14 acres in size and includes four Assessor Parcel Numbers: 2164-008-001, 005, 006, and 007. The property is commonly known as Bothwell Ranch and includes a single-family house, grove, and variety of ancillary buildings. A proposed project (Project) would involve the redevelopment of approximately ten acres as 21 single-family lots with the development and donation of approximately four acres to the Santa Monica Mountains Recreation and Conservation Authority (MRCA).

The Project Site is not currently listed under federal, state, or local landmark or historic district programs; however, it was identified in the 2012 historic resource survey of the Encino - Tarzana Community Plan Area as appearing eligible for listing in federal, state, and local registers of historical resources. In 2022, the Los Angeles City Council denied a Historic-Cultural Monument nomination, which means it is ineligible for listing in the local register of historical resources. The City Council findings; however, only pertained to the local register and not the federal or state registers of historical resources. Thus, Teresa Grimes | Historic Preservation (TGHP) was retained to evaluate the Project Site on an intensive level to determine if it is eligible for listing in the National Register of Historic Places and/or California Register of Historical Resources.

After careful inspection, investigation, and evaluation, TGHP concluded that neither the Project Site collectively nor any of the buildings, structures or sites individually are eligible for listing in the National Register of Historic Places and California Register of Historical Resources for lack of historical significance and architectural distinction. The recommended Status Code is 6Z, ineligible for listing in federal, state, and local registers of historical resources through survey evaluation. Thus, the Project Site does not qualify as a historical resource as defined by the California Environmental Quality Act.

1. INTRODUCTION

1.1 PURPOSE

The purpose of this report is to analyze whether a proposed project (Project) would impact historical resources defined by the California Environmental Quality Act (CEQA). CEQA defines a historical resource as a property listed in or determined to be eligible for listing in the California Register of Historical Resources.¹ The Project is located at 5300 Oakdale Avenue (Project Site) in the Encino - Tarzana Community Plan Area (CPA) of the City of Los Angeles. The Project Site is situated on the east side of Oakdale Avenue at the corner of Collier Street (see **Figure 1**). It is approximately 14 acres in size and includes four Assessor Parcel Numbers, which are listed below:

- APN 2164-008-001 is Lot 2 of Tract No. 10515 (9.81 acres)
- APN 2164-008-005 is a portion of Lot 36 of Tract No. 2605 (0.30 acres)
- APN 2164-008-006 is a portion of Lot 37 of Tract No. 2605 (1.96 acres)
- APN 2164-008-007 is a portion of Lots 36 and 37 of Tract No. 2605 (1.92 acres)

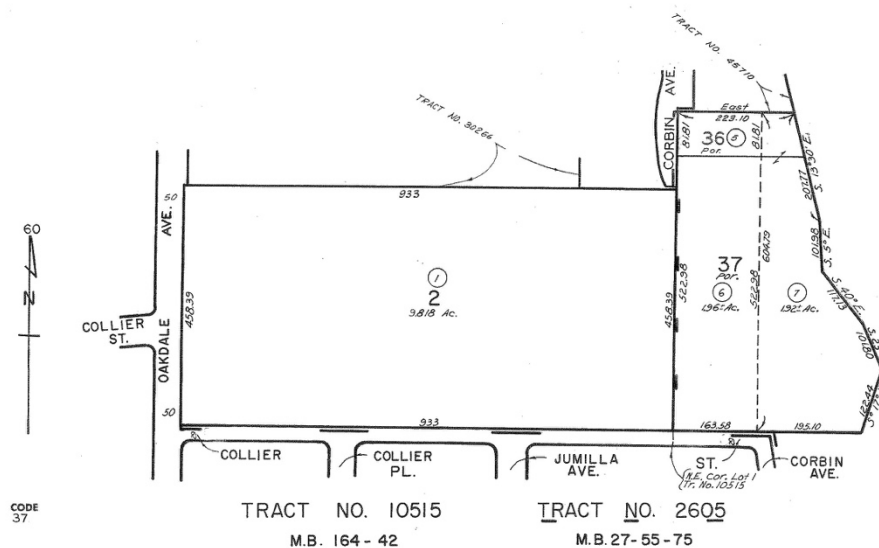


Figure 1: Assessor Parcel Map of Project Site.

APN 2164-008-001 is occupied by a single-family house and a citrus grove; APN 2164-008-007 is occupied by a storage building; and APN 2164-008-006 is occupied by a variety of ancillary buildings. The Project Site is commonly known as Bothwell Ranch, so named for Lindley F. Bothwell, the patriarch of the family who once owned the property. A proposed project (Project) would involve the redevelopment of approximately ten acres as 21 single-family lots and the donation of approximately four acres to the Mountains Recreation & Conservation Authority (MRCA). All of the buildings would be removed pursuant to City of Los Angeles

¹ Public Resources Code § 21084.1

Department of Building and Safety requirements. One new one-story building would be constructed on the MRCA site.

1.2 QUALIFICATIONS OF PREPARER

Teresa Grimes | Historic Preservation (TGHP) was retained to prepare this report. Ms. Grimes fulfills the qualifications for a historic preservation professional outlined in Title 36 of the Code of Federal Regulations, Part 61. Her résumé is included in **Appendix A**.

1.3 PREVIOUS DESIGNATIONS AND EVALUATIONS

The following sources were consulted to determine if the Project Site is currently designated under federal, state, or local landmark or historic district programs or previously evaluated as a potential historical resource:

1. The Built Environment Resources Directory (BERD) is managed and maintained by the State Office of Historic Preservation (OHP). The BERD includes properties listed and determined to be eligible for listing in the National Register of Historic Places, listed and determined to be eligible for listing in the California Register of Historical Resources, designated California Registered Historical Landmarks, and designated California Points of Historical Interest. The BERD also includes information on properties evaluated in historic resource surveys and properties subject to federal and state environmental laws processed through OHP. This research revealed the Project Site is not included in the BERD.
2. The Los Angeles Historic Resources Inventory website, HistoricPlacesLA.org, is managed and maintained by the Los Angeles Office of Historic Resources (OHR). It includes properties designated as Los Angeles Historic-Cultural Monuments (HCM) or located within designated Historic Preservation Overlay Zones (HPOZ). This research revealed that the Project Site is not a designated HCM or located within a designated HPOZ.
3. The findings of SurveyLA, the citywide historic resource survey of Los Angeles, are also included in HistoricPlacesLA.org as well as individual survey reports for each Community Plan Area (CPA). This research revealed the Project Site was identified by SurveyLA in 2012 as appearing eligible for federal, state, and local landmark designation “as one of the last remaining family-owned commercial citrus groves in the San Fernando Valley.”
4. The Zone Information and Map Access System (ZIMAS) is maintained by the Department of City Planning. Designated historical resources can also be identified through ZIMAS under the Planning and Zoning/Historic Preservation Review tab. This research revealed that the Project Site was nominated as an HCM in 2019 but denied by the Los Angeles City Council in 2022.

1.4 AREA OF POTENTIAL IMPACT

A preliminary field inspection of the Project Site and surrounding area was also conducted to determine the scope, or Area of Potential Impact (API), of the report. The API is the geographic area within which a project may directly or indirectly impact the character of historical resources. In determining the API, three factors were considered: the existing setting of the Project Site; the scale and nature of the proposed development relative to the existing setting; and the impacts the Project could have on historical resources identified within the API.

The Project Site is located in a RA-1 Zone and is surrounded single-family residential neighborhoods. Directly south of the Project Site on Collier Street is the CHIME Institute's Schwarzenegger Community School. As the proposed Project would be consistent with pattern and scale of the surrounding development, the API for the report was limited to the Project Site. Historical resources, beyond the Project Site were eliminated from inclusion within the API because the Project would have no potential for direct or indirect impacts. The Project would blend into the existing built environment and would therefore have no adverse effect on their physical integrity.

1.5 METHODOLOGY

As the Encino - Tarzana CPA historic resource survey is over five years old, TGHP determined that the Project Site should be evaluated on an intensive level to determine if any of the buildings, structures, or sites collectively or individually qualify as historical resources as defined by CEQA. To evaluate the Project Site as a potential historical resource, TGHP performed the following tasks:

1. Conducted an intensive field inspection of the Project Site, during which the general condition and physical integrity of the buildings, structures, and sites was assessed. Digital photographs were taken during the field inspection.
2. Determined that the Project Site should be evaluated individually as a potential historical resource according to National Park Service, State Office of Historic Preservation, and Los Angeles Office of Historic Resources standards. The area in which the Project Site is located was not identified as a potential historic district by SurveyLA. During the field inspection, it was determined that there were not enough properties with shared physical characteristics or historical associations in the area to form a potential historic district.
3. Conducted research using a variety of primary and secondary materials to establish the development history of the Project Site as well as the contexts in which it should be evaluated. Sources included, but were not limited to, online sources, published literature in local and regional history, city directories, historic aerial photographs, newspaper archives, and maps. The City of Los Angeles Department of Building and

Safety did not have building permits for any of the improvements on the Project Site. Additional sources included interviews with members of the Bothwell family.

4. Consulted the Context/Theme/Property Type (CTP) eligibility standards formulated for the *Los Angeles Citywide Historic Context Statement (LACHCS)* to identify the appropriate CTPs under which to evaluate the Project Site.
5. Reviewed and analyzed ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation designations, and assessment processes and programs to evaluate the significance and integrity of the Project Site as a potential historical resource.

2. REGULATORY FRAMEWORK

2.1 HISTORICAL RESOURCES UNDER CEQA

CEQA defines a historical resource as a property listed in the California Register of Historical Resources (California Register) or determined to be eligible for listing in the California Register by the State Historical Resource Commission. The California Register automatically includes properties listed and formally determined to be eligible for listing in the National Register of Historic Places (National Register) as well as some California State Landmarks and Points of Historical Interest. A property designated under a local preservation ordinance or identified as eligible in a historic resource survey is presumed to be a historical resource unless a preponderance of evidence demonstrates that the property is not architecturally, historically, or culturally significant.² The lead agency has the discretion to treat a property as a historical resource if it meets statutory requirements and substantial evidence supports the conclusion. Thus, there are three categories of historical resources:

- *Mandatory historical resources* are properties listed or determined to be eligible for listing in the California Register by the State Historical Resource Commission.³
- *Presumptive historical resources* are properties included in a local register of historical resources as defined by subdivision (k) of Section 5020.1 of the Public Resources.⁴ Presumptive historical Resources may also include properties deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 of the Public Resources Code, unless a preponderance of the evidence demonstrates that the resource is not significant. Subdivision (g) pertains to the requirements of nomination historic resource surveys for listing in the California Register.⁵

² Public Resources Code § 5024.1 and Title 14 California Code of Regulations § 4850 & § 15064.5 (a) (2).

³ Title 14 California Code of Regulations § 15064.5 (a) (1).

⁴ A local register of historical resources is defined as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

⁵ A resource identified as significant in a historical resource survey may be listed in the California Register if the survey meets all of the following criteria:

- *Discretionary historical resources* are properties determined to be eligible for listing in the California Register by the lead agency. The determination must be supported by evidence in light of the whole record.⁶

The National Register, California Register, and Los Angeles designation programs are discussed below.

2.2 NATIONAL REGISTER OF HISTORIC PLACES

The National Register is "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."⁷

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:⁸

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.

The survey has been or will be included in the State Historic Resources Inventory.

1. The survey and the survey documentation were prepared in accordance with office procedures and requirements.
2. The properties were evaluated and determined by the office (SHOP) to have a significance rating of Category 1 to 5 on DPR Form 523.
3. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the integrity of the resource.

⁶ Title 14 California Code of Regulations § 15064.5 (a) (3) (4).

⁷ Title 36 Code of Federal Regulations Part 60.2.

⁸ Title 36 Code of Federal Regulations Part 60.4.

Historic Districts

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”⁹

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.¹⁰ A district’s significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.¹¹

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.¹²

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be

⁹ Ibid.

¹⁰ Title 36 Code of Federal Regulations Part 60.3 (d).

¹¹ *National Register Bulletin #21: Defining Boundaries for National Register Properties* (Washington D.C.: U.S. Department of the Interior, 1995), 12.

¹² *National Register Bulletin #16: How to Complete the National Register Registration Form* (Washington D.C.: U.S. Department of the Interior, 1997), 16.

judged only when it is evaluated within its historic context. Historic contexts are “those patterns or trends in history by which a specific...property or site is understood and its meaning...is made clear.”¹³ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in *National Register Bulletin #15* as “the ability of a property to convey its significance.”¹⁴ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

2.3 CALIFORNIA REGISTER OF HISTORICAL RESOURCES

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.¹⁵

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

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 770 onward; and
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion on the California Register.¹⁶

¹³ Patrick Andrus and Rebecca Shrimpton, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: U.S. Department of the Interior, 1997), 7.

¹⁴ *National Register Bulletin #15*, 44.

¹⁵ Public Resources Code § 5024.1 (a).

¹⁶ Public Resources Code § 5024.1 (d).

Criteria and Integrity

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.¹⁷

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. It is possible that properties may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. An altered property may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.¹⁸

SOHP Survey Methodology

The evaluation instructions and classification system prescribed by the SOHP for recording historical resources provide a Status Code for use in classifying potential historical resources. In 2003, the Status Codes were revised to address the California Register. These Status Codes are used statewide in the preparation of historical resource surveys and evaluation reports. The first code is a number that indicates the general category of evaluation. The second code is a letter that indicates whether the property is separately eligible (S), eligible as part of a district (D), or both (B). There is sometimes a third code that describes some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.

¹⁷ Public Resources Code § 5024.1 (c).

¹⁸ Title 14 California Code of Regulations § 4852 (c).

3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

The specific Status Codes referred to in this report are as follows:

- 3S** Appears eligible for the National Register as an individual property through survey evaluation.
- 3CS** Appears eligible for the California Register as an individual property through survey evaluation.
- 5S3** Appears to be individually eligible for local listing or designation through a survey evaluation.
- 6Z** Found ineligible for National Register, California Register, or local designation through survey evaluation.

2.4 LOS ANGELES CULTURAL HERITAGE ORDINANCE

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. A monument is any site, building, or structure of particular historic or cultural significance to the City of Los Angeles and may be designated if it meets at least one of the following criteria:

1. The proposed HCM 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; or
2. The proposed HCM is associated with the lives of historic personages important to national, state, city, or local history;

3. The proposed HCM 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.¹⁹

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

2.5 LOS ANGELES HISTORIC PRESERVATION OVERLAY ZONE ORDINANCE

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zones (HPOZs) in 1979; Angelino Heights became Los Angeles' first HPOZ in 1983. A HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. According to Section 12.20.3 of the City of Los Angeles Municipal Code, the criteria for the designation of a HPOZ are:

1. Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time; or
2. Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or
3. Retaining the building, structure, landscaping, or natural feature, would contribute to the preservation and protection of a historic place or area of historic interest in the City.²⁰

2.6 LOS ANGELES GENERAL PLAN CONSERVATION ELEMENT

The City of Los Angeles General Plan includes a Conservation Element. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes a policy to continue to protect historical and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.

¹⁹ Los Angeles Administrative Code § 22.171.7.

²⁰ Ordinance No. 184903, accessed October 1, 2020,

https://preservation.lacity.org/sites/default/files/Citywide%20HPOZ%20Ordinance_current_1.pdf.

3. ENVIRONMENTAL SETTING

3.1 BRIEF HISTORY OF THE AREA²¹

Although the San Fernando Valley is often thought of in terms of widespread, post-World War II suburban expansion, the south San Fernando Valley (where Encino and Tarzana are located) has a rich development history that spans the previous two centuries. The majority of the area was once part of the San Fernando Mission lands. While there are no resources remaining from the Mission era within the area, the Spanish explorers and friars established El Camino Real, the path connecting the missions, generally along the route now occupied by Ventura Boulevard. This road in its many incarnations has operated as a major thoroughfare since the late eighteenth century and continues to serve as the dominant commercial artery of the south San Fernando Valley.

In the mid-nineteenth century, the area was part of the large Rancho El Encino (sometimes called the Rancho Los Encinos), a 4,500-acre landholding situated between the Los Angeles River and the Santa Monica Mountains. The name Encino, which persists today, was derived from the Spanish word for oak in reference to the native Valley Oak and Coastal Live Oak trees that thrived in the area. A cluster of buildings from Rancho El Encino, including the Vicente de la Osa adobe (built 1849) and the Garnier building and blacksmith shop (built circa 1870), are situated around a natural spring near the intersection of Ventura Boulevard and Balboa Avenue in what is now Los Encinos State Historic Park.²²

By the turn of the twentieth century, the area remained sparsely populated and predominantly agricultural, with an abundance of fruit and walnut orchards, grazing lands and wheat fields. The first major developmental changes began in the 1910s in anticipation of the construction of the 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. Anticipating the eventual real estate boom of the San Fernando Valley, landowners began to plat and prepare for residential settlement and commercial development. The Los Angeles Suburban Homes Company, headed by *Los Angeles Times* publisher Harrison Gray Otis, purchased large tracts of land throughout the area and other newly annexed sections of the Valley. Before dividing the land, the partners of the company chose acreage for themselves. Otis later sold his acreage to Tarzan author Edgar Rice Burroughs in 1919. Burroughs created the community of Tarzana out of his property.²³

²¹ Adapted from Architectural Resources Group, "Historic Resource Survey Report: Encino-Tarzana Community Plan Area," *SurveyLA Los Angeles Historic Resource Survey* (City of Los Angeles Office of Historic Resources, February 2013), 8-12.

²² Kevin Roderick, *The San Fernando Valley: America's Suburb* (Los Angeles: Los Angeles Times Books, 2002), 197-198.

²³ John Taliaferro, *Tarzan Forever* (New York: Simon and Schuster, 1999), 152-156.

The south San Fernando Valley felt the effects of the boom of the 1920s, which had a tremendous impact on the development of Los Angeles as a whole. The 1920s saw major road improvements in the Valley, including work on the Cahuenga Pass and, later, the Sepulveda Tunnel, which provided vehicular access between the San Fernando Valley and West Los Angeles. This coincided with the paving of Ventura Boulevard and the establishment of Mulholland Drive. Improved vehicular access spurred residential development in the southeast San Fernando Valley. Sherman Oaks Circle, which is located at the far eastern edge of the Survey Area, was subdivided in the 1920s. Though it was not entirely built out until the postwar era, the platting of Sherman Oaks Circle near the Sepulveda Tunnel and adjacent to Ventura Boulevard is indicative of the impact of these improvements on the development of the area.

Despite a surge of residential development in the eastern communities of the San Fernando Valley in the 1920s, Encino and Tarzana remained somewhat rural due to their relatively remote location. As such, these areas became attractive to potential homeowners seeking large properties and a quiet, rustic lifestyle while remaining within Los Angeles city limits. Melody Acres, a 1920s subdivision in Tarzana north of Ventura Boulevard, featured large lots with rows of citrus trees and equestrian zoning. The former Amestoy family ranch in Encino was also subdivided for residential development and called Encino Acres. This subdivision, which was located north of Ventura Boulevard between Balboa and White Oak Avenues, featured lots that ranged in size between two and 20 acres. Properties were used for country estates, hobby ranching, and farming, including the cultivation of lemons, oranges, and walnuts. The residences and some ancillary buildings from these properties remain in the center of blocks that were later carved up into smaller lots, forming a distinctive pattern of parcels in the Encino Acres subdivision.

After floods ravaged the south San Fernando Valley in 1938, the city began channelizing the Los Angeles River and set aside the Sepulveda Basin in the northeast of the Survey Area as a flood control area. The Army Corps of Engineers designed the Sepulveda Dam, completed in 1941. A small golf course opened in the basin in 1941, but the area remained in the control of the Army for next decade. The flood control infrastructure greatly reduced the risk of catastrophic flooding in the San Fernando Valley and made the area more desirable for wide-spread residential development and federally insured home loans.

The demand for housing following World War II was central to the development of Encino and Tarzana. In the five years between 1945 and 1950, the population of the San Fernando Valley doubled to just over 400,000. Anticipating postwar growth, the City initially planned for the development of the Valley to follow prevailing regional planning principles, with small urban employment centers and residential subdivisions surrounded by agricultural land. Two planning documents—a 1943 Master Plan and a 1944 Zoning Plan—called for the retention of agricultural zones around self-contained urban communities with designated industrial and commercial areas to supplement the agricultural economy and supply employment for present

and future residents.²⁴ However, due to the area's exponential growth and unprecedented demand for housing, agricultural land was quickly converted into residential subdivisions and the plans were never fully realized.

The postwar boom brought tremendous change to the character of the Encino and Tarzana communities. Large residential subdivisions cropped up on both sides of Ventura Boulevard and, as the demand grew, land value skyrocketed. Fragmented urban development encroached on orchards and ranches. As a result, farmers could no longer make enough profit to cover rising property taxes, and most were forced to downsize or sell. The opening of the 101 and 405 Freeways in the early 1960s further bolstered suburban growth, connecting the area to many of the Downtown and Westside business districts in Los Angeles and relieving congestion on city streets. Single family residential development continued south into the hills of the Santa Monica Mountains during the late 1950s through the 1970s.

A long history of racially restrictive housing and ownership practices meant that most of the Valley remained “a thoroughly white domain” even through the post-World War II boom. Author Kevin Roderick observed that restrictive covenants had factored into patterns of town building and settlement going back to the Valley's earliest history.²⁵ With the exceptions of Pacoima and San Fernando in the northern Valley, which were relatively ethnically diverse from the early twentieth century, members of ethnic minorities who resided in the San Fernando Valley were generally confined to segregated areas. Beginning in 1922, any property sold in Tarzana had a restriction within the deed stating, “that said premises, or any part thereof shall not be leased, sold, or conveyed to or occupied by any person not of the Caucasian race.”²⁶ Deed restrictions like these were common throughout the greater San Fernando Valley and were not effectively eliminated until well into the 1970s.²⁷

Despite the prevalence of restrictive housing practices, many of the young families flocking to the area in the postwar period were Jewish. The Jewish population was more easily able to obtain housing in middle-class suburban neighborhoods than other “non-white” racial groups and in the decade following World War II the Jewish population of the San Fernando Valley doubled.²⁸ This influx led to the doubling or tripling in size of existing Valley congregations and the opening of new congregations, including Valley Beth Shalom on Ventura Boulevard in Encino.²⁹ Many of the Jewish residents of the area resisted the discrimination and isolation of Jewish communities in other parts of Los Angeles and sought to assimilate into the suburban

²⁴ Mary Corbin Sies and Christopher Silver, *Planning the Twentieth-Century American City* (Baltimore: Johns Hopkins University Press, 1996), 258.

²⁵ Roderick, 139-140.

²⁶ Catherine Jurca, *White Diaspora: The Suburb and the Twentieth Century American Novel* (Princeton: Princeton University Press, 2001), 42.

²⁷ Josh Sides, L.A. City Limits, *African American Los Angeles from the Great Depression to the Present* (Berkeley: University of California Press, 2003) 104, 193.

²⁸ George J. Sanchez, *Beyond Alliances: The Jewish Role in Reshaping the Racial Landscape of Southern California* (West Lafayette: Purdue University Press, 2012), 43.

²⁹ Lawrence Jorgenson, *The San Fernando Valley: Past and Present* (Los Angeles: Pacific Rim Research, 1982), 191-192.

American lifestyle. In 1956, Jewish businessman Bernard Shapiro purchased El Caballero Country Club in Tarzana and made it one of the first country clubs in Los Angeles to allow both Christian and Jewish members.³⁰

3.2 PROJECT SITE HISTORY AND DESCRIPTION

Development History

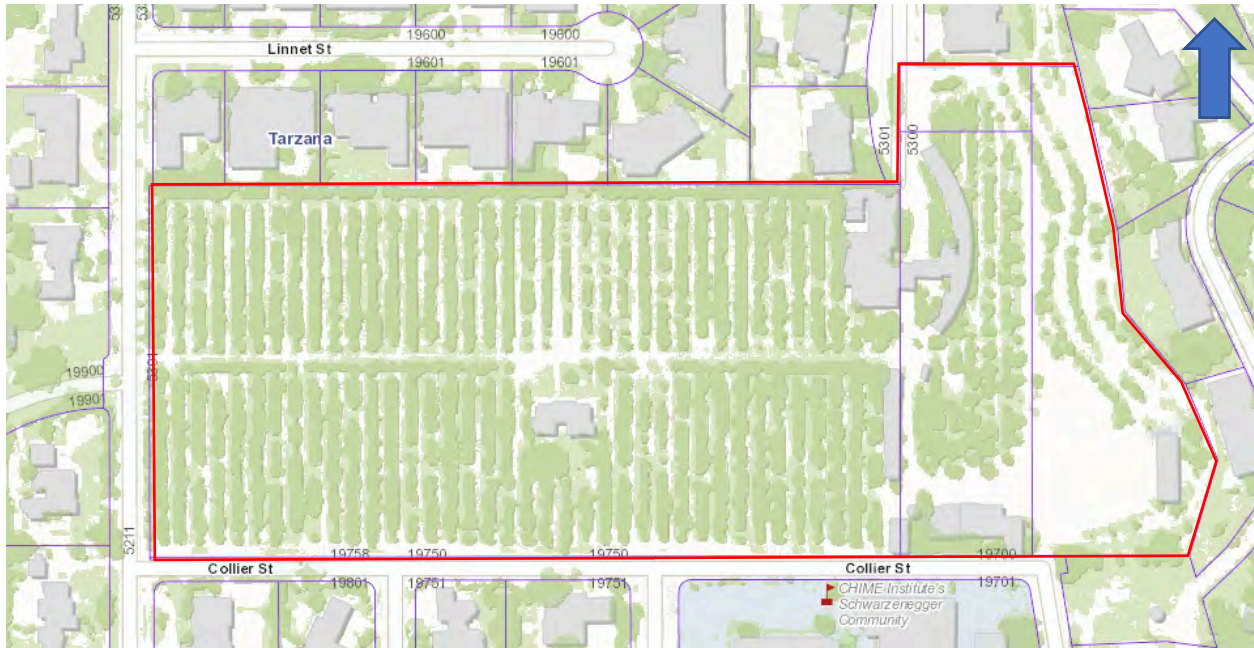


Figure 2: Project Site outlined in red, base map courtesy of the Los Angeles County Office of the Assessor.

The modern origins of the Project Site can be traced to the subdivision of Tract No. 2605 in 1914 by the Title Insurance and Trust Company. At that time, Ventura Boulevard was still called Ventura County Road. Most of the existing side streets, including Oakdale Avenue, had been laid out. Sometime after 1914, Henry R. Bristol, Sr. (1855-1928) purchased the lots (Lots 35, 39, 40, 41, 42, 43, and 44, see **Figure 4**) along Oakdale Avenue from Ventura Boulevard on the north to Wells Drive on the south.³¹ The combined acreage of the lots was approximately 70. Bristol and his wife, Ella had been living in Santa Ana since 1882.³² He was a pharmacist as was his father before him.³³ By 1916, he had sold his business and the family had moved to the San Fernando Valley.³⁴

³⁰ Scott Harris, "A Rich Man with a Social Conscience," *Los Angeles Times*, April 18, 1998.

³¹ "Spec House Story Stirs Memories," *Los Angeles Times*, April 1, 1979, and Tract Map No. 2605.

³² "Ella Bristol obituary," *Santa Ana Register*, June 25, 1924.

³³ "Bristol Avenue & H.R. Bristol," O.C. History Roundup, accessed on April 12, 2022, <https://ochistorical.blogspot.com/2016/12/bristol-avenue-hr-bristol.html>

³⁴ "Home Wedding," *Santa Ana Register*, October 18, 1916.

The earliest available aerial photograph of the Project Site vicinity dates from 1928 (see **Figure 5**). At that time, the 70 acres was planted with citrus trees. The photograph also depicts two clusters of buildings, one on the north with a driveway from Ventura Boulevard and one on the south with access from Wells Drive. The cluster on the north included the home of Henry and Ella Bristol, Sr. According to the 1920 U.S. Census, their address was 251 Ventura Road. In 1924, they are listed in the Los Angeles City Directory at 19730 Ventura Boulevard.³⁵ The cluster on the south included the home of their eldest son, Henry Bristol, Jr.³⁶ The 1920 U.S. Census identified the property as 252 Wells Drive. The address eventually changed to 19801 W. Wells Drive.

Ella Bristol died in 1924 and Henry, Sr. in 1928. In 1926, Samuel and Myra Bothwell agreed to a future acquisition of a portion of Lots 40 and 41 of Tract No. 2605 owned by Henry Bristol Sr.³⁷ In 1929, the heirs of the Bristol estate sold the remaining property to a group of buyers including Samuel, Myra, Lindley, and Marion Bothwell; Paul J. Howard and Alaseba Howard; and Nels and Anette K. Nelson. The property was subdivided as Tract No. 10515 and included six lots (see **Figure 6**). The Howard family bought the former home of Henry Bristol Jr. on Wells Drive, which became Lot 1 of Tract No. 10515.³⁸ Howard was in the nursery business and may have used the property as a weekend getaway as the family was still listed at 900 S. Rimpau Boulevard from 1930 and 1942.³⁹

By 1934, Lindley F. Bothwell and his first wife Marion Seale Bothwell were living on Lot 2 of Tract No. 10515, which was already planted with citrus trees. Lot 3 to the north was owned by other members of the Bothwell family but may have been managed by Lindley.⁴⁰ In 1930, Lindley and Marion were living in Beachwood Canyon, and he was working in the orange business.⁴¹ Thus, it appears that he owned Lot 2, but had not yet made the San Fernando Valley his home. The Los Angeles County Office of the Assessor estimates the date of construction of the house as 1934. This date is confirmed by the fact that Marion Seale Bothwell was registered to vote at this address.

Bothwell purchased a few acres of Lots 36 and 37 of Tract No. 2605 east of the grove around 1940. By that time, there was a driveway bisecting the grove and a house on the south side of the driveway in the approximate center. In addition, Bothwell had constructed what appear to be garages, sheds, and a pergola type structure on the southeastern portion of the Project Site (see **Figure 7**). These buildings apparently supported his diverse businesses. Beginning in the

³⁵ According to the 1930 U.S. Census, Sidney Fletcher moved into the former home of Henry Bristol Sr. and farmed the property. By 1960, the buildings were demolished and replaced with a shopping center.

³⁶ The address of the property is 19801 W. Wells Drive, and the house remains but is not visible from the public right-of-way.

³⁷ Quit Claim Deed recorded on February 17, 1930, between Citizens National Trust & Savings Bank of Los Angeles and Samuel and Myra Bothwell.

³⁸ Beginning in 1930 the Howards start to improve the property; 1930LA19021 P.J. Howard 11 x 24 addition to house Lot 1 of Tract 10515 and 1930LA05526 P.J. Howard private lounge for tennis court.

³⁹ 1930 and 1940 U.S. Census; 1942 World War II Draft Registration Card.

⁴⁰ Lot 3 was sold and subdivided for single-family lots in 1965.

⁴¹ 1930 U.S. Census.

1940s, there are numerous sources that chronical Bothwell's' car collecting activities; however, no new buildings or structures were added through 1944 (see **Figure 8**). In 1947, Bothwell constructed a storage shed for the collection at the easternmost portion of the Project Site, which had not yet been planted with citrus trees (see **Figure 9**).⁴²

A fire on the Project Site in 1949 destroyed a portion of the car collection as well as the buildings in which the cars were stored.⁴³ These were apparently the garages, sheds, and pergola type structure on the southeastern portion of the Project Site as they are no longer present in the 1952 photograph (see **Figure 10**).

The group of buildings on the northeastern portion of the Project Site were constructed between 1952 and 1964 (see **Figures 10, 11, and 12**). The train station and storage shed with tracks on Lot 36 were constructed by 1978 for the train collection (see **Figure 14**). The 1978 photograph also documents that the grove was beginning to decline. There are numerous trees that had been removed. By 1980, the trees were virtually gone and by 1985 the grove had been entirely replanted (see **Figures 15 and 16**).

There are approximately 1,500 citrus trees on the Project Site currently, which are predominately Valencia oranges. There are also a few other citrus trees including Naval oranges and grapefruit cultivars. The grove has not been managed or operated as a commercial business since 2016. A report prepared on November 8, 2019 by Brian Neufeld described a combination of healthy and sick trees suffering from disease and lack of water.

Architectural Description



Figure 3: Buildings and structures on Project Site outlined in white, base map courtesy of Google.

⁴² Los Angeles County Office of the Assessor and 1947 historic aerial photograph.

⁴³ "Fire Destroys Antique Autos Used in Films," *Los Angeles Times*, February 5, 1949.

The Project Site is approximately 14 acres in size and generally divided into western and eastern portions. The western portion is the larger of the two and includes APN 2164-008-001, which is 9.81 acres in size. The land is relatively flat and planted with evenly spaced citrus trees in rows with a north-south orientation. Bisecting the grove is a gravel driveway, which begins on Oakdale Avenue and terminates in a surface parking area on the eastern portion (see **Figure 17**). The eastern portion includes APNs 2164-008-005, 006, and 007, which is 4.18 acres in size. The topography rises from west to east. In addition to the surface parking area, there are a variety of buildings and structures with citrus trees planted sporadically in the eastern portion.

On the south side of the driveway in the approximate center of the grove is a single-family house constructed in circa 1934 (see **Figure 18**). The house has a wood-framed structure and U-shaped configuration sheathed in channel rustic wood siding. The open end of the U faces south toward the backyard. The west wing of the U is two stories in height and covered by a hipped roof, the east wing is one-story in height and covered by a rear-facing gabled roof, and the connecting middle wing is one-story in height and covered by a side-facing gabled roof. The roofs have shallow overhanging eaves with exposed rafter tails. The primary (north) façade is organized asymmetrically. The main entrance is located in the middle wing within a projecting front porch. A projecting balcony extends along the second story of the west wing. Windows throughout the house are mostly multi-paned wood casements set in pairs. Similarly designed French doors open on to the balcony as well as the rear patio. Some wood windows have been replaced with vinyl and aluminum sliders. The front yard is separated from the driveway by a low brick garden wall. Brick is also used as a paving material for the walkways, front porch, and rear patio. The yard is fenced on all sides, vinyl picket on the front and chain link on the sides and rear.

At the northeastern corner of the grove is a two-story multi-purpose building constructed between 1952 and 1964 (see **Figure 19**). The first floor was used as a workshop and car storage, while the second floor as an office and caretaker's quarters. The building has a wood-framed structure with various components indicating it was constructed in phases. The roofs are mostly side-facing gables with overhanging eaves and exposed rafter tails. The exterior is clad with board-and-batten wood siding. The fenestration is irregular and the patches in the siding and variety of doors and windows suggest changes over time. There is an assortment of window sizes, types, and materials including wood awning and aluminum sliding sash. There are shed roof lean-tos on the north and south. The one on the north is enclosed with corrugated metal siding. South of the multi-purpose building are two water storage tanks.

East of the multi-purpose building is the train station and storage shed constructed around 1978 (see **Figures 20, 21, and 22**). The station is a wood-framed structure with a T-shaped configuration covered by an intersecting gabled roof. The roof is characterized by overhanging eaves with exposed rafters. Board and batten wood siding clads most of the building, but the pattern changes on the west façade. The east façade appears to be the most intact with a wood paneled door and double-hung wood sash windows. Other windows include aluminum sliding sash. Attached to the west façade is a gabled roof lean-to that appears to have originally been

freestanding. The storage shed is a crescent-shaped structure with a wood frame and corrugated metal roof.

At the southeastern corner of the grove is two-story building that was used for car storage (see **Figure 23**). The building has a wood-framed structure, gabled roof, and long rectangular shape with a north-south orientation. The exterior, including the roof, is covered with sheets of corrugated metal; however, board and batten wood siding is visible in the gable face of the north façade. There is a car ramp on the south leading to large sliding doors on the second story.

Further southeast is another water storage tank and cluster of corrugated metal sheds (see **Figure 24**).

At the easternmost side of the Project Site is another car storage building two-stories in height (see **Figure 25**). Constructed in circa 1947, the building has a wood-framed structure and long rectangular shape with a north-south orientation. The exterior, including the roof, is covered with sheets of corrugated metal. There are large swing doors along the first story of the west façade and four single-paned windows spaced evenly along the second story. There is a car ramp at the south end leading to large sliding doors on the second story.

4. HISTORIC CONTEXTS

The significance of a property must be evaluated within its historic context(s). Historic contexts are those patterns or trends in history by which a specific property is understood. The *Los Angeles Citywide Historic Context Statement (LACHCS)* was used to identify the relevant contexts for judging the significance of the Project Site. The *LACHCS* is organized into nine broad contexts that cover the period from 1850 to 1980 and are specific to Los Angeles. Within each context, important themes and sometimes sub-themes in the City's history are explored. The most relevant contexts for the evaluation of the Project Site are the Industrial Development context and the Architecture and Engineering context. The associated themes, sub-themes, and eligibility standards are summarized below.

4.1 CASH CROPS FOR EXPORT⁴⁴

In 2012, the Project Site was identified and evaluated by SurveyLA in the Agricultural Roots Theme of the Industrial Development Context. Properties evaluated under this theme may be significant in the area of Agriculture. Some properties may also be significant in the areas of Ethnic Heritage and/or Architecture. Cash crops, particularly citrus, were among the most important agricultural products cultivated in Los Angeles in the late nineteenth and early twentieth centuries. With technological advancements in irrigation, shipping, and refrigeration, citrus became the highest valued crop produced in the region between 1890 and 1938,

⁴⁴ Adapted from "Context: Industrial Development, 1850-1980," *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, December 2015), 24, 26-27.

supplemented by olives and flowers and bulbs. Imagery surrounding the production of cash crops was key to marketing the bounty of Los Angeles produce to consumers nationwide. Cash crops are also associated with the history of many ethnic/cultural groups who worked in the fields, farms, and packing houses harvesting and packing fruits, vegetables, bulbs, and flowers. Extant properties related to cash crop industries may include packing houses, cooperative associations, remnants of groves or orchards, and olive vats and tanks.

Remnants of groves and orchards may be significant for their association with cash crop agricultural production in Los Angeles. They represent the last vestiges of a once expansive agricultural landscape in Los Angeles, and very few properties remain that are associated with cash crop agriculture in the city. Groves and orchards, particularly those that do not have a related agricultural building, may not have a strong enough association to be eligible for the National Register or California Register although they may meet local significance thresholds. The eligibility standards for the grove/orchard property type are found in **Table 1**.

TABLE 1: GROVE/ORCHARD
Context: Industrial Development, 1850-1980
Theme: Agricultural Roots, 1850-1965
Subtheme: Cash Crops for Export, 1870-1945
Property Type: Grove/Orchard
Eligibility Standards
<ul style="list-style-type: none"> • Planted within the period of significance • Retains ability to convey historic association from the period of significance • Retains most of the essential physical features from the period of significance
Character-Defining/Associative Features
<ul style="list-style-type: none"> • Concentration of numerous mature citrus or deciduous trees planted with ordered spacing characteristic of cultivated grove or orchard • Is large enough to convey a historically rural setting • Typically associated with a least one additional agricultural building or landscape feature (may include a farm/ranch house; outbuilding, land, cooperative association office, or packing house)
Integrity Considerations
<ul style="list-style-type: none"> • Should retain integrity of Location, Setting, Feeling, and Association • Original trees may have been replaced over time as their productivity decreased, as long as the historical configuration of trees is intact, and the majority of existing trees are mature

4.2 THE RANCH HOUSE⁴⁵

Within the Architecture and Engineering context, the single-family house on the Project Site is best evaluated within The Ranch House theme and the Traditional Custom Ranch House sub-theme. The other buildings and structures on the Project Site are utilitarian in design, and there are no themes or sub-themes in the Architecture and Engineering context applicable for their evaluation as historical resources.

Single-family houses evaluated under Traditional Custom Ranch House sub-theme may be significant in the area of Architecture. Eligible houses will be significant for the quality of their architecture and will be important individual examples that exemplify the Traditional Ranch style and the Ranch house type. Often described as resembling the “quintessential Ranch house,” the Traditional Ranch style is distinguished by its rusticated appearance and incorporation of elements reminiscent of the vernacular, nineteenth century buildings of California and the American West. It was the Traditional Ranch aesthetic that was widely disseminated in popular magazines and replicated across the nation. Eligible examples are custom designed, were typically designed by a noted architect, and stand out as among the best examples of the style. These characteristics help to distinguish Traditional Custom Ranch houses from the scores of mass-produced tract houses designed in the Traditional Ranch style. The eligibility standards for Traditional Custom Ranch houses are in **Table 2**.

TABLE 2: TRADITIONAL CUSTOM RANCH HOUSE	
Context: Architecture and Engineering, 1850-1980	
Theme: The Ranch House, 1930-1975	
Sub-theme: Traditional Custom Ranch House, 1930-1975	
Eligibility Standards	
<ul style="list-style-type: none"> • Was constructed during the period of significance 	
<ul style="list-style-type: none"> • Is an important individual example that exemplifies the Traditional Ranch style and Ranch house type 	
<ul style="list-style-type: none"> • Was custom designed (as opposed to mass-produced) 	
Character-Defining/Associative Features	
<ul style="list-style-type: none"> • 1,500 – 3,500 square feet in size 	
<ul style="list-style-type: none"> • Asymmetrical informal composition with one or more wings 	
<ul style="list-style-type: none"> • Attached garages, often forming one wing 	
<ul style="list-style-type: none"> • Brick and stone chimneys 	
<ul style="list-style-type: none"> • Close relationship to its yard 	
<ul style="list-style-type: none"> • Dutch doors 	
<ul style="list-style-type: none"> • Eaves with exposed rafter tails 	
<ul style="list-style-type: none"> • Exposed post and beam construction 	

⁴⁵ Adapted from “Context: Architecture and Engineering, 1850-1980; Theme: The Ranch House, 1930-1975,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, December 2015), 21-22.

TABLE 2: TRADITIONAL CUSTOM RANCH HOUSE
• French doors
• Gabled roof, originally shingled
• Garage door with barn door crossing brace
• One or two stories in height
• Shutters
• Sliding glass doors
• Two-story versions can include Monterey Colonial elements
• Typically designed by a well-known architect
Integrity Considerations
• Should retain integrity of Location, Design, Materials, Workmanship
• Roof line alterations are not acceptable
• Additions are allowed if not visible within public view

4.3 LINDLEY F. BOTHWELL

Lindley Fowler Bothwell (1901-1986) was born in Los Angeles in 1901 to Samuel Fowler Bothwell and Myra Josephine Lindley. He attended the University of Southern California (USC) and received a B.A. and M.A. in History.⁴⁶ He was an enthusiastic supporter of USC throughout his life. His grandfather, Dr. Walter Lindley, was the first dean of the USC School of Medicine and two of his aunts founded the USC chapter of the Kappa Alpha Theta sorority. Bothwell founded the USC chapter of the Sigma Alpha Epsilon fraternity.⁴⁷ He was also the coach of the USC Yell Leaders (and later the USC Song Girls, founded in 1967) for 60 years. In 1926, he received another degree from the Oregon Agricultural College. In 1927, Bothwell married Marion Seale who was from Palo Alto. In 1930, they were living in Beachwood Canyon with their newborn son, Lindley Jr. and Lindley Sr. was working in the “orange business.”⁴⁸ By 1934, they had moved to the Project Site, which the extended Bothwell family had purchased in 1929.⁴⁹ In 1935, their daughter Bonnie was born. Sometime in the late 1940s they divorced, and Marion and the two children moved to Oakland.⁵⁰ Bothwell remarried Helen Ann Bothwell in 1948.⁵¹

Bothwell was an entrepreneur whose main businesses involved agriculture and automobiles. There are no scholarly sources on Bothwell’s citrus business. The only contemporaneous source regarding Bothwell described him as an “agricultural adviser to film stars in the San Fernando Valley.”⁵² Bruce Bothwell, the grandson of Lindley Bothwell, recalled that his grandfather

⁴⁶ U.S. School Year Books, 1919-1924.

⁴⁷ “USC’s ‘Mr. B,’ Yell, Song Girl Coach, Dies,” *Los Angeles Times*, June 21, 1986.

⁴⁸ 1930 U.S. Census.

⁴⁹ Voter Registration.

⁵⁰ 1949 Oakland City Directory and 1950 U.S. Census.

⁵¹ “James Ricci, San Fernando Valley Widow’s Orange Grove May Be Last of Its Kind,” *Los Angeles Times*, September 2, 1998.

⁵² *San Francisco Examiner*, February 16, 1939.

managed other citrus groves in the San Fernando Valley. He also remembered that oranges were not packed on the property, rather his grandfather was a member of the Sunkist Cooperative. The oranges from the property were picked and transported to a Sunkist plant in either Fillmore or Claremont where they were sorted, packed, and shipped. While Bothwell had a couple of employees to maintain the grove, the packinghouse supplied the labor for picking the fruit.⁵³ The rising cost of labor and water made small groves less profitable, so Bothwell began a mail-order fruit business. While some of the citrus for the gift baskets was grown on the property, other fruits and nuts were purchased from produce markets in Downtown.⁵⁴

His interest in history was apparently reflected in his passion for antique cars. He purchased a vintage Model T Ford when he was still a student at USC.⁵⁵ While there is little information on his citrus business, his involvement with antique cars was widely reported in local newspapers. He was a founding member of the Sports Car Club of America (SCCA) and the president of the Western Region of the SCCA. In addition to collecting antique cars, Bothwell also raced them. In 1949, he broke a 30-year standing speed record at Indianapolis in his 1913 Peugeot.⁵⁶ A fire that year depleted his collection but did not destroy it entirely. The loss included the only two-cylinder Packard in existence.⁵⁷ The collection continued to grow and included fire engines, streetcars, and trains. A 1964 article in the *Los Angeles Times* stated that his collection was the second largest in the nation.⁵⁸ Features of the collection were a 1911 Rolls Royce custom-built for the Nicolas II, the last czar of Russia and a 1905 Mercedes owned by Alfred Vanderbilt. This hobby grew into a business of leasing antique cars for film and television productions, although Bothwell made the collection available for charity fundraisers and school groups. Bothwell died on June 19, 1986, at the age of 84.⁵⁹

5. EVALUATION OF ELIGIBILITY

As previously stated, the Project Site was identified by SurveyLA in 2012 as appearing eligible for federal, state, and local landmark designation “as one of the last remaining family-owned commercial citrus groves in the San Fernando Valley.” Standard preservation practice evaluates collections of buildings, structures, and sites from similar time periods and historic contexts as districts. This is especially the traditional approach for the evaluation of farms and ranches that are often developed where buildings, structures, and sites are functionally related. As the SurveyLA evaluation was conducted from the public right-of-way, however, not all of the buildings were visible to the surveyors. Thus, the individual buildings were not described,

⁵³ James Ricci, “San Fernando Valley Widow’s Orange Grove May Be Last of Its Kind,” *Los Angeles Times*, September 2, 1998.

⁵⁴ Teresa Grimes interview with Bruce Bothwell on April 20, 2022.

⁵⁵ “Get the Dusters, Mother, It’s the Horseless Cart,” *The Citizens News*, October 7, 1961. Another source stated his first car was a 1901 Oldsmobile.

⁵⁶ Jeffrey Hansen, “Pioneer Surfer and Auto Racer Has Hobbies to Stay Young,” *Los Angeles Times*, November 26, 1972.

⁵⁷ “Fire Destroys Antique Autos Used in Films,” *Los Angeles Times*, February 5, 1949.

⁵⁸ William Estes, “Older Cars Kept ‘Sharp’ by Collectors,” *Los Angeles Times*, October 18, 1964.

⁵⁹ Edward J. Boyer, “Lindley Bothwell, USC’s Mr. B. Yell, Song Girl Coach Dies,” *Los Angeles Times*, June 21, 1986.

researched, or identified as contributing or noncontributing. Thus, the Project Site is re-evaluated below on an intensive level based upon additional investigation and research conducted for this report.

5.1 NATIONAL REGISTER OF HISTORIC PLACES

Criterion A

To be eligible for listing in the National Register under Criterion A, a property must have a direct association with events that have made a significant contribution to the broad patterns of our history. The context considered in the evaluation of eligibility under Criterion A was the history of agriculture, specifically the Cash Crops for Export sub-theme from the *LACHCS*.

The period of significance for the Cash Crops for Export sub-theme is 1870 to 1945, which coincides with the era of significant agricultural production in Los Angeles. The eligibility standards state that a grove should be “planted within the period of significance.” As previously stated, the grove on the Project Site was completely replaced between 1980 and 1985. Thus, it was not planted during the period of significance. The integrity considerations state that “original trees may have been replaced over time as their productivity decreased, as long as the historical configuration of trees is intact, and the majority of existing trees are mature.” Thus, a grove could still be considered significant if some of the trees have been replaced. The 2012 SurveyLA evaluation of the Project Site did not acknowledge the replacement of any, let alone, all of the trees. Therefore, it appears to have been based upon the presumption that the grove dated to the 1920s, not the 1980s.

SurveyLA also identified the orange grove at the southeast corner of the California State University, Northridge (CSUN) campus. The 5-acre grove has 400 Valencia orange trees. While the university was established in 1958, the grove dates to the early 1940s. It is unknown if the grove was ever used as a commercial growing operation since its existence prior to the university was very short lived. According to CSUN, more than 100 trees have been replaced and replanted since 2008. The SurveyLA evaluation recognized that “some of the grove’s original trees have been removed and replaced in-kind.” Therefore, the eligibility standards and integrity considerations expect a grove to be planted between 1870 and 1945 and allow for selective but not comprehensive tree replacement.

The Orcutt Ranch Horticulture Center in Canoga Park is another example of a property in the City of Los Angeles with a citrus grove. Orcutt Ranch is designated HCM No. 31, was determined eligible for listing in the National Register through the Section 106 review process and is listed in the California Register. The property was principally recognized for its association with William Orcutt, although it appears to meet the eligibility standards for the Cash Crops for Export sub-theme. Orcutt was one of California’s early oil pioneers who cemented his place in Los Angeles history with the discovery of prehistoric fossils at the La Brea Tar Pits. The 24-acre property was his vacation home. Orcutt planted orange trees on the property in the 1920s and

served as head of the Canoga Park Citrus Association. Six acres of orange trees remain on the property.⁶⁰

There are no groves or orchards of any kind in Los Angeles County listed in the National Register in the context of agriculture; however, 12 examples are listed on the NPS Digital Archive. In most cases, the grove/orchard is associated with an individual or company that played a significant role in the history of agriculture. Agricultural properties listed in the National Register are also significant as early examples of farming and/or settlement in a region. The Berwick Manor and Orchard in Carmel Valley appears to be the only example of the type in California. The property was purchased by Edward Berwick in 1869 and originally consisted of 120 acres. Berwick was a noted agriculturalist who experimented with fruit growing. His farm was a model of its type and the pear he developed there became world renowned. Berwick is credited as the first person to raise winter pears on a commercial scale in the United States. The property is now 29-acres and is the only intact farmstead remaining from the period.⁶¹

The Project Site does not meet the eligibility standards for the Cash Crops for Export sub-theme and is not comparable to other properties listed in the National Register in the context of agriculture. The Project Site is not associated with a prominent company, is not associated with any scientific advancements in citriculture, and is not an early or important example of its type. The grove was originally planted in the early 1920s and was merely part of a trend that was already well established. The grove was entirely replaced between 1980 and 1985 and has not been managed or operated for commercial purposes since 2016. For all the reasons outlined above, neither the Project Site as a whole nor any of the individual buildings, structures, or sites (such as the grove) are significant under Criterion A.

Criterion B

To be eligible for listing under Criterion B, a property must be associated with the lives of persons significant in our past. Several steps are involved in determining whether a property is significant under Criterion B. First, the person must be significant within a historic context. Second, the property must be associated with the person's productive life. Finally, the property must be compared with other associated properties to identify the best representation of the person's historic contributions.⁶²

From 1929 to 1986, the Project Site was owned and occupied by Lindley F. Bothwell and his family. No evidence was found indicating that he was significant within a historic context. While he appears to have been a successful businessman who was active in the community, research did not reveal any important contributions to the history of agriculture. Bothwell was one of

⁶⁰ The City of Los Angeles designated the property LAHCM No. 31 in 1965 and opened the area to residents four years later.

⁶¹ "Berwick Manor & Orchard," National Register of Historic Places Nomination Form, November 17, 1977.

⁶² *National Register Bulletin #15*, 14-15.

many individuals who moved to the San Fernando Valley and worked in the citrus industry during the early part of the twentieth century. The completion of the Los Angeles-Owens River Aqueduct in 1913 provided a reliable supply of water. In the San Fernando Valley, acreage irrigated through artificial means grew 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.⁶³

When Bothwell purchased the Project Site in 1929, the land was already planted with citrus trees. He was not among the pioneers of the San Fernando Valley or among the largest land holders. At one time the grove was 20 acres but reduced before and after his death to 14 acres.⁶⁴ His own property was relatively small for a commercial grove, and his main business appears to have been managing other groves. The claim in newspaper articles that he managed groves throughout the state could not be confirmed.⁶⁵ As groves were replaced with subdivisions, he developed a mail-order fruit business. It appears to have been a profitable but modest enterprise compared with companies like Mission Pak, a popular brand founded by George C. Page in 1917.

Bothwell's automobile collection was undoubtedly his greatest achievement. He purchased his first antique car when he was still in college and began collecting others in the 1930s. Enthusiasts like Bothwell began collecting cars almost as soon as they were invented. Kirk Gibson and George Waterman, for example, had assembled a large enough collection by 1931 to establish a museum called Musée des Vénérables. The collection included 47 vehicles that ranged from an 1896 Waverly to 1913 Fiat.⁶⁶ Bothwell's collection by all accounts was not just large, but included important examples from Austro-Daimler, Buick, Cadillac, Ford, Hudson, National, Packard, and Pope-Hartford, among others. After the death of Helen Ann Bothwell in 2016, the collection was sold.⁶⁷

Even if there was a context developed for this topic and Bothwell was considered a significant figure, the importance would be attached to the collection, not the buildings in which the collection was stored. The storage buildings on the Project Site are utilitarian in design and do not express the collection they once, but no longer contain.

⁶³ Roderick, 71.

⁶⁴ Tract No. 30266 was previously Lot 3 of Tract No. 10515. It was sold and subdivided in 1965 by John Lawton and Mary Bothwell Lawton and Jordan Johnson and Elizabeth Bothwell Johnson. Mary was Lindley's younger sister. Helen Ann Bothwell sold 3.94 acres on the northeast in 1988.

⁶⁵ "He had his own soil and bacteriological laboratory, providing pruning, spraying, and other technical assistance to some 40 ranches from San Francisco to the Mexican border." Jack Birkinshaw, "Agriculture, Once King, All but Finished in Valley," *Los Angeles Times*, November 28, 1978. Other articles claimed he owned or managed 34 ranches. Still other articles stated he was one of the ten largest citrus growers in the United States by 1943 and also raised cattle on a grand scale.

⁶⁶ Rick Carey, "The Founding Fathers of Car Collecting: Waterman & Gibson," *Haggerty*, May 13, 2022.

⁶⁷ Kurt Ernst, "Bonhams to offer 50 cars from the Bothwell Collection in November sale," *Hemmings*, October 16, 2017.

The Project Site is not closely associated with any other individuals, significant or otherwise. Therefore, neither the Project Site as a whole nor any of the individual buildings, structures, or sites are significant under Criterion B.

Criterion C

To be eligible for listing under Criterion C, a property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction.

Type, Period, or Method of Construction

A type, period, or method of construction refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. This aspect of Criterion C encompasses all architectural styles and construction practices. A building or structure is eligible as an architectural type specimen if it is an important example of construction practices from a particular period in history.⁶⁸

Research did not yield any results indicating that the house on the Project Site was considered an important work during its time or in subsequent decades. The house possesses some of the characteristics of Traditional Ranch style, but not enough to make it a true representation of the style. It is lacking in the rustic appearance exhibited in finer examples of the style, which often have wood shake roofs and rambling plans. It is also lacking in elements from vernacular nineteenth century buildings like dovecotes, Dutch doors, and shutters. Although the house has French doors, a front porch, and a rear patio, it is rather disconnected from the outdoors. Additionally, the house did not involve any novel or noteworthy construction techniques, so it does not appear to be significant for embodying the distinctive characteristics of a method of construction. It is an ordinary example of a wood-framed structure with a concrete slab foundation. Finally, the ancillary buildings and structures have been altered since their initial construction and are utilitarian in design. They do not exhibit quality of design or uniqueness in construction that would make them good examples of a type, period, or method of construction. Therefore, neither the Project Site as a whole nor any of the individual buildings or structures are significant under this aspect of Criterion C.

Work of a Master

A master is a figure of generally recognized greatness in a field of design or construction such as architecture, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The property must express a particular phase in the development of the master's career, an aspect of his or her work, or a

⁶⁸ *National Register Bulletin #15*, 17-18.

particular idea or theme in his or her craft. A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect.⁶⁹

The architect of the house on the Project Site is unknown as the construction of the building was not published and the original permit for the building was not found. As it is a typical example of the type, period, and method of construction there is no reason to believe it is the work of a master. The same is the case for the ancillary buildings and structures. Therefore, neither the Project Site as a whole nor any of the individual buildings or structures are significant under this aspect of Criterion C.

High Artistic Values

The possession of high artistic values refers to a property's articulation of a particular concept of design so fully that it expresses an aesthetic ideal.⁷⁰ A property does not possess high artistic values, however, if it does not express aesthetic ideals or design concepts more fully than other properties of its type.⁷¹

A property eligible under this aspect of Criterion C would need to possess ornamentation and detail to lend it high artistic value, which the house on the Project Site does not. Rather, it exhibits the basic features of Traditional Ranch style and does not include the craftsmanship or detailed handwork found in finer examples of the style such as brick, stone, and wood features like chimneys, shingles, shutters, Dutch doors, carved rafter tails, and carved bargeboards. The same is the case for the ancillary buildings and structures. Therefore, neither the Project Site as a whole nor any of the individual buildings or structures are significant under this aspect of Criterion C.

Distinguishable Entity

The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. A district is a property that possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. A district must be significant under Criterion A, Criterion B, or other aspects of Criterion C, or Criterion D as well as being an identifiable entity.⁷²

The area in which the Project Site is located was not identified as a potential district by SurveyLA. During the field inspection conducted for this report, it was determined that there were not enough properties with shared physical characteristics or historical associations in the area to form a potential district. Therefore, the Project Site is being evaluated individually.

⁶⁹ Ibid., 20.

⁷⁰ *National Register Bulletin #15*, 20.

⁷¹ Ibid.

⁷² Ibid., 5.

While the Project Site could be classified as a district because it is an identifiable entity with a variety of resources, as discussed above and below, it is not significant under any criteria. Districts usually reflect one principal activity such as farming or ranching. One of the character defining features of the grove/orchard property type is that they are “typically associated with a least one additional agricultural building or landscape feature.” But in this case, many of the buildings on the Project Site were constructed as storage for Bothwell’s car collection and not for agricultural purposes. Therefore, based upon additional investigation and further research, the Project Site is not significant under this aspect of Criterion C.

Conclusion

For all the reasons outlined above, the Project Site does not appear to be significant under Criterion C.

Criterion D

A property may be eligible under Criterion D if it has yielded, or may be likely to yield, information important in prehistory or history. This criterion generally applies to archaeological sites but may apply to buildings, structures, and objects in instances where the property may contain important information about such topics as construction techniques or human activity. In any case, the property must be the principal source of information. This is unlikely to be true for the Project Site because it did not involve the use of any novel or noteworthy construction techniques. Furthermore, research did not indicate the Project Site to have the potential to yield information about human activity. Therefore, the Project Site does not appear to be significant under Criterion D.

Integrity

To be eligible for listing in the National Register, properties must retain their physical integrity from the period of significance. In the case of architecturally significant properties, the period of significance is normally the date of construction. For historically significant properties, the period of significance is usually measured by the length of the associations. As neither the Project Site nor any of the individual buildings, structures, or sites are significant under any of the National Register criteria, it has no period of significance, and an assessment of its integrity is not required.

Conclusion

The field inspection and research conducted for this report indicate that the Project Site as a whole as well as the individual buildings structures, and sites lack historical significance and architectural distinction. Therefore, it does not appear to be eligible for listing in the National Register under any criteria.

5.2 CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register was modeled on the National Register. The criteria for eligibility for listing in the California Register are virtually the same as the National Register. Therefore, the Project Site appears to be ineligible for listing in the California Register for the same reasons noted above.

5.3 LOS ANGELES HISTORIC-CULTURAL MONUMENTS

On June 29, 2022, the Los Angeles City Council denied a HCM nomination for the Project Site. The City Council determined that the Project Site did not meet the criteria for significance in the Los Angeles Cultural Heritage Ordinance, which are essentially the same as criteria A/1, B/2, and C/3 for listing in the National and California Registers. Therefore, the Project Site is ineligible for HCM designation for the same reasons outlined above.

6. CONCLUSIONS

The Project Site at 5300 Oakdale Avenue is not currently designated under national, state, or local landmark or historic district programs. The Project Site was identified in the 2012 historic resource survey of the Encino – Tarzana CPA as appearing eligible for listing in federal, state, and local registers of historical resources. After careful inspection, investigation, and evaluation, TGHP concludes that none of the buildings, structures, or sites on the Project Site appear to be individually or collectively eligible for listing in the National and California Registers due to a lack of significance. The Los Angeles City Council determined the Project Site does not qualify for designation as a HCM. The recommended Status Code is 6Z, ineligible for designation under federal, state, and local landmark programs through survey evaluation. Thus, the Project Site is not a historical resource as defined by CEQA.

7. REFERENCES

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Appendix A – Résumé

TERESA GRIMES | Historic Preservation

Teresa.Grimes@icloud.com
323-868-2391

Teresa Grimes has 30 years of experience in the field of historic preservation. She is widely recognized as an expert in the identification and evaluation of historical resources having successfully prepared dozens of landmark and historic district applications for a wide variety of property types. Teresa graduated from the University of California with a Master of Art degree in Architecture and has worked in the private, public, and non-profit sectors. Teresa has extensive experience in the preparation of environmental compliance documents in accordance with the California Environmental Quality Act including the identification of historical resources, analysis of direct, indirect, and cumulative impacts, and development of mitigation measures. Her many projects throughout Southern California include the Art Center College of Design Master Plan, Baldwin Hills Crenshaw Plaza, Cinerama Dome Entertainment Center, City of Hope Master Plan, Claremont Graduate University Master Plan, Claremont McKenna College Master Plan, John Anson Ford Theatres, Oakwood School Master Plan, Los Angeles County Museum of Art, Times Mirror Square, Sunset Las Palms Studios, and Sunset Bronson Studios.

Educational Background

- M.A., Architecture, University of California, Los Angeles, 1992
- B.A., Political Science, University of California, Los Angeles, 1986

Qualifications

- Meets the Secretary of the Interior’s Professional Qualifications Standards for history and architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.

Professional Activities

- Pasadena Heritage Board Member, 2008-2012
- Highland Park Heritage Trust, Board Member, 1996-1998
- West Hollywood Cultural Heritage Advisory Board, 1990-1994

Professional Experience

- Teresa Grimes | Historic Preservation, Principal, 2020 - Present
- GPA Consulting, Principal Architectural Historian, 2009-2020
- Christopher A. Joseph & Associates, Senior Architectural Historian, 2006-2009
- Teresa Grimes | Historic Preservation, Principal, 1999-2005, 1993-1994, 1991-1992
- Historic Resources Group, Architectural Historian, 1994-1998
- Getty Conservation Institute, Research Associate, 1992-1993
- Los Angeles Conservancy, Preservation Officer, 1988-1991

Appendix B – Figures

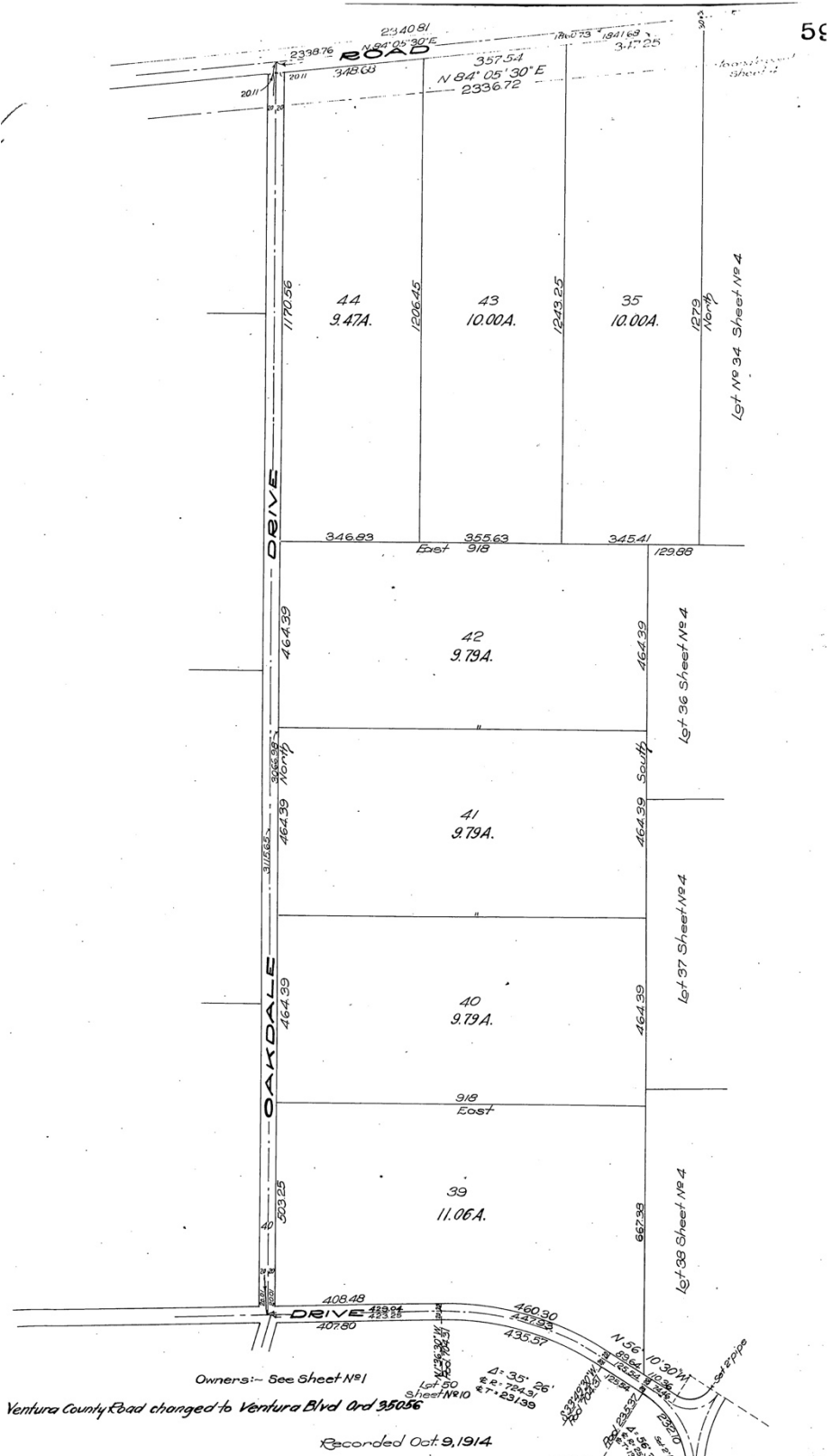


Figure 4: Lots purchased by H.R. Bristol Sr. within Tract No. 2605.



Figure 5: 1928 aerial photograph, UCSB Geospatial Collection, approximate boundary of Project Site outlined in red. Note citrus trees are planted, but no buildings or structures are present.

TRACT N^o 10515

154442

IN THE CITY OF LOS ANGELES

Being a Subdivision of
 Lots 39, 40, 41, 42, 43, 44 & 35 of Tract N^o 2605 as per map recorded in Book
 27 p. 35 et seq. Records of Los Angeles County, and that portion of Oakdale
 Drive as vacated by Ordinance N^o 64344 of the City of Los Angeles.

Reburn & Bowen
 Engineers
 1929

I, J. G. Morgan hereby certify that I am a Civil Engineer and
 that this map consisting of 1 sheet correctly represents a survey made under my
 supervision in November 1928 and that all of the monuments shown hereon
 actually exist and their positions are correctly shown.

Subscribed and sworn to before me this 1st day of April 1929.

The bearing of Oakdale Drive as shown on map of Tract N^o 8812, recorded in
 Map Book 180 p. 31-36, was taken as the basis of bearings shown upon this map.

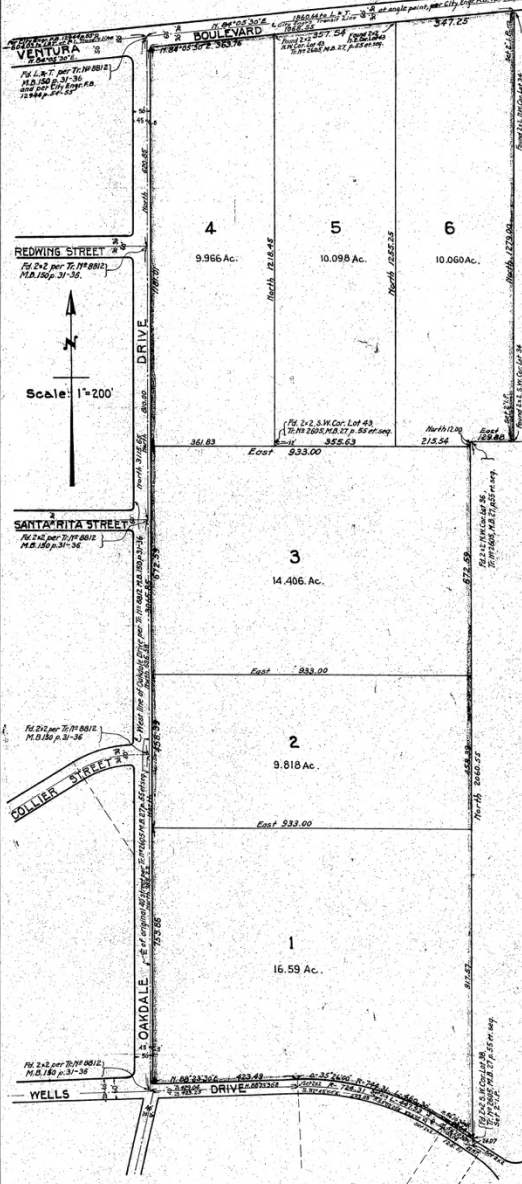
We hereby certify that we are the owners of or interested in the land
 included within the subdivision shown on the annexed map and that we are the only
 persons whose consent is necessary to pass a clear title to said land and we consent
 to the making of said map and subdivision as shown within the colored border line.

Paul J. Howard
Lindley F. Bottwell
Samuel F. Bottwell
Nels Nelson
Myra L. Bottwell
Anette K. Nelson

STATE OF CALIFORNIA)
 COUNTY OF LOS ANGELES)
 On this 19th day of MARCH in the year 1929 before me
CLARENCE F. SHAW a Notary Public in and for the County of Los Angeles State of
 California residing therein duly commissioned and sworn personally appeared
 Paul J. Howard Lindley F. Bottwell Samuel F. Bottwell Nels Nelson
 Alaseba Howard Marion S. Bottwell Myra L. Bottwell Anette K. Nelson

known to me to be the persons whose names are subscribed to the within instrument and
 acknowledged to me that they executed the same. In Witness whereof I have hereunto set my
 hand and affixed my official seal the day and year in this certificate first above written.

STATE OF CALIFORNIA)
 COUNTY OF LOS ANGELES)
 On this 21st day of MARCH in the year 1929 before me
VICTOR H. HENDRICK a Notary Public in and for said County of Los Angeles State of
 California residing therein duly commissioned and sworn personally appeared
 Lewis C. Spieess, Jr. Henry R. Bristol, Jr. and Lina L. Shaw
 known to me to be the Executors of the estate of Henry R. Bristol, Sr. deceased and acknow-
 ledged to me that pursuant to an order of the Superior Court of the State of California in and for the
 County of Los Angeles in Case N^o 94754, they signed and executed the within instrument on behalf of
 said estate. In Witness whereof, I have hereunto set my hand and affixed my official seal
 the day and year in this certificate first above written.



RECORD
 AUG 9 1929
 10515
 500

10515 Tract No.

John C. Shaw
 Aug. 9, 1929

TRACT NO. 10515
 27th March 9
Agust. Rox. Dominguez
 City
 John C. Shaw
 July 26th 9
 11 June 29
590 Henry

Figure 6: Tract Map No. 10515



Figure 7: 1940 aerial photograph, UCSB Geospatial Collection, approximate boundary of Project Site outlined in red. Note citrus trees are planted, driveway cuts through the middle of the property, the house is on the south side of the driveway, and there are various buildings and structures on the southeast side of the Project Site.



Figure 8: 1944 aerial photograph, UCSB Geospatial Collection, approximate boundary of Project Site outlined in red. Note the Project Site remained unaltered from 1940.



Figure 9: 1947 aerial photograph, NETR Historic Aerials.com, approximate boundary of Project Site outlined in red. Note the construction of storage building for the car collection on east.



Figure 10: 1952 aerial photograph, NETR Historic Aerials.com, approximate boundary of Project Site outlined in red. Note the structure and buildings that once stood on the southeast are gone.



Figure 11: 1960 aerial photograph, UCSB Geospatial Collection, approximate boundary of Project Site outlined in red. Note the garage and tool shed are present, but the citrus trees are beginning to fade.



Figure 12: 1964 NETR Historic Aerials.com, approximate boundary of Project Site outlined in red. Note the construction of the north storage buildings and the citrus trees are continuing to fade.

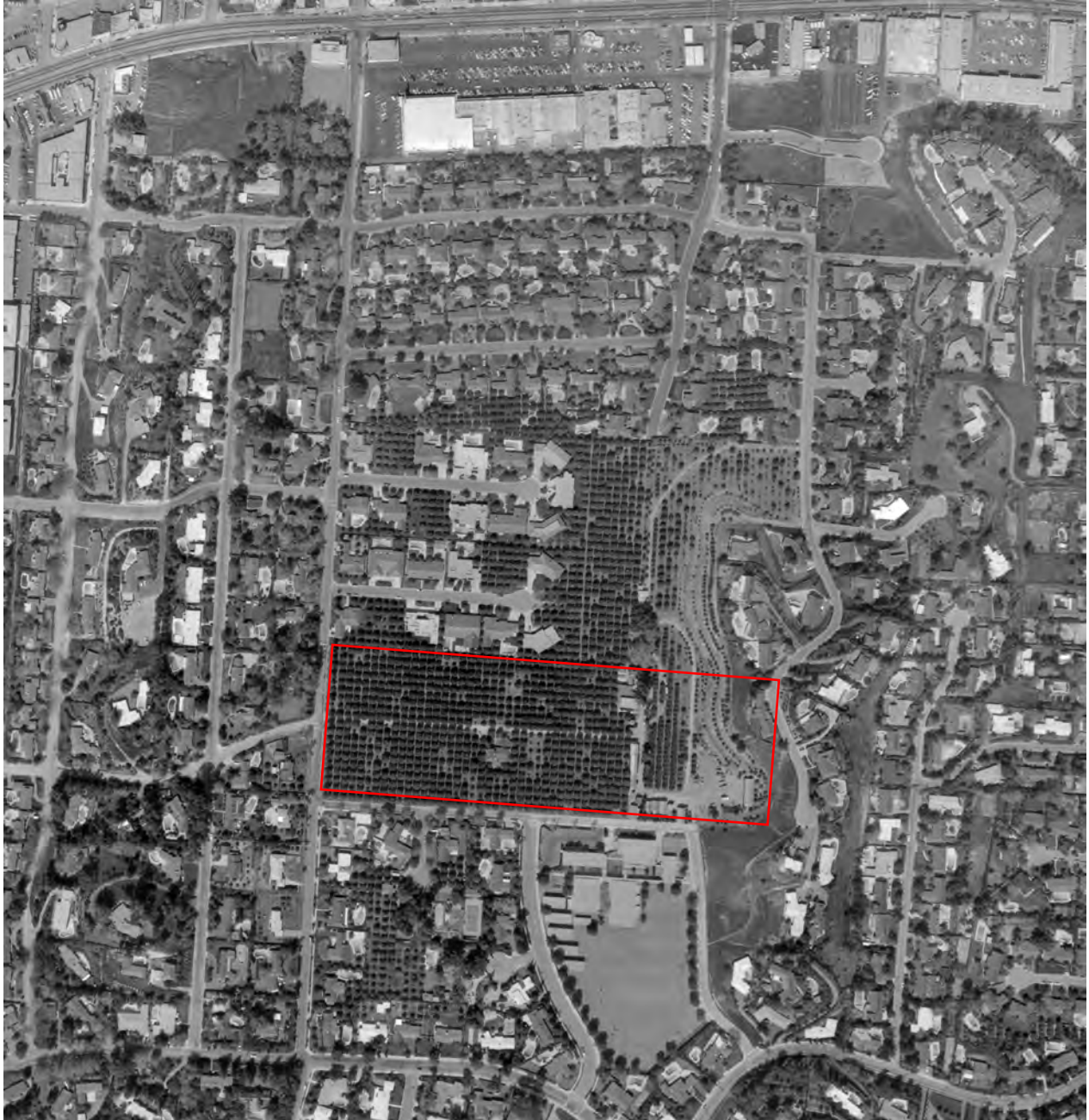


Figure 13: 1971 aerial photograph, UCSB Geospatial Collection, approximate boundary of Project Site outlined in red. Note the property remained unaltered from 1964.



Figure 14: 1978 NETR Historic Aerials.com, approximate boundary of Project Site outlined in red. Note the construction of the train station and shed and the citrus trees are continuing to fade.



Figure 15: 1980 NETR Historic Aerials.com, approximate boundary of Project Site outlined in red. Note the citrus trees are essentially gone.



Figure 16: 1985 NETR Historic Aerials.com, approximate boundary of Project Site outlined in red. Note the citrus trees have been replanted.



Figure 17: July 2022 view of Project Site looking east down driveway.



Figure 18: July 2022 view of house on Project Site looking south toward primary (north) facade.



Figure 19: July 2022 view of multi-purpose building on Project Site looking southwest toward east facade.



Figure 20: July 2022 view of train station on Project Site looking southeast from multi-purpose building.



Figure 21: July 2022 view of train station on Project Site looking southwest from train shed.



Figure 22: July 2022 view of train storage shed on Project Site looking north.



Figure 23: July 2022 view of storage building on Project Site looking northeast toward south facade.



Figure 24: July 2022 view of storage buildings in southeastern portion of Project Site looking west.



Figure 25: July 2022 view of storage building in easternmost portion of Project Site looking northeast.

Appendix C – 2022 DPR Forms

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

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 1 of 17 *Resource Name or #: (Assigned by recorder) 5300 Oakdale Avenue, Los Angeles

P1. Other Identifier: Bothwell Ranch

*P2. Location: Not for Publication Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad _____ Date _____ T _____; R _____; _____ of _____ of Sec _____; _____ B.M.

c. Address 5300 Oakdale Avenue City Los Angeles Zip 91356

d. UTM: (Give more than one for large and/or linear resources) Zone _____, _____ mE/ _____ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

Assessor Parcel Numbers 2164-008-001; 2164-008-005, 2164-008-006, and 2164-008-007.

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

The property is located at 5300 Oakdale Avenue in the Encino - Tarzana Community Plan Area of the City of Los Angeles. It is commonly known as Bothwell Ranch and includes a single-family house, grove, and variety of ancillary buildings. The approximately 14-acre property is located in a RA-1 Zone and is surrounded single-family residential neighborhoods. Directly south of the property on Collier Street is the CHIME Institute's Schwarzenegger Community School.

*P3b. Resource Attributes: (List attributes and codes) HP2, HP33

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

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



P5b. Description of Photo: (view, date, accession #) camera facing northwest, July 2022

*P6. Date Constructed/Age and

Source: Historic Prehistoric
 Both

Circa 1925 to Circa 1985
Historic Aerial Photographs

*P7. Owner and Address:

Helen A. Bothwell Trust

P.O. Box 1546

Alameda, CA 94501

*P8. Recorded by: (Name, affiliation, and address) Teresa Grimes

Historic Preservation
40 Arroyo Drive Unit 101,
Pasadena, CA 91105

*P9. Date Recorded: July 2022

*P10. Survey Type: (Describe)

Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")
5300 Oakdale Avenue, Los Angeles Historical Resource
Technical Report, July 2022

*Attachments: NONE Location Map Continuation Sheet Building, Structure, and Object Record

Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record

Artifact Record Photograph Record Other (List): _____

Page 2 of 17

*NRHP Status Code 6Z

*Resource Name or # (Assigned by recorder) 5300 Oakdale Avenue, Los Angeles

D1. Historic Name: Bothwell Ranch

D2. Common Name: Bothwell Ranch

*D3. **Detailed Description** (Discuss overall coherence of the district, its setting, visual characteristics, and minor features. List all elements of district.): The property is generally divided into western and eastern portions. The western portion is the larger of the two and includes APN 2164-008-001, which is 9.81 acres in size. The land is relatively flat and planted with evenly spaced citrus trees in rows with a north-south orientation. Bisecting the grove is a gravel driveway, which begins on Oakdale Avenue and terminates in a surface parking area on the eastern portion. The eastern portion includes APNs 2164-008-005, 006, and 007, which is 4.18 acres in size. The topography rises from west to east. In addition to the surface parking area, there are a variety of buildings and structures with citrus trees planted sporadically in the eastern portion. (Continued below.)

*D4. **Boundary Description** (Describe limits of district and attach map showing boundary and district elements.): The property is situated on the east side of Oakdale Avenue at the corner of Collier Street. It is approximately 14 acres in size and includes four Assessor Parcel Numbers: APN 2164-008-001 is Lot 2 of Tract No. 10515; APN 2164-008-005 is a portion of Lot 36 of Tract No. 2605; APN 2164-008-006 is a portion of Lot 37 of Tract No. 2605; and APN 2164-008-007 is a portion of Lots 36 and 37 of Tract No. 2605.

*D5. **Boundary Justification:** The boundary encompasses the area owned and operated by the Bothwell family from approximately 1929 to 2016. Property beyond this beyond historically owned by the family was excluded from the boundary because it has been subdivided for single-family houses.

D6. **Significance:** Theme Agriculture and Architecture Area Los Angeles
Period of Significance N/A Applicable Criteria N/A (Discuss district's importance in terms of its historical context as defined by theme, period of significance, and geographic scope. Also address the integrity of the district as a whole.)

The property is evaluated below using the eligibility standards from the Los Angeles Citywide Historic Context Statement. The most relevant contexts and themes for the evaluation of the property are the Agricultural Roots theme within the Industrial Development context and the Ranch House theme within the Architecture and Engineering context. The property is ineligible for listing in the National Register of Historic Places and California Register of Historical Resources and designation as a Los Angeles Historic-Cultural Monument for lack of significance. (Continued below.)

*D7. **References** (Give full citations including the names and addresses of any informants, where possible.):
(Continued below.)

*D8. **Evaluator:** Teresa Grimes **Date:** 8/24/22

Affiliation and Address: Teresa Grimes | Historic Preservation, 40 Arroyo Drive, Pasadena, CA 91105

*Resource Name or # (Assigned by recorder) 5300 Oakdale Avenue, Los Angeles

D1. Historic Name: Bothwell Ranch

D2. Common Name: Bothwell Ranch

D3. Description Continued:

On the south side of the driveway in the approximate center of the grove is a single-family house constructed in circa 1934. The house has a wood-framed structure and U-shaped configuration sheathed in channel rustic wood siding. The open end of the U faces south toward the backyard. The west wing of the U is two stories in height and covered by a hipped roof, the east wing is one-story in height and covered by a rear-facing gabled roof, and the connecting middle wing is one-story in height and covered by a side-facing gabled roof. The roofs have shallow overhanging eaves with exposed rafter tails. The primary (north) façade is organized asymmetrically. The main entrance is located in the middle wing within a projecting front porch. A projecting balcony extends along the second story of the west wing. Windows throughout the house are mostly multi-paned wood casements set in pairs. Similarly designed French doors open on to the balcony as well as the rear patio. Some wood windows have been replaced with vinyl and aluminum sliders. The front yard is separated from the driveway by a low brick garden wall. Brick is also used as a paving material for the walkways, front porch, and rear patio. The yard is fenced on all sides, vinyl picket on the front and chain link on the sides and rear.

At the northeastern corner of the grove is a two-story multi-purpose building constructed between 1952 and 1964. The first floor was used as a workshop and car storage, while the second floor as an office and caretaker's quarters. The building has a wood-framed structure with various components indicating it was constructed in phases. The roofs are mostly side-facing gables with overhanging eaves and exposed rafter tails. The exterior is clad with board-and-batten wood siding. The fenestration is irregular and the patches in the siding and variety of doors and windows suggest changes over time. There is an assortment of window sizes, types, and materials including wood awning and aluminum sliding sash. There are shed roof lean-tos on the north and south. The one on the north is enclosed with corrugated metal siding. South of the multi-purpose building are two water storage tanks.

East of the multi-purpose building is the train station and storage shed constructed around 1978. The station is a wood-framed structure with a T-shaped configuration covered by an intersecting gabled roof. The roof is characterized by overhanging eaves with exposed rafters. Board and batten wood siding clads most of the building, but the pattern changes on the west façade. The east façade appears to be the most intact with a wood paneled door and double-hung wood sash windows. Other windows include aluminum sliding sash. Attached to the west façade is a gabled roof lean-to that appears to have originally been freestanding. The storage shed is a crescent-shaped structure with a wood frame and corrugated metal roof.

At the southeastern corner of the grove is two-story building that was used for car storage. The building has a wood-framed structure, gabled roof, and long rectangular shape with a north-south orientation. The exterior, including the roof, is covered with sheets of corrugated metal; however, board and batten wood siding is visible in the gable face of the north

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*NRHP Status Code 6Z

*Resource Name or # (Assigned by recorder) 5300 Oakdale Avenue, Los Angeles

D1. Historic Name: Bothwell Ranch

D2. Common Name: Bothwell Ranch

façade. There is a car ramp on the south leading to large sliding doors on the second story.

Further southeast is another water storage tank and cluster of corrugated metal sheds.

At the easternmost side of the property is another car storage building two-stories in height. Constructed in circa 1947, the building has a wood-framed structure and long rectangular shape with a north-south orientation. The exterior, including the roof, is covered with sheets of corrugated metal. There are large swing doors along the first story of the west façade and four single-paned windows spaced evenly along the second story. There is a car ramp at the south end leading to large sliding doors on the second story.

D6. Significance Continued:

NATIONAL REGISTER OF HISTORIC PLACES

Criterion A

To be eligible for listing in the National Register under Criterion A, a property must have a direct association with events that have made a significant contribution to the broad patterns of our history. The context considered in the evaluation of eligibility under Criterion A was the history of agriculture, specifically the Cash Crops for Export sub-theme from the LACHCS.

The period of significance for the Cash Crops for Export sub-theme is 1870 to 1945, which coincides with the era of significant agricultural production in Los Angeles. The eligibility standards state that a grove should be "planted within the period of significance." As previously stated, the grove on the property was completely replaced between 1980 and 1985. Thus, it was not planted during the period of significance. The integrity considerations state that "original trees may have been replaced over time as their productivity decreased, as long as the historical configuration of trees is intact, and the majority of existing trees are mature." Thus, a grove could still be considered significant if some of the trees have been replaced. The 2012 SurveyLA evaluation of the property did not acknowledge the replacement of any, let alone, all of the trees. Therefore, it appears to have been based upon the presumption that the grove dated to the 1920s, not the 1980s.

SurveyLA also identified the orange grove at the southeast corner of the California State University, Northridge (CSUN) campus. The 5-acre grove has 400 Valencia orange trees. While the university was established in 1958, the grove dates to the early 1940s. It is unknown if the grove was ever used as a commercial growing operation since its existence prior to the university was very short lived. According to CSUN, more than 100 trees have been replaced and replanted since 2008. The SurveyLA evaluation recognized that "some of the grove's original trees have been removed and replaced in-kind." Therefore, the eligibility standards and integrity considerations expect a

*Resource Name or # (Assigned by recorder) 5300 Oakdale Avenue, Los Angeles

D1. Historic Name: Bothwell Ranch

D2. Common Name: Bothwell Ranch

grove to be planted between 1870 and 1945 and allow for selective but not comprehensive tree replacement.

The Orcutt Ranch Horticulture Center in Canoga Park is another example of a property in the City of Los Angeles with a citrus grove. Orcutt Ranch is designated HCM No. 31, was determined eligible for listing in the National Register through the Section 106 review process and is listed in the California Register. The property was principally recognized for its association with William Orcutt, although it appears to meet the eligibility standards for the Cash Crops for Export sub-theme. Orcutt was one of California's early oil pioneers who cemented his place in Los Angeles history with the discovery of prehistoric fossils at the La Brea Tar Pits. The 24-acre property was his vacation home. Orcutt planted orange trees on the property in the 1920s and served as head of the Canoga Park Citrus Association. Six acres of orange trees remain on the property.¹

There are no groves or orchards of any kind in Los Angeles County listed in the National Register in the context of agriculture; however, 12 examples are listed on the NPS Digital Archive. In most cases, the grove/orchard is associated with an individual or company that played a significant role in the history of agriculture. Agricultural properties listed in the National Register are also significant as early examples of farming and/or settlement in a region. The Berwick Manor and Orchard in Carmel Valley appears to be the only example of the type in California. The property was purchased by Edward Berwick in 1869 and originally consisted of 120 acres. Berwick was a noted agriculturalist who experimented with fruit growing. His farm was a model of its type and the pear he developed there became world renowned. Berwick is credited as the first person to raise winter pears on a commercial scale in the United States. The property is now 29-acres and is the only intact farmstead remaining from the period.²

The property does not meet the eligibility standards for the Cash Crops for Export sub-theme and is not comparable to other properties listed in the National Register in the context of agriculture. The property is not associated with a prominent company, is not associated with any scientific advancements in citriculture, and is not an early or important example of its type. The grove was originally planted in the early 1920s and was merely part of a trend that was already well established. The grove was entirely replaced between 1980 and 1985 and has not been managed or operated for commercial purposes since 2016. For all the reasons outlined above, the property does not appear to be significant under Criterion A.

¹ The City of Los Angeles designated the property LAHCM No. 31 in 1965 and opened the area to residents four years later.

² "Berwick Manor & Orchard," National Register of Historic Places Nomination Form, November 17, 1977.

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*NRHP Status Code 6Z

*Resource Name or # (Assigned by recorder) 5300 Oakdale Avenue, Los Angeles

D1. Historic Name: Bothwell Ranch

D2. Common Name: Bothwell Ranch

Criterion B

To be eligible for listing under Criterion B, a property must be associated with the lives of persons significant in our past. Several steps are involved in determining whether a property is significant under Criterion B. First, the person must be significant within a historic context. Second, the property must be associated with the person's productive life. Finally, the property must be compared with other associated properties to identify the best representation of the person's historic contributions.³

From 1929 to 1986, the property was owned and occupied by Lindley F. Bothwell and his family. No evidence was found indicating that he was significant within a historic context. While he appears to have been a successful businessman who was active in the community, research did not reveal any important contributions to the history of agriculture. Bothwell was one of many individuals who moved to the San Fernando Valley and worked in the citrus industry during the early part of the twentieth century. The completion of the Los Angeles-Owens River Aqueduct in 1913 provided a reliable supply of water. In the San Fernando Valley, acreage irrigated through artificial means grew 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.⁴

When Bothwell purchased the property in 1929, the land was already planted with citrus trees. He was not among the pioneers of the San Fernando Valley or among the largest land holders. At one time the grove was 20 acres but reduced before and after his death to 14 acres.⁵ His own property was relatively small for a commercial grove, and his main business appears to have been managing other groves. The claim in newspaper articles that he managed groves throughout the state could not be confirmed.⁶ As groves were replaced with subdivisions, he developed a mail-order fruit business. It appears to have been a profitable but modest enterprise compared with companies like Mission Pak, a popular brand founded by George C. Page in

³ Patrick Andrus and Rebecca Shrimpton, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: U.S. Department of the Interior, 1997), 14-15.

⁴ Kevin Roderick, *The San Fernando Valley: America's Suburb* (Los Angeles: Los Angeles Times Books, 2002), 71.

⁵ Tract No. 30266 was previously Lot 3 of Tract No. 10515. It was sold and subdivided in 1965 by John Lawton and Mary Bothwell Lawton and Jordan Johnson and Elizabeth Bothwell Johnson. Mary was Lindley's younger sister. Helen Ann Bothwell sold 3.94 acres on the northeast in 1988.

⁶ "He had his own soil and bacteriological laboratory, providing pruning, spraying, and other technical assistance to some 40 ranches from San Francisco to the Mexican border." Jack Birkinshaw, "Agriculture, Once King, All but Finished in Valley," *Los Angeles Times*, November 28, 1978. Other articles claimed he owned or managed 34 ranches. Still other articles stated he was one of the ten largest citrus growers in the United States by 1943 and also raised cattle on a grand scale.

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1917.

Bothwell's automobile collection was undoubtedly his greatest achievement. He purchased his first antique car when he was still in college and began collecting others in the 1930s. Enthusiasts like Bothwell began collecting cars almost as soon as they were invented. Kirk Gibson and George Waterman, for example, had assembled a large enough collection by 1931 to establish a museum called Musée des Vénérables. The collection included 47 vehicles that ranged from an 1896 Waverly to 1913 Fiat.⁷ Bothwell's collection by all accounts was not just large, but included important examples from Austro-Daimler, Buick, Cadillac, Ford, Hudson, National, Packard, and Pope-Hartford, among others. After the death of Helen Ann Bothwell in 2016, the collection was sold.⁸

Even if there was a context developed for this topic and Bothwell was considered a significant figure, the importance would be attached to the collection, not the buildings in which the collection was stored. The storage buildings on the property are utilitarian in design and do not express the collection they once, but no longer contain.

The property is not closely associated with any other individuals, significant or otherwise. Therefore, the property does not appear to be significant under Criterion B.

Criterion C

To be eligible for listing under Criterion C, a property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction.

Type, Period, or Method of Construction

A type, period, or method of construction refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. This aspect of Criterion C encompasses all architectural styles and construction practices. A building or structure is eligible as an architectural type specimen if it is an important example of construction practices from a particular period in history.⁹

Research did not yield any results indicating that the house on the property was considered an important work during its time or in subsequent decades. The house possesses some of the characteristics of Traditional Ranch style,

⁷ Rick Carey, "The Founding Fathers of Car Collecting: Waterman & Gibson," *Haggerty*, May 13, 2022.

⁸ Kurt Ernst, "Bonhams to offer 50 cars from the Bothwell Collection in November sale," *Hemmings*, October 16, 2017.

⁹ *National Register Bulletin #15*, 17-18.

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but not enough to make it a true representation of the style. It is lacking in the rustic appearance exhibited in finer examples of the style, which often have wood shake roofs and rambling plans. It is also lacking in elements from vernacular nineteenth century buildings like dovecotes, Dutch doors, and shutters. Although the house has French doors, a front porch, and a rear patio, it is rather disconnected from the outdoors. Additionally, the house did not involve any novel or noteworthy construction techniques, so it does not appear to be significant for embodying the distinctive characteristics of a method of construction. It is an ordinary example of a wood-framed structure with a concrete slab foundation.

Work of a Master

A master is a figure of generally recognized greatness in a field of design or construction such as architecture, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The property must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft. A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect.¹⁰

The architect of the house on the property is unknown as the construction of the building was not published and the original permit for the building was not found. As it is a typical example of the type, period, and method of construction there is no reason to believe it is the work of a master.

High Artistic Values

The possession of high artistic values refers to a property's articulation of a particular concept of design so fully that it expresses an aesthetic ideal.¹¹ A property does not possess high artistic values, however, if it does not express aesthetic ideals or design concepts more fully than other properties of its type.¹²

A property eligible under this aspect of Criterion C would need to possess ornamentation and detail to lend it high artistic value, which the house on the property does not. Rather, it exhibits the basic features of Traditional Ranch style and does not include the craftsmanship or detailed handwork found in finer examples of the style such as brick, stone, and wood features like chimneys, shingles, shutters, Dutch doors, carved rafter tails, and carved bargeboards.

Distinguishable Entity

The last aspect of Criterion C, representing a significant and

¹⁰ Ibid., 20.

¹¹ *National Register Bulletin #15*, 20.

¹² Ibid.

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distinguishable entity whose components lack individual distinction, refers to historic districts. A district must be significant, as well as being an identifiable entity.¹³

The area in which the property is located was not identified as a potential district by SurveyLA. During the field inspection conducted for this report, it was determined that there were not enough properties with shared physical characteristics or historical associations in the area to form a potential district. Therefore, the property is being evaluated individually.

While the property could be classified as a district because it is an identifiable entity with a variety of resources, as discussed above and below, it is not significant under Criterion A, B, other aspects of C, or D. Additionally, districts usually reflect on principal activity such as a ranch. But in this case, many of the buildings on the property were constructed as storage for Bothwell's car collection.

Conclusion

For all the reasons outlined above, the property does not appear to be significant under Criterion C.

Criterion D

A property may be eligible under Criterion D if it has yielded, or may be likely to yield, information important in prehistory or history. This criterion generally applies to archaeological sites but may apply to buildings, structures, and objects in instances where the property may contain important information about such topics as construction techniques or human activity. In any case, the property must be the principal source of information. This is unlikely to be true for the property because it did not involve the use of any novel or noteworthy construction techniques. Furthermore, research did not indicate the property to have the potential to yield information about human activity. Therefore, the property does not appear to be significant under Criterion D.

Integrity

To be eligible for listing in the National Register, properties must retain their physical integrity from the period of significance. In the case of architecturally significant properties, the period of significance is normally the date of construction. For historically significant properties, the period of significance is usually measured by the length of the associations. As the property is not significant under any of the National Register criteria, it has no period of significance, and an assessment of its integrity is not required.

¹³ Ibid., 5.

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Conclusion

The field inspection and research conducted for this report indicate that the property lacks historical significance and architectural distinction. Therefore, it does not appear to be eligible for listing in the National Register under any criteria.

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register was modeled on the National Register. The criteria for eligibility for listing in the California Register are virtually the same as the National Register. Therefore, the property appears to be ineligible for listing in the California Register for the same reasons noted above.

LOS ANGELES HISTORIC-CULTURAL MONUMENTS

On June 29, 2022, the Los Angeles City Council denied a HCM nomination for the property. The City Council determined that the Project Site did not meet the criteria for significance in the Los Angeles Cultural Heritage Ordinance, which are essentially the same as criteria A/1, B/2, and C/3 for listing in the National and California Registers. Therefore, the property is ineligible for HCM designation for the same reasons outlined above.

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Figure 1: July 2022 view of property looking east down driveway.



Figure 2: July 2022 view of house looking south toward primary (north) façade.

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Figure 3: July 2022 view of multi-purpose building looking southeast toward east façade.



Figure 4: July 2022 view of train station looking southeast from multi-purpose building.

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Figure 5: July 2022 view of train station looking southwest from train shed.



Figure 6: July 2022 view of train shed looking north.

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Figure 7: July 2022 view of storage building looking northeast toward south façade.



Figure 8: July 2022 view of storage buildings in southwestern portion of property looking west.

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Figure 9: July 2022 view of storage building in easternmost portion of property looking northeast.

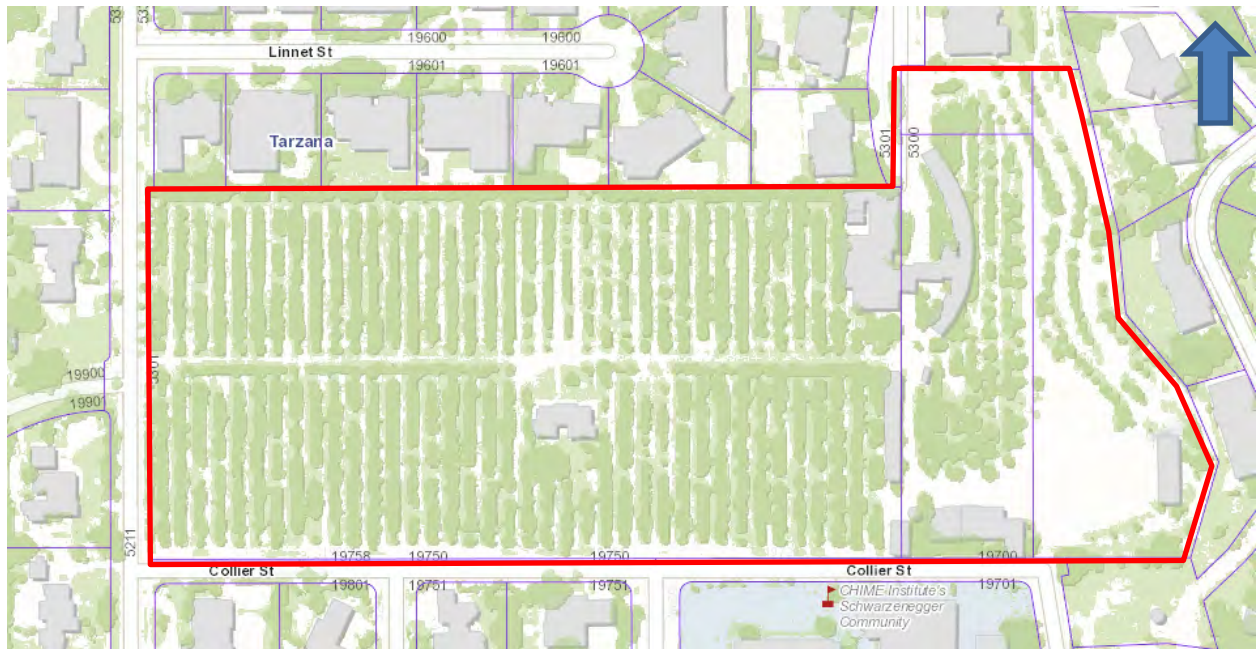


Exhibit B

MEMORANDUM

Date: May 12, 2022
For: Erik Pfahler
Bornstein Enterprises
Project: 5300 Oakdale Avenue, Los Angeles
Subject: HCM Nomination Peer Review

INTRODUCTION

This memorandum presents the results of a peer review of the Historic-Cultural Monument (HCM) nomination for the property at 5300 Oakdale Avenue in the Encino – Tarzana Community Plan Area of the City of Los Angeles. The property is approximately 14 acres in size and includes four Assessor Parcel Numbers summarized below:

- APN 2164-008-001 is Lot 2 of Tract No. 10515 (9.81 acres)
- APN 2164-008-005 is a portion of Lot 36 of Tract No. 2605 (0.30 acres)
- APN 2164-008-006 is a portion of Lot 37 of Tract No. 2605 (1.96 acres)
- APN 2164-008-007 is a portion of Lots 36 and 37 of Tract No. 2605 (1.92 acres)

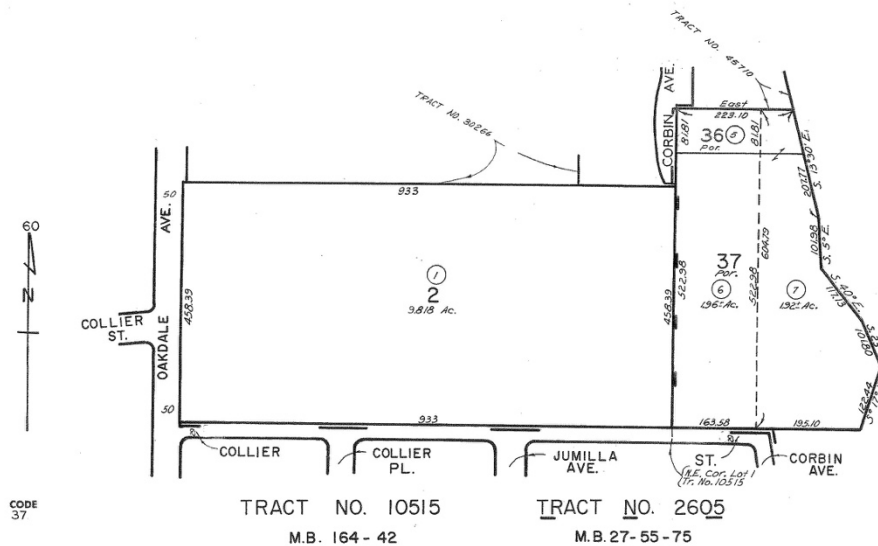


Figure 1: Assessor Parcel Map

APN 2164-008-001 is occupied by a single-family house and an orchard; APN 2164-008-007 is occupied by a storage building; and APN 2164-008-006 is occupied by a variety of ancillary buildings. The property is commonly known as the Bothwell Ranch, so named for Lindley Fowler Bothwell (1901-1986), the patriarch of the family who owns the property to this day.

Grimes Peer Review Memorandum

In 2012, the property was identified by SurveyLA as appearing eligible for national, state, and local landmark designation “as one of the last remaining family-owned commercial citrus groves in the San Fernando Valley.” In 2019, an HCM nomination was initiated by Council District 3. The Office of Historic Resources (OHR) prepared the nomination for the property, which was reviewed and recommended for designation by the Cultural Heritage Commission on November 7, 2019. The City Council has not yet acted on the pending nomination.

Pursuant to your request, I have reviewed the nomination for methodology, accuracy, and completeness according to best practices in the field of historic preservation. In preparing this memorandum I inspected the property, conducted research, and applied the applicable eligibility standards from the *Los Angeles Citywide Historic Context Statement (LACHCS)*.

SURVEYLA

In 2012, the property was identified and evaluated by SurveyLA in the Agricultural Roots Theme of the Industrial Development Context of the *LACHCS*. The eligibility standards for the grove/orchard property type are found in Table 1 below.

TABLE 1: GROVE/ORCHARD	
Context: Industrial Development, 1850-1980	
Theme: Agricultural Roots, 1850-1965	
Subtheme: Cash Crops for Export, 1870-1945	
Property Type, Grove/Orchard	
Eligibility Standards	
<ul style="list-style-type: none">• Planted within the period of significance	
<ul style="list-style-type: none">• Retains ability to convey historic association from the period of significance	
<ul style="list-style-type: none">• Retains most of the essential physical features from the period of significance	
Character-Defining/Associative Features	
<ul style="list-style-type: none">• Concentration of numerous mature citrus or deciduous trees planted with ordered spacing characteristic of cultivated grove or orchard	
<ul style="list-style-type: none">• Is large enough to convey a historically rural setting	
<ul style="list-style-type: none">• Typically associated with a least one additional agricultural building or landscape feature (may include a farm/ranch house; outbuilding, land, cooperative association office, or packing house)	
Integrity Considerations	
<ul style="list-style-type: none">• Should retain integrity of Location, Setting, Feeling, and Association	
<ul style="list-style-type: none">• Original trees may have been replaced over time as their productivity decreased, as long as the historical configuration of trees is intact, and the majority of existing trees are mature	

The summary statement of significance from SurveyLA is as follows:

As one of the last remaining commercial citrus orchards in the San Fernando Valley, Bothwell Ranch is significant as representing the once vast agriculture of the San Fernando Valley. Other ranches were driven out of the area by rising land value during the housing boom after World War II. Without enough land to farm or raise livestock, farmers were unable to continue making a viable living. The Bothwell Ranch was purchased in 1926 by Lindley Bothwell. At that time, the citrus orchard was about six years old and covered 100 acres. The period of significance for the ranch begins in 1926, the date of its initial purchase by the Bothwell family for commercial ranching purposes. Ann Bothwell continues to operate the ranch to the present day. Lindley Bothwell, who received a degree in agriculture from Oregon State University in 1926, came to own or manage over 30 ranches across southern California. He also started a business that provided technical assistance to other growers, but research did not reveal the name of this company.

SurveyLA records do not include footnotes or a bibliography, so the sources of the information contained in the statement above are unknown. Based upon the eligibility standards, the SurveyLA evaluators apparently presumed the orchard was planted in 1920, which is within the period of significance (1870 to 1945) for the property type. As discussed below, the older orchard was removed after 1980 (see Figure 13) and replaced in its entirety by 1985 (see Figure 14).

LOS ANGELES CULTURAL HERITAGE ORDINANCE

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). The Commission is comprised of five citizens, appointed by the mayor who have exhibited knowledge of Los Angeles history, culture and architecture. A monument is any site, building, or structure of particular historic or cultural significance to the City of Los Angeles and may be designated if it meets at least one of the following criteria:

1. The proposed HCM 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; or
2. The proposed HCM is associated with the lives of historic personages important to national, state, city, or local history; or
3. The proposed HCM 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.¹

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

¹ Los Angeles Administrative Code § 22.171.7.

HCM NOMINATION SUMMARY

The HCM nomination essentially picked up where the SurveyLA evaluation left off. While SurveyLA was conducted from the public right-of-way and involved minimal property-specific research, OHR staff obtained access to the property and performed more research. By the time the nomination was prepared; however, the orchard was no longer operational. The nomination asserts the property is eligible for HCM designation under Criterion 1 of the Ordinance because it exemplifies significant contributions to the broad economic history of the San Fernando Valley. The statement of significance is as follows:

The subject property, originally part of a 100-acre citrus orchard, was purchased by Lindley Bothwell in 1926. At that time, the subject property was about six years old and covered 30 acres. Over time, the property was subdivided and sections to the north of the current boundaries were sold for residential development: in 1965 (Santa Rita and Linnet Streets), 1978 (west side of Corbin Avenue), and 1988 (east side of Corbin Avenue and south side of Wellington Lane). The other portions of the original 100-acre orchard property, still in use for citrus farming in 1947, have been entirely replaced by single-family homes and retail, though some associated structures still exist.

In addition to being a working orange grove, Lindley Bothwell and his wife, Helen Ann resided at the property. Bothwell, who came to own or manage over 30 ranches across Southern California, ran a business managing and providing services for other citrus orchards in the area and served for over 60 years as the coach of the University of Southern California Song Girls and Yell Leaders.

The Bothwells were also active in philanthropy and collected vintage cars, amassing a substantial and highly regarded collection of early automobiles. In addition, Lindley Bothwell was a train aficionado and installed a rail line, train storage shed, and a train station on the grounds of the subject property to accompany an 1890s light rail locomotive and cars. Following Ann Bothwell's death in 2016, the property ceased commercial operation and is currently for sale.

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

Although more research was conducted, there are no footnotes in the nomination. The bibliography is limited to the SurveyLA Survey Reports for two Community Plan Areas in the San Fernando Valley, the LACHCS for the Industrial Development Context, and a few newspaper articles published between 1978 and 2019. The nomination is not based upon any scholarly or primary sources. Most of the information in the statement of significance seems to be based upon an article in the *Los Angeles Times* (November 26, 1978) in which Bothwell was interviewed about the suburbanization of the San Fernando Valley. The nomination is not asserting that Bothwell was a significant person in national, state, or local history under Criterion 2. Thus, the new information about his car collection and extracurricular activities are irrelevant to the argument for HCM designation under Criterion 1.

The descriptive section of the nomination explained that there are no building permit records for the property. Some of the buildings are also mis-labeled and do not reflect the historic or current uses. The dates of construction were based upon a comparative analysis of aerial photographs. "It appears that at least the single-family dwelling, the storage building, and the garage and tool

shop were constructed prior to 1947, and the train storage shed was built between 1967 and 1989.” However, the analysis was limited to the aerial photographs included in an article in the *New York Times* (July 11, 2019) about the potential sale of the property. This article did not include the full array of aerial photographs available using online sources (see Figures 4-14).

DEVELOPMENT HISTORY

The following development history of the property was based upon additional research, which is presented in chronological order in Table 2 with citations. The modern origins of the property can be traced to the subdivision of Tract No. 2605 in 1914 by the Title Insurance and Trust Company. At that time, Ventura Boulevard was still called Ventura County Road. Most of the existing side streets, including Oakdale Avenue, had been laid out. Sometime after 1914, Henry R. Bristol, Sr. (1855-1928) purchased the lots (Lots 35, 39, 40, 41, 42, 43, and 44, see Figure 2) along Oakdale Avenue from Ventura Boulevard on the north to Wells Drive on the south. Bristol and his wife, Ella had been living in Santa Ana since 1882.² He was a pharmacist as was his father before him.³ By 1916, he had sold his business and the family had moved to the San Fernando Valley. The location of their home was consistently described as Owensmouth in contemporary sources but is nevertheless the subject property.⁴ There are no sources documenting that the orchard was ever 100 acres in size or had been planted with orange trees in 1920. The orchard was more likely 70 acres in size, which is the combined acreage of Tract No.2605 (see Figure 2). The earliest available aerial photograph of the property dates from 1928 (see Figure 4). The orchard was present by this time, so it could have been planted in 1920, though there is no definitive evidence of a planting date. The photograph also depicts two clusters of buildings, one on the north with a driveway from Ventura Boulevard and one on the south with access from Wells Drive. The cluster on the north included the home of Henry and Ella Bristol, Sr. In the 1924, they are listed in the City Directory at 19730 Ventura Boulevard. The buildings have been demolished, and the property is currently occupied by a shopping center. The cluster on the south included the home of their eldest son, Henry Bristol, Jr. The house at 19801 W. Wells Drive survives. A 1922 permit for additions and alterations to an existing house documents that it was owned by Henry Bristol Jr.⁵

Ella Bristol died in 1924 and Henry, Sr. in 1928. In 1926, Henry Bristol, Sr. and Samuel and Myra Bothwell agreed to a future acquisition of a portion of Lots 40 and 41 of Tract No. 2605 owned by Bristol.⁶ In 1929, the heirs of the Bristol estate sold the remaining property to a group of buyers including Samuel, Myra, Lindley, and Marion Bothwell; Paul J. Howard and Alaseba Howard; and Nels and Anette K. Nelson (see Figure 3). Thus, the reports that Bristol subdivided

² “Ella Bristol obituary,” *Santa Ana Register*, June 25, 1924.

³ “Bristol Avenue & H.R. Bristol,” O.C. History Roundup, accessed on April 12, 2022, <https://ochistorical.blogspot.com/2016/12/bristol-avenue-hr-bristol.html>

⁴ “Home Wedding,” *Santa Ana Register*, October 18, 1916.

⁵ 1922LA40447 H.R. Bristol 14 x 28 addition and 6 x 7 screen porch to house, Lot 39 of Tract 2605.

⁶ Quit Claim Deed recorded on February 17, 1930, between Citizens National Trust & Savings Bank of Los Angeles and Samuel and Myra Bothwell.

the property and that Bothwell purchased 20 or 30 acres in 1926 are not entirely accurate.⁷ Members of the Bothwell family ended up owning what became Lots 2 and 3 of Tract No. 10515, which is approximately 20 acres. The Howard family bought the former home of Henry Bristol Jr. on Wells Drive, which became Lot 1 of Tract No. 10515.⁸ Howard was in the nursery business and may have used the property as a weekend getaway as the family was still listed at 900 S. Rimpau Boulevard from 1930 and 1942.⁹

Lindley F. Bothwell married Marion Seale in 1927. In 1930, they were living in Beachwood Canyon, and he was working in the orange business.¹⁰ Thus, it appears that he owned the subject property which was already planted with orange trees but had not yet made the San Fernando Valley his home. The Los Angeles County Office of the Assessor estimates the date of construction of the house as 1934. This date is confirmed by the fact that Marion Seale Bothwell was registered to vote at this address. There are no scholarly sources on Bothwell's citrus business. The only contemporary source regarding Bothwell described him as an "agricultural adviser to film stars in the San Fernando Valley."¹¹ Bruce Bothwell recalled that his grandfather managed other citrus groves in the San Fernando Valley. He also remembered that oranges were not packed on the property, rather his grandfather was a member of the Sunkist Cooperative. The oranges from the property were picked and sent to a Sunkist plant in either Fillmore or Claremont where they were sorted, packed, and shipped. Another Bothwell venture was a fancy fruit gift box business much like Mission Pak, but smaller. While some of the fruit for the boxes was grown on the property, much was purchased from produce markets in Downtown.¹² Bothwell purchased a few acres of Lots 36 and 37 of Tract No. 2605 east of the orchard around 1940. By that time, Bothwell had constructed what appear to be garages, sheds, and a pergola type structure on APN 2164-008-006 (see Figure 5). These buildings appear to have supported his diverse businesses. Beginning in the 1940s, there are numerous sources that chronical Bothwell's' car collecting activities. In 1947, he constructed a storage shed for the collection on APN 2164-008-007, which had not been planted with orange trees (see Figure 7).¹³ This hobby grew into a business of leasing antique cars for film and television productions.

The long, rectangular shed present in the 1940 photograph was either removed or covered with trees in the 1947 photograph. The existing shed in this location was constructed by 1952 (see Figure 8). The HCM nomination inaccurately states that the garages and tool shop for the car collection were constructed prior to 1947. There were buildings in this location on the 1947 photograph; however, they are not the same as those on the 1960 photograph (see Figure 9). It is possible that these were the buildings destroyed by fire in 1949.¹⁴ The group of buildings on

⁷ Stephen A. Bristol Letter to the Editor, "Spec House Story Stirs Memories," *Los Angeles Times*, April 1, 1979.

⁸ Beginning in 1930 the Howards start to improve the property; 1930LA19021 P.J. Howard 11 x 24 addition to house Lot 1 of Tract 10515 and 1930LA05526 P.J. Howard private lounge for tennis court.

⁹ 1930 and 1940 U.S. Census; 1942 World War II Draft Registration Card.

¹⁰ 1930 U.S. Census.

¹¹ *San Francisco Examiner*, February 16, 1939.

¹² Teresa Grimes interview with Bruce Bothwell on April 20, 2022.

¹³ Los Angeles County Office of the Assessor and 1947 historic aerial photograph.

¹⁴ "Fire Destroys Antique Autos Used in Films," *Los Angeles Times*, February 5, 1949.

the north side of the road were constructed between 1952 and 1964 (see Figures 8, 9, and 10). Why they are described as “worker housing” in the HCM nomination is unclear; they are principally used for storage and workshop space. According to Bruce Bothwell, there was an apartment on the second floor for a caretaker.¹⁵ The train station and storage shed were constructed by 1978 (see Figure 12). The 1978 photograph also documents that the orchard was beginning to fade. There are numerous trees that had been removed. By 1980, the trees were virtually gone and by 1985 the orchard had been entirely replanted.

CONCLUSIONS AND RECOMMENDATIONS

Lindley and Marion Bothwell purchased the property in 1929, not 1926. The property they purchased had been part of a 70-acre, not 100-acre orchard. The property was not part of a vast orchard owned and operated by a significant company. Rather it was a relatively small family farm. As was custom with small citrus farmers, Bothwell was a member of a cooperative. Fruit was not sorted, packed, and shipped from the property. While Bothwell was no doubt a creative entrepreneur and successful businessman, no information was found indicating that he played a significant role in the history of agriculture in the San Fernando Valley. There are no permits for the construction of any of the buildings and structures on the property. Based upon a comparative analysis of aerial photographs, the estimated construction dates for the buildings, structures, and orchard are as follows: house (1934), storage building (1947), south shed (circa 1952), garages and tool shop (circa 1960), north workshop and storage buildings (circa 1952-1964), train station and shed (circa 1978), and orchard (circa 1985). The buildings and structures were used for a variety of purposes for Bothwell’s diverse businesses. While some were used to store farm equipment none could be accurately described as a packing house or worker housing.¹⁶ They were mostly related to his car and train collections and would not be considered character-defining features if the property was designated an HCM. APN 2164-008-007 was not historically part of the orchard and would also not be character-defining features if the property was designated.

Based upon this new information, the Bothwell Ranch does not appear to meet the eligibility standards for the grove/orchard property type in the *LACHCS*. The orchard was not planted within the period of significance, which ends in 1945. It was planted sometime between 1980 and 1985. The integrity considerations state “original trees may have been replaced over time,” which implies some, gradual tree replacement is acceptable— not wholesale replacement. Therefore, the property lacks integrity from the period of significance and cannot exemplify late nineteenth and early twentieth century citriculture.

I don’t recommend the HCM designation of the property. Designating a property based upon a popularly held but false belief would set a dangerous precedent. If nothing else, the nomination should be corrected based upon the additional information presented in this memorandum so the City Council can make an informed decision.

¹⁵ Teresa Grimes interview with Bruce Bothwell on April 20, 2022.

¹⁶ Ibid.

TABLE 2: CHRONOLOGICAL HISTORY OF THE PROPERTY		
Year	Event	Source (s)
1900	Henry Richard Bristol lives in Santa Ana with his wife, Ella and their four children. His occupation is druggist. He was born in Illinois in 1855.	U.S. Census, 1900, Ancestry.com
1902	Lindley Fowler Bothwell lives at 1997 Orchard Avenue with his parents Samuel Fowler Bothwell and Myra Lindley Bothwell. He was born in California in 1902.	U.S. Census, 1910, Ancestry.com
1910	H.R. Bristol, Sr. lives in Santa Ana with his wife, Ella and daughter, Marian. His occupation is not listed.	U.S. Census, 1910, Ancestry.com
1914	H.R. Bristol, Sr. buys 70 acres of Tract No. 2605.	Los Angeles Times, April 1, 1979 and Tract Map
1919-1924	L.F. Bothwell attends U.S.C.	U.S. School Yearbooks, Ancestry.com
1920	H.R. Bristol, Sr. lives on Ventura Road with his wife, Ella and son, Lawrence. His occupation is farmer. H.R. Bristol, Jr. lives on Wells Drive with his wife, Sue and their four children. His occupation is farmer.	U.S. Census, 1920, Ancestry.com
1920	L.F. Bothwell lives at 212 S. Ardmore Avenue with his parents and siblings.	U.S. Census, 1920, Ancestry.com
1921	L.F. Bothwell lives at 212 S. Ardmore Avenue with his parents and siblings.	1921 City Directory
1922	Lawrence Bristol dies.	Los Angeles Times, August 22, 1922
1924	L.F. Bothwell receives M.A. in History from U.S.C.	USC Digital Library
1924	H.R. Bristol Sr. lives with his wife Ella at 19730 Ventura Boulevard. His occupation is fruit grower.	1924 City Directory
1924	Ella Bristol dies.	Santa Ana Register, June 25, 1924
1926	H.R. Bristol Sr. agrees to sell Samuel and Myra Bothwell 20 acres of orange trees that were part of a 100-acre grove that was then six years old.	Quit Claim Deed, February 17, 1930 and Los Angeles Times November 26, 1978 <i>The HCM nomination appears to be based upon this 1978 article, but no original sources.</i>
1926	L.F. Bothwell graduates from Oregon Agricultural College, returns to Los Angeles, and buys an orange	https://osughost.imodules.com/s/resources/templ

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	grove. This was the start of a citrus empire that by 1943 had grown to 34 ranches, which he either owned or managed. At the time, he was considered by the U.S. Department of Agriculture to be one of the nation’s top-10 citrus farmers. He also had his own soil chemistry lab, served as an adviser to growers all over the southwest and was one of California’s leading cattle breeders. Home-based in the San Fernando Valley, his concerns stretched from San Bernardino to San Diego to Ventura. His professional affiliations included memberships in the American Society of Agronomy and the Society of Soil Scientists.	ates/login/index.aspx?gid=1&pgid=493 <i>This blog appears to be partially based upon the 1978 article in the LA Times. No primary sources could be found verifying any of these claims.</i>
1926	Marion Seale announces were engagement to L.F. Bothwell. She is attending Stanford University.	Stanford University Review, Vol. 27, No. 7
1927	L.F. Bothwell marries Marion Seale, who graduated in 1928.	https://osughost.imodules.com/s/resources/templates/login/index.aspx?gid=1&pgid=493 U.S. Marriage Index, Ancestry.com <i>Other sources confirmed that Seale graduated in 1927 – not 1928.</i>
1927	Marion Seale graduates for Stanford.	Oakland Tribune, May 17, 1953
1928	H.R. Bristol, Sr. dies.	U.S. Find a Grave Index, Ancestry.com
1928	The property is entirely planted with orange trees at this time. There is a collection of buildings with a driveway from Ventura Boulevard on the north (the home of H.R. Bristol, Sr.) and another collection of buildings with a driveway from Wells Drive on the south (the home of H.R. Bristol, Jr.) This house still stands at 19801 W. Wells Drive.	UCSB Geospatial Collection <i>The larger orange grove visible in the photograph is essentially the same as Tract No. 10515, which is approximately 70 acres.</i>
1929	Tract No. 10515 is subdivided from the estate of H.R. Bristol, Sr. The owners include Samuel, Myra, Lindley, and Marion Bothwell and Paul J. Howard and Alaseba Howard. The Howard family buys the former home of H.R. Bristol, Jr. on Wells Drive.	Tract Map, Los Angeles County Land Records <i>This may have been the actual date Bothwell purchased the property –</i>

Grimes Peer Review Memorandum

		<i>not 1926. The subdivision was approximately 70 acres.</i>
1930	L.F. Bothwell lives at 2327 (or 23274) Beachwood Drive with his wife Marion Seale Bothwell. His is a farmer in the orange business.	California Voter Registrations and U.S. Census, 1930, Ancestry.com
1930	H.R. Bristol, Jr. lives in Oregon with his family. His occupation is farmer.	U.S. Census, 1930, Ancestry.com
1930s	There are numerous articles about the Bothwell family in society pages regarding club activities, charitable events, marriages, etc. and only one regarding ranching in 1939.	Various newspapers, Ancestry.com
1930	Bothwell's fancy fruit box business begins. At the same time, he has his own soil bacteriological laboratory, providing pruning, spraying and other services to 40 ranches from San Francisco to the Mexican border.	Los Angeles Times November 26, 1978 <i>No other sources could be found verifying most of this information. Additionally, the house was not constructed until 1934. The existing south shed dates from 1952 but appears to have replaced an older building from the 1940s.</i>
1934	Marion Seale Bothwell lives on Ventura Boulevard. No address number was included.	California Voter Registrations, Ancestry.com
1934	The existing house is constructed.	Los Angeles County Office of the Assessor
1938	L.F. Bothwell lives at 5000 Oakdale Avenue. His occupation is rancher.	California Voter Registrations, Ancestry.com <i>Apparently, the street was renumbered around 1950.</i>
1939	Bothwell is mentioned i as an "agricultural advisor to film stars in the San Fernando Valley driving one of his four Rolls Royce trucks."	San Francisco Examiner February 16, 1939

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1940s	There are numerous articles about L.F. Bothwell regarding his automobile collection but none regarding ranching.	Various newspapers, Ancestry.com
1940	L.F. Bothwell lives at 5000 Oakdale Avenue with his wife Marion Seale, son L.F. Jr, and daughter, Bonnie. His occupation is farmer.	U.S. Census, 1920, Ancestry.com
1940	The house and south shed are present at this time. The south shed was used for farm equipment. There is a pergola type structure in the current location of the garage and tool shop. There appear to be small structures in the current location of the “worker housing.”	UCSB Geospatial Collection
1942	L.F. Bothwell lives in Canoga Park with his wife Marion Seale.	World War II Draft Card, Ancestry.com
1944	Marion Seale Bothwell lives at 5000 Oakdale Avenue.	California Voter Registrations, Ancestry.com
1944	The property remains the same as it was in 1940.	UCSB Geospatial Collection
1947	The storage building for Bothwell’s car collection is constructed.	Los Angeles County Office of the Assessor
1947	The house and storage building are present at this time. The south shed was either removed or covered with trees in the photograph.	Historic Aerials.com <i>The HCM nomination states the garage and tool shop are constructed by 1947, but this is a misreading of the photograph.</i>
1949	Marion Seale Bothwell lives in Oakland with her children Lindley Jr. and Bonnie.	1949 City Directory
1949	A fire destroys 32 antique vehicles; presumably the buildings they were stored in were destroyed as well.	Los Angeles Times, February 5, 1949
1950	Helen Ann Bothwell lives at 5300 Oakdale Avenue.	California Voter Registrations, Ancestry.com <i>There is no online record of a divorce and re-marriage.</i>
1952	The house and storage building remain. The pergola and garage are gone. The current south shed is	Historic Aerials.com

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	present. The first floor was used for farm equipment and the second floor for the car collection.	
1954	L.F. Bothwell lives at 5300 Oakdale Avenue.	California Voter Registrations, Ancestry.com
1960	The house, storage building, south shed remain. The garage and tool shed are present.	UCSB Geospatial Collection
1964	The house, storage building, south shed, garage and tool shed remain. The “worker housing” is present.	Historic Aerials.com <i>The building identified in the HCM nomination as “worker housing” is a multipurpose building with a workshop and storage as well as a caretaker’s unit on the second floor.</i>
1967	The property remains the same as it was in 1964.	Historic Aerials.com
1971	The property remains the same as it was in 1964.	UCSB Geospatial Collection
1978	The property remains mostly the same as it was in 1964. The train station and storage shed are present, and the immediate area is still planted with orange trees.	Historic Aerials.com
1980	The buildings and structures on the property remain the same as they were in 1964; however, <u>the trees on the 10-acre parcel are essentially gone.</u>	Historic Aerials.com
1985	The trees are replanted on the 10-acre parcel.	Historic Aerials.com
1987	Marion Seale Bothwell dies.	U.S. Death Index, Ancestry.com
1994	L.F. Bothwell lives at 5300 Oakdale Avenue.	U.S. Phone and Address Directories, Ancestry.com
1996	L.F. Bothwell dies.	U.S. Find a Grave Index, Ancestry.com
2016	Helen Ann Bothwell dies.	U.S. Find a Grave Index, Ancestry.com

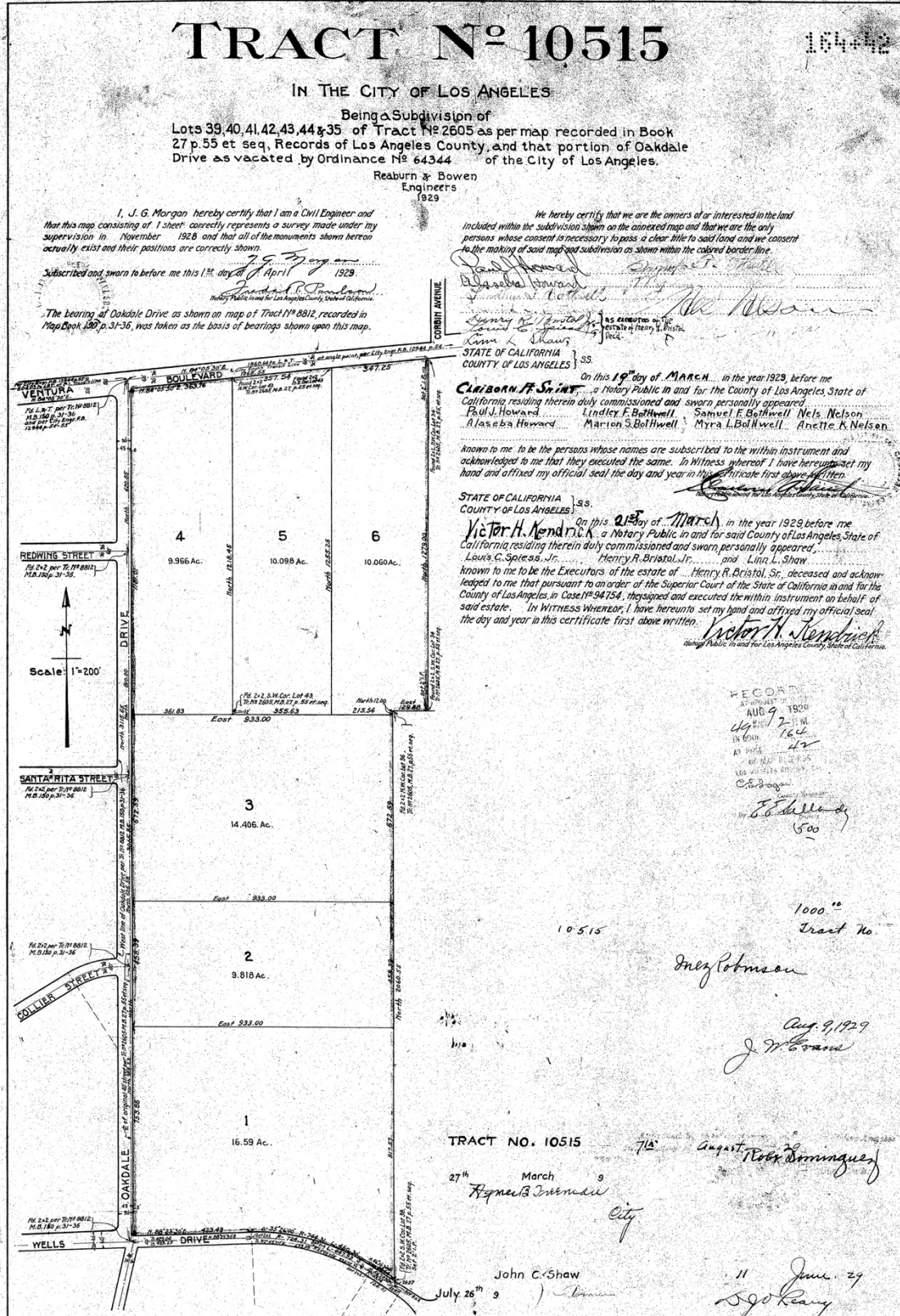


Figure 3: Tract Map No. 10515



Figure 4: 1928 aerial photograph, UCSB Geospatial Collection, approximate boundary of property outlined in red. Note orange trees are planted, but no buildings or structures are present.



Figure 5: 1940 aerial photograph, UCSB Geospatial Collection, approximate boundary of property outlined in red. Note orange trees are planted, road cuts through the middle of the property, the house is on the south side of the road, and there are various buildings and structures on the southeast side of the property.



Figure 6: 1944 aerial photograph, UCSB Geospatial Collection, approximate boundary of property outlined in red. Note the property remained unaltered from 1940.



Figure 7: 1947 aerial photograph, NETR Historic Aerials.com, approximate boundary of property outlined in red. Note the construction of storage building for the car collection on east.



Figure 8: 1952 aerial photograph, NETR Historic Aerials.com, approximate boundary of property outlined in red. Note the structure and buildings that once stood on the southeast are gone.



Figure 9: 1960 aerial photograph, UCSB Geospatial Collection, approximate boundary of property outlined in red. Note the garage and tool shed are present, but the orange trees are beginning to fade.



Figure 10: 1964 NETR Historic Aerials.com, approximate boundary of property outlined in red. Note the construction of the north storage buildings and the orange trees are continuing to fade.



Figure 11: 1971 aerial photograph, UCSB Geospatial Collection, approximate boundary of property outlined in red. Note the property remained unaltered from 1964.



Figure 12: 1978 NETR Historic Aerials.com, approximate boundary of property outlined in red. Note the construction of the train station and shed and the orange trees are continuing to fade.



Figure 13: 1980 NETR Historic Aerials.com, approximate boundary of property outlined in red. Note the orange trees are essentially gone.



Figure 14: 1985 NETR Historic Aerials.com, approximate boundary of property outlined in red. Note the orange trees have been replanted.

Exhibit C

Teresa Grimes | Historic Preservation

Teresa.Grimes@icloud.com

323-868-2391

February 4, 2025

City Planning Commission
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Re: Response to Appeal, 5300 Oakdale Avenue; VTT-83927; ZA-2023-2170-ZAD-ZV-ZAA; ENV-2020-6762-EIR (Program EIR)

Dear President Lawshe and Planning Commissioners:

I am a qualified Architectural Historian and Historian under the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) and have more than 35 years of experience in the identification, evaluation, and documentation of properties as historical resources as well as the analysis of impacts on significant resources pursuant to federal, state, and local laws and regulations. My resume is attached for your consideration. I am writing in response to the appeal of the proposed project (Project) at 5300 Oakdale Avenue. The Appellant argues that the Project will have impacts not addressed in the Housing Element EIR, including impacts on historical resources. The Appellant fails to acknowledge, however, that impacts on historical resources were fully analyzed in a professionally peer-reviewed assessment report that is part of the public record. The "5300 Oakdale Avenue, Los Angeles, California, Historical Resource Assessment Report" (Historic Report) dated January 2024 and prepared by my firm, provided an in-depth evaluation of the property and concluded it was not a historical resource as defined by CEQA. Therefore, the Project will have no impacts on historical resource because there are none on the Project site or immediate vicinity.

Properties identified by SurveyLA are not mandatory or presumptive historical resources

The Appellant notes that the property was identified by SurveyLA, the city-wide historic resource survey of Los Angeles, but misrepresents its meaning. SurveyLA was a reconnaissance-level survey that systematically identified properties potentially eligible under federal, state, and local landmark and historic district programs. The survey was conducted from the public right-of-way and site-specific research was limited. The City's "CEQA Guide for Historical Resources" adopted in September 2024 clearly states that properties identified by SurveyLA are not mandatory or presumptive historical resources. The City has the discretion to consider such properties as historical resources unless a preponderance of evidence demonstrates otherwise. The City makes the determination regarding the treatment of properties as historical resources for CEQA purposes based upon the whole record including studies prepared by qualified professionals. It is not unusual for properties identified as potential historical resources by SurveyLA to be

determined ineligible for designation based upon further investigation. Such was the case with the property at 5300 Oakdale Avenue.

Properties rejected as HCMs are not mandatory or presumptive historical resources

The Appellant references the Letter of Determination issued by the Zoning Administrator (ZA) and notes the City Council declined to list the property as a Historic-Cultural Monument (HCM) based upon evidence it did not meet the criteria. The Appellant cites the Staff Report prepared by the Office of Historic Resources (OHR) and Cultural Heritage Commission (CHC) to support its contention that the property qualifies as a historical resource under CEQA. However, a recommendation by the CHC to the City Council to designate a property as a HCM does not make it a historical resource as defined by CEQA. While a property *designated* as a HCM is presumed to be historical resource for CEQA purposes, one that has been *nominated and rejected* is not. According to the Cultural Heritage Ordinance, only the City Council has authority to designate properties as HCMs – not the CHC or OHR Staff.

The Appellant denigrates the City Council’s decision to decline the HCM nomination as “politically infused” rather than face the facts it does not meet the criteria based upon the whole record. In addition to the CHC Staff Report, which omitted important information, the City Council considered in its decision other information that demonstrated the property is not historically significant.

Criteria for HCM designation are not the same as those for National or California Registers

The Appellant has based their argument that the property is eligible for listing in the National and California Registers on the limited information in the HCM nomination even though the criteria are not the same. This is why locally designated historical resources (i.e., HCMs) are *presumptive* rather than *mandatory* historical resources. In many cases, a designated HCM will not be eligible for listing in the National or California Registers because it is less than 50 years of age or lacks physical integrity. The Cultural Heritage Ordinance does not include a minimum age requirement or a physical integrity requirement for a property to be a designated HCM.

The ZA did not assume the City Council’s decision to decline the HCM nomination meant the property was not a historical resource for CEQA purposes, as suggested by the Appellant. Rather, the ZA considered the evidence and conclusions in the Historic Report, which evaluated the property based on the applicable criteria for listing in the National and California Registers and concluded that it is not eligible. The Historic Report was prepared in accordance with the City’s requirements, reviewed by the City’s expert staff, and its findings were accepted as valid by the Department of City Planning.

Age and 50 Year Rule

The Appellant notes that the property operated as a commercial citrus grove between 1926 and 2016. As the Cultural Heritage Ordinance does not have a minimum age requirement, the HCM nomination concluded that the period of significance ended at 2016. To be eligible for listing in

the National and California Registers, however, a property must have achieved significance more than 50 years ago. Thus, to be eligible for listing in the National or California Registers when the environmental review as conducted in 2024, the property at 5300 Oakdale Avenue must have achieved significance by 1974, 50 years ago, or meet special requirements. Properties less than 50 years of age must be exceptionally important to be considered eligible for listing in the National Register. Properties less than 50 years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand their historical importance. As discussed below, the property was not significant as of 1974 and is not of exceptional importance.

Criterion A - Agriculture

The Appellant claims the property is eligible under National Register Criterion A because it “is associated with the once-dominate citrus industry in Los Angeles as the last operating commercial orange grove in the San Fernando Valley.” This is the same argument for HCM designation that was rejected by the City Council, and no new information has been provided.

There is no evidence the grove played a significant role in the history of agriculture before 1974. According to *National Register Bulletin #15*, "Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well."¹

The grove was originally planted in 1926 and was merely part of a trend that was already well established. As discussed in the *Los Angeles Citywide Historic Context Statement* for Industrial Development:

Oranges were introduced to the region around 1804 at Mission San Gabriel, and Mission trees formed the basis of groves of several Los Angeles growers. The first orange grove in Los Angeles was laid out in 1834, when William Wolfskill planted 70 acres near present day Fourth and Alameda Streets. Wolfskill was later reported to own more than two-thirds of California’s orange groves.²

The grove on the subject property is not especially old in the context of the citrus industry in Los Angeles and as explained in the Historic Report, the grove was completely replaced between 1980 and 1985. Even if the original grove remained from 1926, a property is not automatically significant simply because of its age. To be eligible, the property must be significant in the history of agriculture beyond its age, which has not been demonstrated by the Appellant.

¹ Patrick Andrus and Rebecca Shrimpton, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: U.S. Department of the Interior, 1997), 12.

² LSA Associates, “Context: Industrial Development, 1850-1980,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, December 2015), 20.

Criterion A - Entertainment

The Appellant claims the property is significant in the context of the entertainment industry as the location of the “first live outdoor dramatic color television broadcast.” “All the Trees in the Field” was an episode of the NBC anthology series *Matinee Theater* filmed on the property at 5300 Oakdale Avenue on January 11, 1956. The Appellant does not cite any scholarly sources on the history of television explaining how this event was a milestone, nor were any found in the preparation of this response. In fact, credible evidence documents earlier live television broadcasts, including color broadcasts. Some sources note the first live outdoor television broadcast as the Epsom Derby on June 3, 1931, and others note a simple shot from a park in London on November 10, 1936; in both cases the broadcasts aired on BBC.³ Fifteen years later on June 25, 1951, CBS aired the first live color television broadcast, which was the variety show “Premiere.” The first live outdoor color broadcast was the Tournament of Roses Parade on NBC on January 1, 1954. Naturally, sporting events and news segments would continue to be broadcast live and in color outside.

Just like the last of its kind is not necessarily significant, neither is the first. In this case, the Appellant is creating a “first” by splitting hairs (claiming it was the first “dramatic” outdoor live color broadcast), which is why the context of filming on location is so important. *National Register Bulletin #15* states “the significance of a property can be judged and explained only when it is evaluated within its historic context.”⁴ The *Los Angeles Citywide Historic Context Statement* for The Entertainment Industry includes the theme Filming Locations Associated with the Motion Picture and Television Broadcasting Industries, 1908-1980. The theme provides an overview of location filming dating back to the 1890s. With regard to the history of television, the theme explains that the industry was moving away from live programming toward filmed programming in the mid-1950s:

As television found its way into more homes across the United States in the 1950s, the commercial television industry began to evolve from live programming toward filmed programming. This shift allowed scripted-content genres, such as dramas and comedies, to flourish in the mid-1950s.⁵

³ “A Brief History of Outside Broadcasting,” *Ross Video*, posted on May 21, 2024, https://www.rossvideo.com/blog/a-brief-history-of-outside-broadcasting/#:~:text=The%20First%20Outside%20Broadcast&text=In%20the%20early%20days%20of,crew%20on%20November%2010%2C%201936;‘The%20First%20Outside%20Television%20Broadcast,’%20Epsom%20&%20Ewell%20History%20Explorer,accessed%20on%20January%2031,%202025,https://eehe.org.uk/28911/outsidetv/#:~:text=Baird's%20'Caravan'%20by%20the%20winning,transmission%20facilities%20of%20the%20latter;‘Outside%20Broadcasting,’%20Wikipedia,accessed%20on%20January%2031,%202025,https://en.wikipedia.org/wiki/Outside_broadcasting

⁴ *National Register Bulletin #15*. 7.

⁵ Historic Resources Group, “Context: The Entertainment Industry, 1908-1980,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, September 2019), 24

Westerns were just as popular as television shows as motion pictures, which was enhanced by the authenticity created by filming on location:

The late 1950s saw an exponential rise in the number of action-oriented Westerns on television, including *Cheyenne*, *Gunsmoke*, *Maverick*, *Have Gun – Will Travel*, and *The Rifleman*. Although filming was still primarily limited to the studio, the Western’s natural inclusion of outdoor action sequences began to signal the forthcoming trend of filming on location for television, and sequences for many of television’s early Westerns were filmed amidst the surrounding landscape of Southern California at movie ranches owned by studios or independent producers.⁶

“The Lone Ranger” on ABC from 1949 to 1957 and “Hopalong Cassidy” on NBC from 1949 to 1952 are also examples of early Western television series that incorporated scenes filmed on outdoor sets. The syndicated “The Cisco Kid” had been filmed in color since 1949 in anticipation of color broadcasting.

The producers of *Matinee Theater* did not incite NBC to create programming in color as implied by the Appellant. NBC was already at the forefront of color programming because its parent company RCA manufactured the most successful line of color television sets.⁷ During the 1955-56 television season, three regularly scheduled programs were broadcast in color. The 1956-57 season would feature 17 series filmed in color.

As noted above, the first live outdoor color television broadcast was the Tournament of Roses Parade on NBC on January 1, 1954. The episode “All the Trees in the Field” aired two years later on January 11, 1956. The only factor that stands out in the Appellant’s claim of significance is “drama.” The fact that the program was a drama instead of a variety show or a Western does not appear to be of any consequence in the history of television. Furthermore, this is when television was shifting away from live programming toward filmed programming, so in this regard “All the Trees in the Field” was at the end rather than the beginning of the trend.

Even if the episode “All the Trees in the Field” was an important milestone in the history of television, the period of significance would be 1956. The Appellant does not identify the physical features of the property that would illustrate this moment in time. Additionally, to be eligible for listing in the National Register, the property would need to retain sufficient integrity from 1956 to convey the significance, which is not the case.

Criterion B – Lindley Bothwell

The potential significance of the property in relation to Lindley Bothwell (1901-1986) was fully analyzed in the Historic Report and found ineligible for listing under Criterion B. To be eligible for listing under Criterion B, a property must be associated with the lives of persons significant in our

⁶ Ibid.

⁷ Gorham A. Kindem, “Hollywood’s Conversion to Color: The Technological, Economic, and Aesthetic Factors,” *Journal of the University Film Association*, Vol. 31, No. 2, (Spring 1979), 35.

past. Several steps are involved in determining whether a property is significant under Criterion B. First, the person must be significant within a historic context. Second, the property must be associated with the person's productive life. Finally, the property must be compared with other associated properties to identify the best representation of the person's historic contributions.

From 1929 to 1986, the property at 5400 Oakdale Road was owned and occupied by Bothwell and his family. No evidence was found indicating that he was significant within a historic context. Bothwell's activities included cheerleading (or yelling), farming, fundraising, and car collecting and racing. *National Register Bulletin #15* states the person's activities must be "demonstrably important" within national, state, or local history.⁸ Having interesting hobbies, working in an identifiable profession, or being fondly remember by a community is not justification for significance under Criterion B. Of all of his activities, car collecting was the most notable. Even if there was a context developed for this topic and Bothwell was considered a significant figure, the importance would be attached to the collection, not the buildings in which the collection was stored. Criterion B is typically restricted to properties that illustrate through it physical features the person's important achievements.⁹ Thusly, the Historic Report correctly concluded the property is ineligible for listing under Criterion B. The storage sheds on the property are utilitarian in design and do not express the collection they once, but no longer contain. The Appellant does not offer any new credible information regarding Bothwell, merely a different opinion, which is inconsistent with the National Park Service guidance.

Period of Significance

Since the property was found ineligible for listing in the National and California Registers in the Historic Report, it has no period of significance. For historically significant properties, however, the period of significance is usually measured by the length of the association(s). If a property is eligible under more than one criterion for significance and/or more than one context, each must be identified. Thus, the period of significance under Criterion A would be different from Criterion B, and the period of significance in the context of citrus industry would be different from the period of significance in the context of the entertainment industry. Nevertheless, the Appellant argues that the period of significance simply ends in 2016 when the owners stopped operating it as a commercial citrus grove. The Applicant is not only incorrectly applying the concept, but they are also incorrectly conflating continued use with historic significance.

A property is not automatically significant because of the length of its use as suggested by the Appellant. National Park Service guidance for determining a period of significance states that:

Continued use or activity does not necessarily justify continuing the period of significance. The period of significance is based upon the time when the property made the contributions or achieved the character on which significance is based.

⁸ *National Register Bulletin #15*. 14.

⁹ *Ibid.*

Fifty years ago is used as the closing date for periods of significance where activities begun historically continued to have importance and no more specific date can be defined to end the historic period. (Events and activities occurring within the last 50 years must be exceptionally important to be recognized as "historic" and to justify extending a period of significance beyond the limit of 50 years ago.)¹⁰

The argument the property is significant under National Register Criterion A in the citrus industry context is fatally flawed because it is based upon the twisted notion that the importance is the continued use. According to family history, after the death of Bothwell in 1986, his wife Annie kept the trees alive in his honor. Once they were no longer profitable, she sold other assets to keep watering them. When she died in 2016, the heirs decided to sell the property. This is the story of a woman keeping the memory of her late husband alive, not the story of a citrus grove significant in the agricultural history of Los Angeles.

Conclusion

The property at 5300 Oakdale Avenue is not currently designated under national, state, or local landmark or historic district programs. The property was identified in the 2012 historic resource survey of the Encino – Tarzana CPA as appearing eligible for listing in federal, state, and local registers of historical resources. After careful inspection, investigation, and evaluation, the Historic Report concluded that none of the buildings, structures, or sites on the property appear to be individually or collectively eligible for listing in the National and California Registers due to a lack of significance. The Los Angeles City Council determined the property does not qualify for designation as a HCM. Thus, the property is not a historical resource as defined by CEQA and as a result the Project would not cause any site-specific impacts on historical resources.

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in cursive script that reads "Teresa Grimes". The ink is dark and the signature is fluid and legible.

Teresa Grimes

¹⁰ Linda McClelland, Linda, Carol D. Shull, James Charleton, et, *National Register Bulletin #16A: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: U.S. Department of the Interior, 1997), 42.

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Teresa Grimes has 30 years of experience in the field of historic preservation. She is widely recognized as an expert in the identification and evaluation of historical resources having successfully prepared dozens of landmark and historic district nominations for a wide variety of property types. Teresa graduated from the University of California with a Master of Art degree in Architecture and has worked in the private, public, and non-profit sectors. She has extensive experience in the preparation of environmental compliance documents in accordance with the California Environmental Quality Act (CEQA) including the identification of historical resources, analysis of direct, indirect, and cumulative impacts, and development of mitigation measures. Teresa has also managed the preparation of historic structure reports and worked with architects, engineers, and conservators to comply with the Secretary of the Interior’s Standards for the Treatment of Historic Properties. Some of her CEQA projects are listed below.

Educational Background

- M.A., Architecture, University of California, Los Angeles, 1992
- B.A., Political Science, University of California, Los Angeles, 1986

Qualifications

- Meets the Secretary of the Interior’s Professional Qualifications Standards for history and architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.

Professional Activities

- Friends of Residential Treasures: Los Angeles, Board Member, 2024-Present
- Pasadena Heritage, Board Member, 2008-2012
- Highland Park Heritage Trust, Board Member, 1996-1998
- West Hollywood Cultural Heritage Advisory Board, Board Member, 1990-1994

Professional Experience

- Teresa Grimes | Historic Preservation, Principal, 1999-2005, 1993-1994, 1991-1992, 2020 - Present
- GPA Consulting, Principal Architectural Historian, 2009-2020
- Christopher A. Joseph & Associates, Senior Architectural Historian, 2006-2009
- Historic Resources Group, Architectural Historian, 1994-1998
- Getty Conservation Institute, Research Associate, 1992-1993
- Los Angeles Conservancy, Preservation Officer, 1988-1991

Selected Projects

- Art Center College of Design Master Plan, Pasadena, Historical Resource Technical Report, 2016
- Baldwin Hills Crenshaw Plaza, Los Angeles, Historical Resource Technical Report, 2010
- Campbell Hall Master Plan, Los Angeles, Historical Resource Technical Report, 2007
- City of Hope Specific Plan, Alhambra, Historical Resource Survey and Technical Report, 2016
- Claremont Graduate University Master Plan, Claremont, Historical Resource Survey and Technical Report, 2015
- Claremont McKenna College Master Plan, Claremont, Historical Resource Survey and Technical Report, 2008-2010
- CF Braun & Company Plan, Alhambra, Historical Resource Technical Report, 2020
- Downtown Specific Plan Update, El Segundo, Historical Resource Technical Report, 2021-Ongoing
- Emerson College Hollywood Campus, Los Angeles, Historical Resource Technical Report, 2010
- Los Angeles Aerial Rapid Transit Project, Los Angeles, 2020-2022
- Los Angeles County Museum of Art Master Plan, Los Angeles, Historical Resource Technical Report, 2020
- Oakwood School Master Plan, Los Angeles, Historical Resource Technical Report, 2016
- Scripps College, Claremont, Secretary of the Interior’s Standards Compliance, 2020-2021
- Silver Lake Reservoir Master Plan, Los Angeles, Secretary of the Interior’s Standards Compliance, 2020-2021
- TVC 2050 Specific Plan, Los Angeles, Peer Review, 2021-2024
- West LA Commons, Los Angeles, Peer Review, 2021-2022
- Westlake /MacArthur Park Project, Los Angeles, Historical Resource Technical Report, 2020-2024

Exhibit D



PROTECTED TREE REPORT

PREPARED FOR

Oakdale Estates, LLC
11766 Wilshire Blvd. Suite 820
Los Angeles, CA 90025

PROPERTY

5300 Oakdale Ave
Woodland Hills, CA 91364
APNs 2164-008-001, -005, -006, and -007
Council District 3, Encino -Tarzana Community Plan

CONTACT

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February 7, 2024

PREPARED BY

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ASSIGNMENT

The Assignment included:

- Field Observation and Inventory of Trees on Site
- Recommendations for the protection of trees to remain
- Photographs of the subject trees are included in Appendix B
- Matrix of proposed protected tree removals and protected trees to remain
- Evaluation of potential construction impacts
- A Tree Location Plot Map is included in Appendix A
- Protected tree construction impact guidelines

LIMITS OF THE ASSIGNMENT

The field inspection was a visual, grade level tree assessment. No special tools or equipment were used. No tree risk assessments were performed. My site examination and the information in this report is limited to the date and time the inspection occurred. The information in this report is limited to the condition of the trees at the time of my inspection.

TREE CHARACTERISTICS AND SITE CONDITIONS

Detailed information with respect to size, condition, species and recommendations are included in the Summary of Field Inspections in Appendix C. The trees are numbered on the Tree Location Map in Appendix A.

PROTECTED TREE REPORT

5300 Oakdale Ave, Woodland Hills, CA 91364

SUMMARY AND OVERVIEW

PROJECT OVERVIEW	
Site Address	5300 Oakdale Ave, Woodland Hills, CA 91364
Location and/or Specific Plan	Woodland Hills
Project Description	21 New Single Family Residences
Date of Site Inspection	04/29/23 and 01/28/24
Number of Protected Trees on Site	3
Number of Recommended Removals	0
	Overall Area: 612,868.50 sq.ft. (14.07 AC); Proposed Area: 426,848.03 sq.ft. (9.91 AC); MRCA Preservation Area: 186,020.47 sq.ft. (4.16 AC)

The property located at 5300 N. Oakdale Avenue, Los Angeles, CA 91364, Oakdale Estates, is an intact 14-acre citrus orchard straddling the neighborhoods of Tarzana and Woodland Hills. Oakdale Estates, LLC is proposing to preserve approximately 4.16 acres of the orchard including existing drives and adding a new caretaker unit on the preserved property in conjunction with developing 21 single family lots on the remaining 9 acres of property, consistent with the zoning. Furthermore, as a feature to the proposed project; two rows of citrus trees on approximately 0.39 acres and most of the Washingtonian Fan Palm trees located along Oakdale Avenue will be retained. A suitable public agency will be selected to take title to the preserved area. There are a total of 1,451 citrus trees on site. A total of 1,143 trees in the north and south groves are proposed removals and 308 trees will be preserved and replanted. A further discussion of the Citrus trees is in Exhibit D.

PROTECTED TREES, URBAN FORESTRY DIVISION

This property is under the jurisdiction of the City of Los Angeles and guided by the Native Tree Protection Ordinance No. 186873. **Protected Trees** are defined by this ordinance as oaks (*Quercus* sp) indigenous to California but excluding the scrub oak (*Quercus dumosa*); Southern California black walnut (*Juglans californica* var. *californica*); Western sycamore (*Platanus racemosa*) and California bay laurel (*Umbellularia californica*) trees with a diameter at breast height (DBH) of four inches (4") or greater. **Protected Shrubs** are defined as Mexican elderberry (*Sambucus mexicana*); Toyon (*Heteromeles arbutifolia*) which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub.

At this time I observed three (3) coast live oak (*Quercus agrifolia*) trees on the property. (See Appendix A.1 for Tree Location Map) These trees will be retained and protected in place. One (1) coast live oak is located on the proposed area for construction, and will be retained and protected in place. Two (2) coast live oaks are located on the preserved area and will also be retained and protected in place. Please refer to the Appendix A.1 Tree Location Map on page 20.

NEIGHBOR TREES - OFFSITE TREES

There are six (6) coast live oak trees on the neighboring adjacent properties that will not be impacted by construction.

These trees will be retained and protected in place and are offsite on the preserved land where no construction will occur.

CITY OF LOS ANGELES STREET PARKWAY TREES, URBAN FORESTRY DIVISION

At this time, I observed nineteen (19) **City of Los Angeles Street Trees** in the parkway perimeter of the property. These street trees were approximately 60 foot tall Fan Palms.

Fifteen (15) trees will receive no impact and will be retained, four (4) trees are recommend for removal due to driveway installation and required road widening. City Department of Engineering was contacted, and they have agreed to reduce the required pavement section along Oakdale Avenue enough to preserve the remaining palm trees.

NON-PROTECTED SIGNIFICANT TREES, DEPARTMENT OF CITY PLANNING

The Department of City Planning requires the identification of the location, size, type and condition of all existing trees on the site with a DBH (Diameter at breast height = 54" above grade or 4.5") of 8 inches (8") or greater. These trees will be identified as **Non-Protected Significant Trees**.

At this time, I observed (9) Non-Protected Significant Trees on the property.

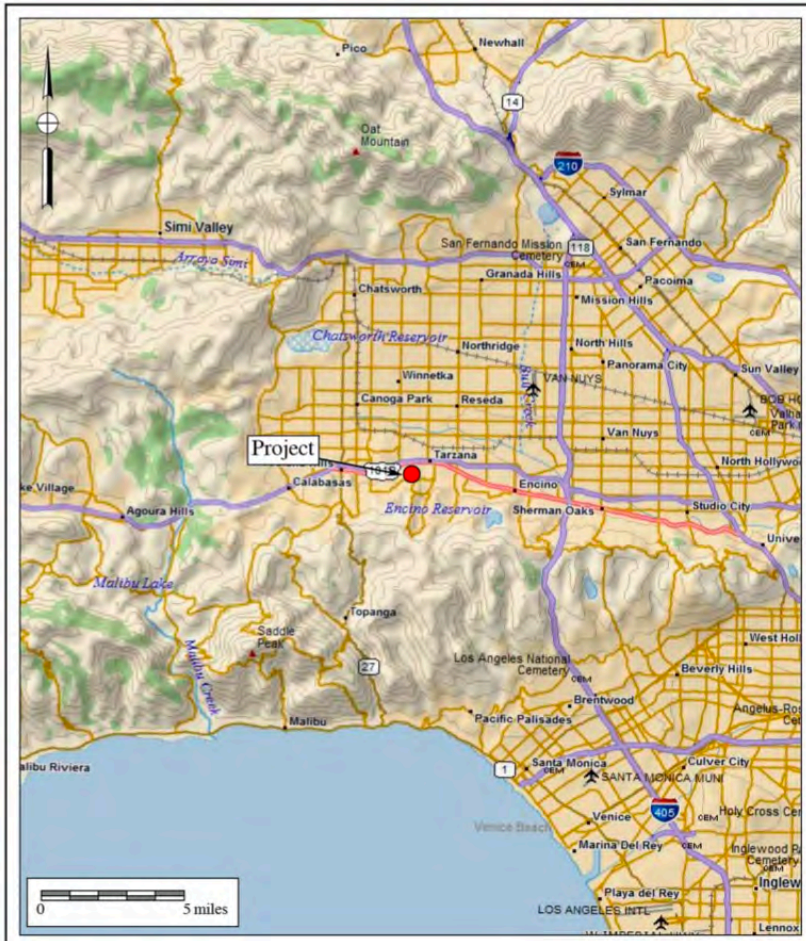
Three (3) trees are located in the area of construction. Canary pine trees #5, #10 and #11 will be impacted by construction and are recommended for removal and replacement to the satisfaction of the City of Los Angeles Department of City Planning.

Six (6) other non-protected significant trees will be retained and protected in place in the preserved area.

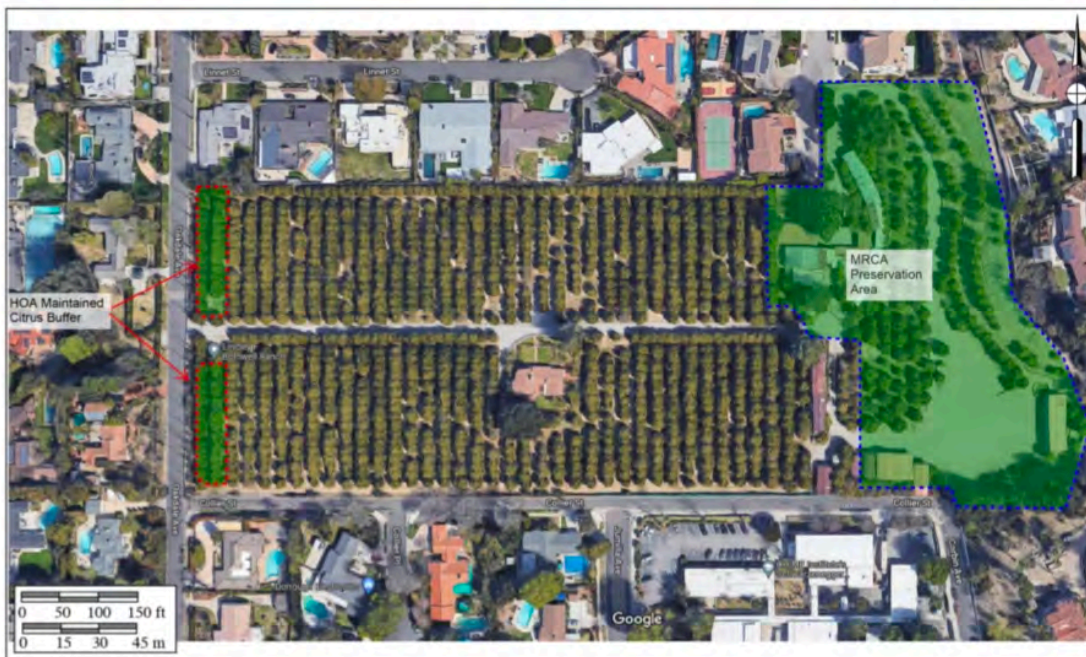
NEW TREES

In addition to the 308 trees being preserved and replanted, (57 of the 308 are being replanted in the area along Oakdale Avenue) the project will plant/install 328 new native trees and shrubs on the property, such as coast live oak (*Quercus agrifolia*), Western Sycamore (*Platanus racemosa*) and toyon shrub (*Heteromeles arbutifolia*). Along Collier Street, 66 of the new trees will be installed. 212 new native trees/shrubs will be installed within the areas of construction, and 50 new native trees/shrubs will be planted in the preserved area in locations determined by the preservation agency.

PROPERTY LOCATION



AERIAL PHOTO OF PROPERTY



IMPACT ANALYSIS AND SPECIFIC RECOMMENDATIONS

PROTECTED TREES #1

Oak tree #1 is the solo protected tree within the future buildable pads on lot 16. This tree is setback 10'-6" from the edge of the proposed residence and a retaining wall will be constructed around this tree to mitigate grading differences. Exploratory trenching was performed around this tree and revealed no significant roots. This tree will tolerate the proposed retaining wall construction and will receive minimal impact and will be retained. See illustration below for retaining wall around oak #1.

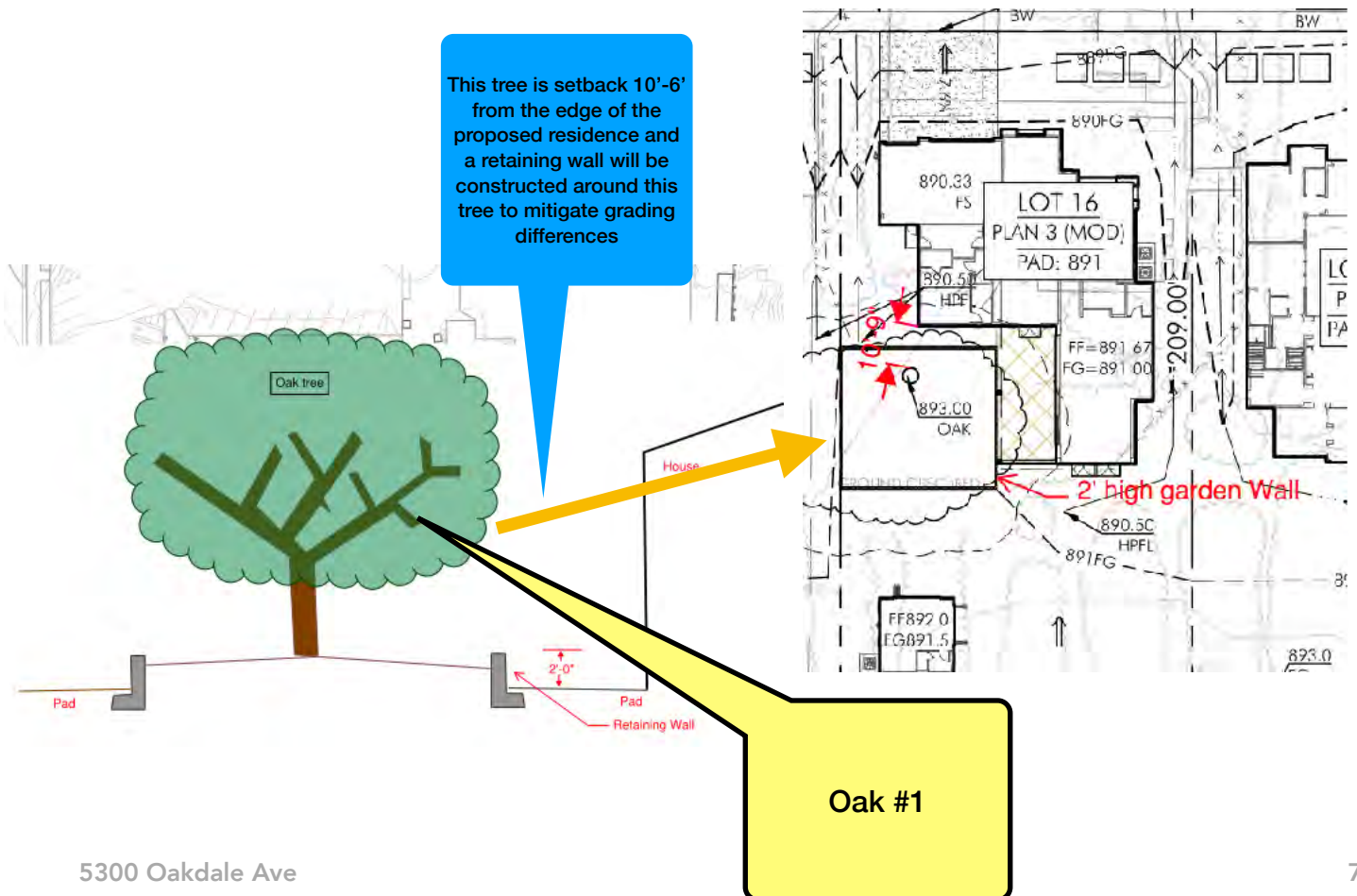
See Appendix A.1 Tree Location Map on page 6 for tree locations.

PROTECTED TREES #2 & #3

There are 2 oaks within the open area of this dedicated preserved land area and oaks flanking the perimeter. Protected oak trees #2 and #3 are outside of the construction zone, will receive no impact and will be retained and protected in place. See Appendix A.1 Tree Location Map on page 6 for tree locations.

OFF SITE PROTECTED TREES

Off-Site Oak tree #OS4 - #OS8 are outside of the construction zone and will be retained and protected in place. Four of these trees are offsite on the dedicated parcel/land where no construction will occur. Oak #OS9 on neighboring property is setback from the proposed construction. Any work performed nearby will assess the roots and modify any soil work prior to ensure reduced impact.



IMPACT ANALYSIS AND SPECIFIC RECOMMENDATIONS

STREET TREES

There are (19) nineteen Street *Washingtonia robusta* fan palms located in the ROW and are considered Parkway Street Trees.

City conditions require road widening of Oakdale Avenue and Collier Street to LADOT standards and construction of ingress/egress for this new housing development.

Two (2) Mexican Fan palms will need to be removed for the proper driveway opening at the westerly project entry along Oakdale Avenue. Additionally, another two (2) Mexican Fan Palms at the intersection of Collier Street and Oakdale Avenue will need to be removed to make way for the required road widening. This will be a total of four (4) Fan Palms to be removed for the road widening and installation of the entrance road/driveway.

The remaining 15 street palms will receive root pruning and will be minimally impacted by the road widening. Palms can handle root pruning in close proximity. These palms will be retained and protected in place. City Department of Engineering was contacted, and they have agreed to reduce the required pavement section along Oakdale Avenue enough to preserve the remaining palm trees.

Aerial View of Property- Shows locations of street trees



IMPACT ANALYSIS AND SPECIFIC RECOMMENDATIONS

AGRICULTURAL CITRUS GROVE

SUMMARY: This property contains an orchard of 1,451 citrus trees. Approximately 1,143 trees in the north and south groves are recommended for removal due to construction impact and their beyond-redemption condition. 251 trees on the preserved area behind train station, including the terrace area. Also, 57 trees will be retained and replanted along Oakdale Avenue. Replanting of some of the trees is necessary to complete the city ROW to city standards.

These remaining trees are in variable condition and will require regular active maintenance including adequate irrigation, fertilizers, pruning, weed and pest control to survive and be productive.

HISTORY OF SITE & CURRENT CONDITION REPORT BY CITRUS EXPERT DAVID MATIAS: Previously, the land was an agricultural orchard for growing, harvesting and selling citrus. Years of drought, poor irrigation and lack of maintenance took their toll and now the majority of this orchard is in major decline. These aged trees are both distressed and declining according to Dave Matias' report evaluating the citrus trees, dated March 14, 2022. See report in Appendix E, pages 45 - 52.

Mr. Matias goes on to note that these trees suffered many years of under-watering. The resulting damage is unlikely to be ameliorated in California's current water restrictive climate and, even if provided ample water, the orchard could not overcome years of neglect to return to its former state.

Substantial leaf loss, wilt and (branch) die-back indicates that these trees have been under watered for years. Once citrus is allowed to dry out, restoring water normally will not restore the tree to its original healthy state.

The trees are declining and in senescence (death spiral) and although they may have leaves and some fruit, it does not denote any meaningful potential for overcoming their age and natural lifespan of citrus trees in the most optimal conditions.

Dave Matias analysis was performed prior to 2022 summer's extended mega-drought, and will most certainly push most of these citrus trees into a "severe stress" condition.

AGRICULTURAL TREES not NON-PROTECTED SIGNIFICANT TREES: The agricultural citrus trees in this case do not meet the criteria for a typical, non-protected significant tree. A non-protected significant tree is an amenity tree that provides shade and canopy in an urban setting. Here, they are neither amenity nor shade canopy trees, but rather agricultural trees.

From a tree canopy standpoint, the existing trees have no desirable or significant quality, especially as compared to broad evergreen or broad deciduous trees. A shade tree can be defined as a tree that exceeds 25 feet in height at maturity, requires little maintenance and is drought tolerant. For all the foregoing reasons, these citrus trees meet neither the criteria for a typical amenity tree nor a shade tree. Thus, the 1:1 replacement requirement for non-protected, significant trees does not apply in this case.

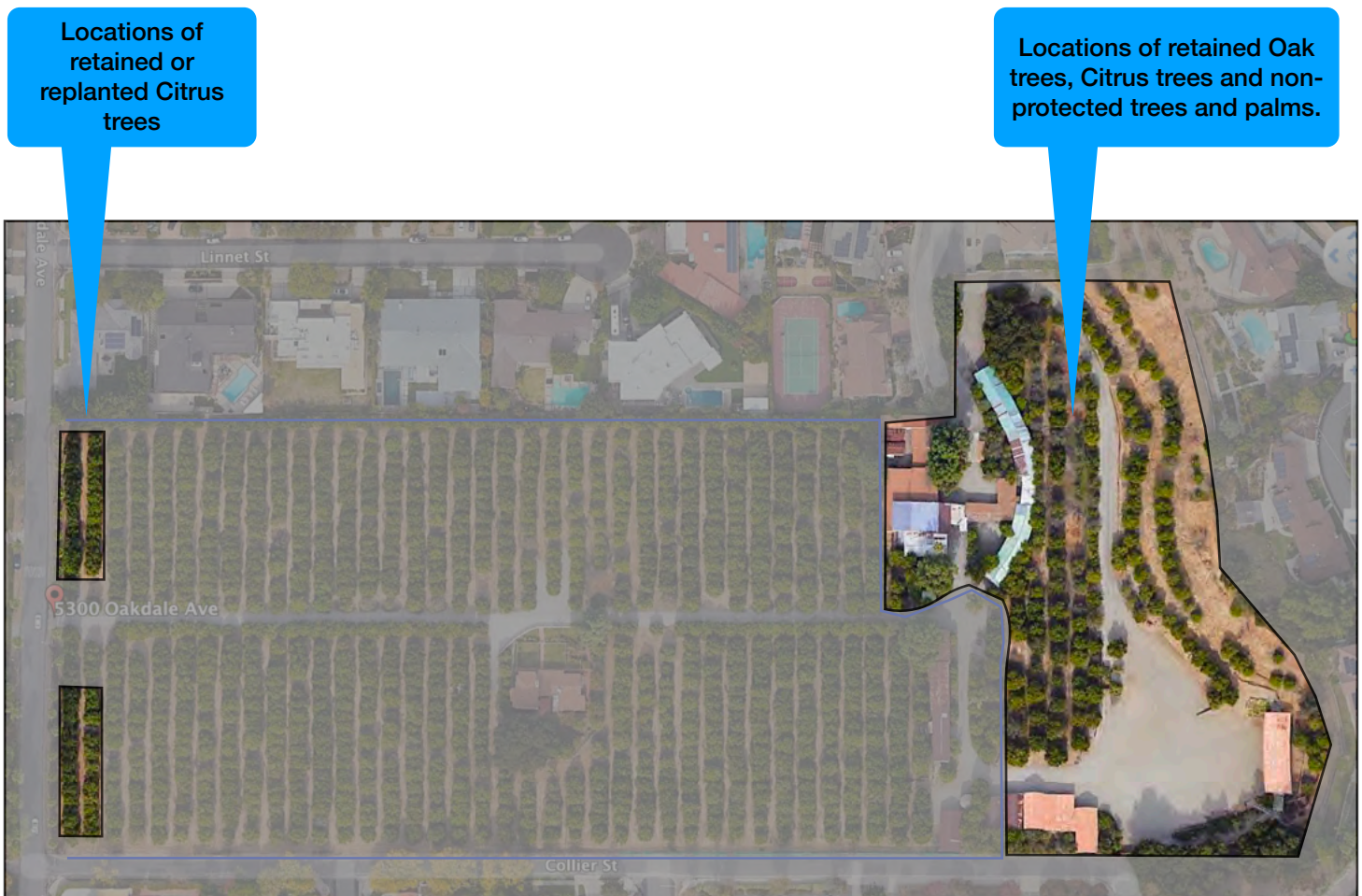
In place of the dying orchard, twenty-one homes will be built and new trees will be planted. In fact, included in this project is a landscape plan which will incorporate a robust collection of new trees. Please see provided landscaping plan on page 9 of this report.

IMPACT ANALYSIS AND SPECIFIC RECOMMENDATIONS

NON-PROTECTED TREES 8" or greater

There is a low quantity of non-protected trees. These consist of seven canary pines and two queen palm trees. Canary pine trees #5, #10 and #11 will be impacted by construction and are recommended for removal. Six other trees will be retained and protected in place.

RETAINED CITRUS and OAKS - Aerial View of Property- Shows locations of retained citrus and oak trees and retained non-protected significant trees in NON developed areas.



GENERAL RECOMMENDATIONS

During the course of construction, trees can receive much stress, pollution, soil compaction and lack of water. The following general recommendations should be followed to establish and maintain a healthy environment for all retained trees.

WORKING IN THE TREE PROTECTION ZONE

This area generally encompasses an area within the dripline of the tree plus additional feet depending on the species and size of the tree. However, if you should need to encroach within a tree's protected zone, please follow these guidelines.

Observation – All work within the protected zone should be observed by a certified arborist experienced with each specific tree's requirements. The arborist should be contacted in a timely manner to ensure their availability.

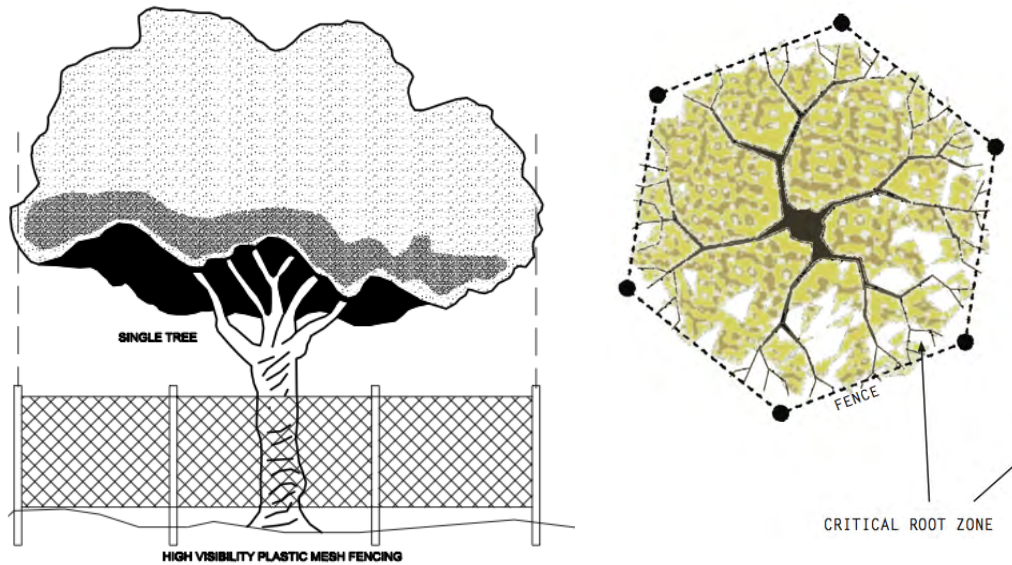
Hand Tools – All work should be performed utilizing hand tools only. To reduce compaction in the root zone, no large equipment, such as backhoes or tractors should be utilized in this protected zone.

Root Pruning - Should there be a need to perform any light root pruning, it should be done carefully. The roots should be exposed through hand digging. **The roots should be cut at a 90-degree angle and cut cleanly.** No roots should be torn or jagged; this can lead to rotting and decay in the root zone and reduced stability and health in the tree. I caution excessive root pruning, and encourage you to err on the conservative side. If a tree is in any existing stress or is lacking in health and vigor, the root pruning can contribute to the quick decline of a tree.

Protective Fencing – If necessary, the arborist should be contacted to develop a specific fencing plan for your trees. Fencing may be of a flexible configuration and be a minimum of 4 feet in height. A warning sign must be displayed on the street side of the fence, stating the requirements of all workers in the protected zone. Throughout the course of construction, maintain the integrity of the tree protection zone fencing and keep the site clean and maintained at all times.

Irrigation – Irrigate trees for the duration of the project. If the tree is newly planted, deep watering should be weekly during its establishment period. If the tree is quite mature, deep water once per month during spring and summer months.

PROTECTIVE FENCING



Tree protection fencing must be installed at the edge of the Tree Protection Zone (critical root zone) or beyond **prior to the start of any clearing, grading or other construction activity**. If space limits the fencing, place at the furthest possible distance from the trunk.

- 1) Fencing may be of a **flexible configuration or chain-link** and be a minimum of 4 feet in height supported by vertical posts at a maximum of ten-foot intervals to keep the fence upright and in place.
- 2) A warning sign should be posted on the fencing which states, **“Warning: Tree Protection Zone”** and stating the requirements of all workers in the protected zone. Example available upon request.
- 3) Throughout the course of construction, **maintain the integrity of the tree protection zone fencing and keep the site clean and maintained at all times**. No construction staging or disposal of construction materials or byproducts including but not limited to paint, plaster, or chemical solutions is allowed in the Tree Protection Zone.

PLANTING WITHIN THE PROTECTED ZONE

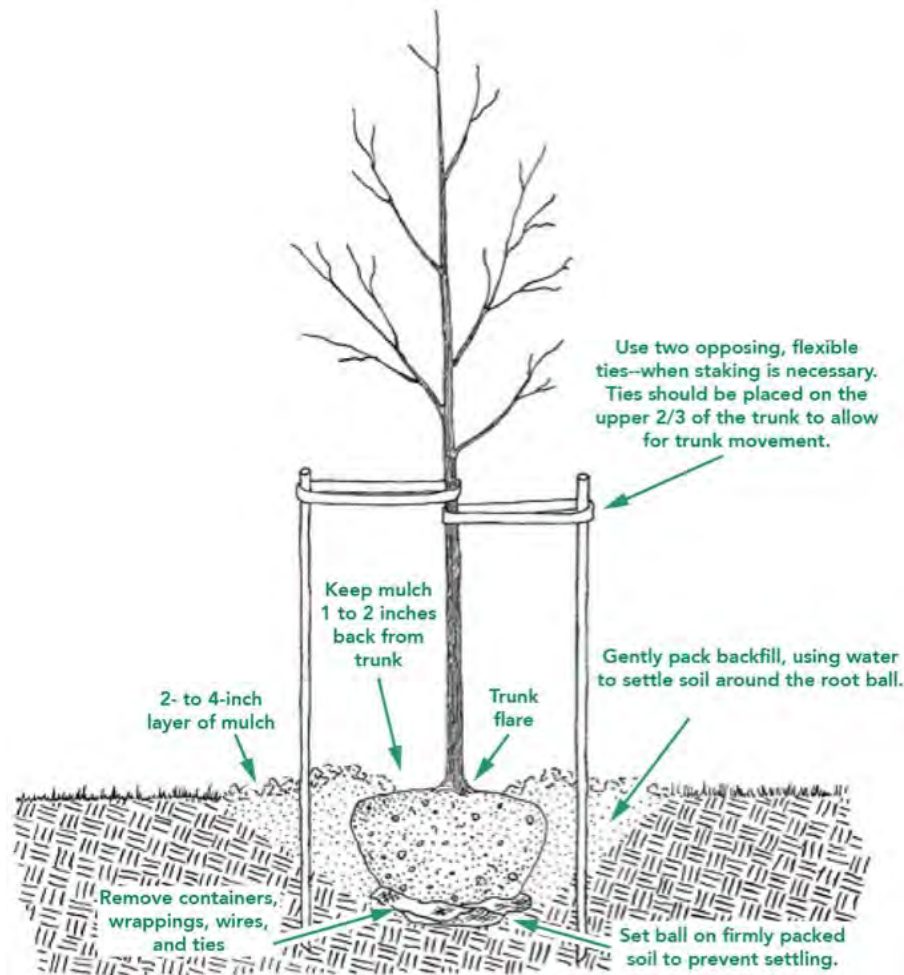
Trees remain healthier and vigorous with NO plantings within the protected zone. The natural leaf litter that the tree provides should be allowed to remain on the ground, to provide natural mulch and nutrients. If planting is desired, please follow these recommendations:

Plant Selection – Only drought tolerant plants that are compatible with the specific trees should be selected. Most importantly, select plants that are resistant to *Armillaria* or *Phytophthora*. Some trees are particularly susceptible to these diseases in urban areas and when under construction stress. Please refer to local guides for acceptable plant recommendations

Irrigation – Water should not be spraying toward the base of the trunk or tree; this can encourage rotting of the root crown. Excessive moisture on the base of the trunk can encourage *Armillaria mellea* (Oak Root Fungus) or *Phytophthora cinnamomi* (Avocado Root rot). Both of these fungus' can reduce the health and vigor of the tree, thus leading to decline and potential failure of the tree (falling over). It is recommended to only provide irrigation to the roots in the warmer months of spring and early summer, thus extending the natural rainy season. This irrigation should be provided via soaker hoses that do not spray upward.

Mulch - Apply a light layer of organic mulch over the root zone (approx. 3- 4 inches thick). The mulch will reduce loss of moisture from the soil, protect against construction compaction, and moderate soil temperatures. It also has been demonstrated that the addition of mulch reduces soil compaction over time. Do not place mulch against the trunk, instead placing at least 3 inches from base.

NEW TREE PLANTING



The ideal time to plant trees and shrubs is during the dormant season, in the fall after leaf drop or early spring before budbreak. Weather conditions are cool and allow plants to establish roots in the new location before spring rains and summer heat stimulate new top growth. Before you begin planting your tree, be sure you have had all underground utilities located prior to digging.

If the tree you are planting is balled or bare root, it is important to understand that its root system has been reduced by 90 to 95 percent of its original size during transplanting. As a result of the trauma caused by the digging process, trees commonly exhibit what is known as transplant shock. Containerized trees may also experience transplant shock, particularly if they have circling roots that must be cut. Transplant shock is indicated by slow growth and reduced vigor following transplanting. Proper site preparation before and during planting coupled with good follow-up care reduces the amount of time the plant experiences transplant shock and allows the tree to quickly establish in its new location. Carefully follow nine simple steps, and you can significantly reduce the stress placed on the plant at the time of planting.

NEW TREE PLANTING, continued

- 1. Dig a shallow, broad planting hole.** Make the hole wide, as much as three times the diameter of the root ball but only as deep as the root ball. It is important to make the hole wide because the roots on the newly establishing tree must push through surrounding soil in order to establish. On most planting sites in new developments, the existing soils have been compacted and are unsuitable for healthy root growth. Breaking up the soil in a large area around the tree provides the newly emerging roots room to expand into loose soil to hasten establishment.
- 2. Identify the trunk flare.** The trunk flare is where the roots spread at the base of the tree. This point should be partially visible after the tree has been planted (see diagram). If the trunk flare is not partially visible, you may have to remove some soil from the top of the root ball. Find it so you can determine how deep the hole needs for proper planting.
- 3. Remove tree container for containerized trees.** Carefully cutting down the sides of the container may make this easier. Inspect the root ball for circling roots and cut or remove them. Expose the trunk flare, if necessary.
- 4. Place the tree at the proper height.** Before placing the tree in the hole, check to see that the hole has been dug to the proper depth and no more. The majority of the roots on the newly planted tree will develop in the top 12 inches of soil. If the tree is planted too deeply, new roots will have difficulty developing because of a lack of oxygen. It is better to plant the tree a little high, 1-2 inches above the base of the trunk flare, than to plant it at or below the original growing level. This planting level will allow for some settling.
- 5. Straighten the tree in the hole.** Before you begin backfilling, have someone view the tree from several directions to confirm that the tree is straight. Once you begin backfilling, it is difficult to reposition the tree.
- 6. Fill the hole gently but firmly.** Fill the hole about one-third full and gently but firmly pack the soil around the base of the root ball. Be careful not to damage the trunk or roots in the process. Fill the remainder of the hole, taking care to firmly pack soil to eliminate air pockets that may cause roots to dry out. To avoid this problem, add the soil a few inches at a time and settle with water. Continue this process until the hole is filled and the tree is firmly planted. It is not recommended to apply fertilizer at time of planting.
- 7. Stake the tree, if necessary.** If the tree is grown properly at the nursery, staking for support will not be necessary in most home landscape situations. Studies have shown that trees establish more quickly and develop stronger trunk and root systems if they are not staked at the time of planting. However, protective staking may be required on sites where lawn mower damage, vandalism, or windy conditions are concerns. If staking is necessary for support, there are three methods to choose among: staking, guying, and ball stabilizing. One of the most common methods is staking. With this method, two stakes used in conjunction with a wide, flexible tie material on the lower half of the tree will hold the tree upright, provide flexibility, and minimize injury to the trunk (see diagram). Remove support staking and ties after the first year of growth.
- 8. Mulch the base of the tree.** Mulch is simply organic matter applied to the area at the base of the tree. It acts as a blanket to hold moisture, it moderates soil temperature extremes, and it reduces competition from grass and weeds. A 2- to 3-inch layer is ideal. More than 3 inches may cause a problem with oxygen and moisture levels. When placing mulch, be sure that the actual trunk of the tree is not covered. Doing so may cause decay of the living bark at the base of the tree. A mulch-free area, 1 to 2 inches wide at the base of the tree, is sufficient to avoid moist bark conditions and prevent decay.

TREE MAINTENANCE AND PRUNING

Some trees do not generally require pruning. The occasional removal of dead twigs or wood is typical. Occasionally a tree has a defect or structural condition that would benefit from pruning. Any pruning activity should be performed under the guidance of a certified arborist or tree expert.

Because each cut has the potential to change the growth of the tree, no branch should be removed without a reason. Common reasons for pruning are to remove dead branches, to remove crowded or rubbing limbs, and to eliminate hazards. Trees may also be pruned to increase light and air penetration to the inside of the tree's crown or to the landscape below. In most cases, mature trees are pruned as a corrective or preventive measure.

Routine thinning does not necessarily improve the health of a tree. Trees produce a dense crown of leaves to manufacture the sugar used as energy for growth and development. Removal of foliage through pruning can reduce growth and stored energy reserves. Heavy pruning can be a significant health stress for the tree.

Yet if people and trees are to coexist in an urban or suburban environment, then we sometimes have to modify the trees. City environments do not mimic natural forest conditions. Safety is a major concern. Also, we want trees to complement other landscape plantings and lawns. Proper pruning, with an understanding of tree biology, can maintain good tree health and structure while enhancing the aesthetic and economic values of our landscapes.

Pruning Techniques – From the I.S.A. Guideline

Specific types of pruning may be necessary to maintain a mature tree in a healthy, safe, and attractive condition.

Cleaning is the removal of dead, dying, diseased, crowded, weakly attached, and low- vigor branches from the crown of a tree.

Thinning is the selective removal of branches to increase light penetration and air movement through the crown. Thinning opens the foliage of a tree, reduces weight on heavy limbs, and helps retain the tree's natural shape.

Raising removes the lower branches from a tree to provide clearance for buildings, vehicles, pedestrians, and vistas.

Reduction reduces the size of a tree, often for clearance for utility lines. Reducing the height or spread of a tree is best accomplished by pruning back the leaders and branch terminals to lateral branches that are large enough to assume the terminal roles (at least one-third the diameter of the cut stem). Compared to topping, reduction helps maintain the form and structural integrity of the tree.

TREE MAINTENANCE AND PRUNING, continued

How Much Should Be Pruned?

Mature trees should require little routine pruning. A widely accepted rule of thumb is never to remove more than one-quarter of a tree's leaf-bearing crown. In a mature tree, pruning even that much could have negative effects. Removing even a single, large-diameter limb can create a wound that the tree may not be able to close. The older and larger a tree becomes, the less energy it has in reserve to close wounds and defend against decay or insect attack. Pruning of mature trees is usually limited to removal of dead or potentially hazardous limbs.

Wound Dressings

Wound dressings were once thought to accelerate wound closure, protect against insects and diseases, and reduce decay. However, research has shown that dressings do not reduce decay or speed closure and rarely prevent insect or disease infestations. Most experts recommend that wound dressings not be used.

DISEASES AND INSECTS

Continual observation and monitoring of your tree can alert you to any abnormal changes. Some indicators are: excessive leaf drop, leaf discoloration, sap oozing from the trunk and bark with unusual cracks. Should you observe any changes, you should contact a Tree specialist or Certified Arborist to review the tree and provide specific recommendations. Trees are susceptible to hundreds of pests, many of which are typical and may not cause enough harm to warrant the use of chemicals. However, diseases and insects may be indication of further stress that should be identified by a professional.

GRADE CHANGES

The growing conditions and soil level of trees are subject to detrimental stress should they be changed during the course of construction. Raising the grade at the base of a tree trunk can have long-term negative consequences. This grade level should be maintained throughout the protected zone. This will also help in maintaining the drainage in which the tree has become accustomed.

INSPECTION

The property owner should establish an inspection calendar based on the recommendation provided by the tree specialist. This calendar of inspections can be determined based on several factors: the maturity of the tree, location of tree in proximity to high-use areas vs. low-use area, history of the tree, prior failures, external factors (such as construction activity) and the perceived value of the tree to the homeowner.

Assumptions and Limiting Conditions

No warranty is made, expressed or implied, that problems or deficiencies of the trees or the property will not occur in the future, from any cause. The Consultant shall not be responsible for damages or injuries caused by any tree defects, and assumes no responsibility for the correction of defects or tree related problems.

The owner of the trees may choose to accept or disregard the recommendations of the Consultant, or seek additional advice to determine if a tree meets the owner's risk abatement standards.

The Consulting Arborist has no past, present or future interest in the removal or retaining of any tree. Opinions contained herein are the independent and objective judgments of the consultant relating to circumstances and observations made on the subject site.

The recommendations contained in this report are the opinions of the Consulting Arborist at the time of inspection. These opinions are based on the knowledge, experience, and education of the Consultant. The field inspection was a visual, grade level tree assessment.

The Consulting Arborist shall not be required to give testimony, perform site monitoring, provide further documentation, be deposed, or to attend any meeting without subsequent contractual arrangements for this additional employment, including payment of additional fees for such services as described by the Consultant.

The Consultant assumes no responsibility for verification of ownership or locations of property lines, or for results of any actions or recommendations based on inaccurate information.

This Arborist report may not be reproduced without the express permission of the Consulting Arborist and the client to whom the report was issued. Any change or alteration to this report invalidates the entire report.

Should you have any further questions regarding this property, please contact me at (310) 663-2290.

Respectfully submitted,

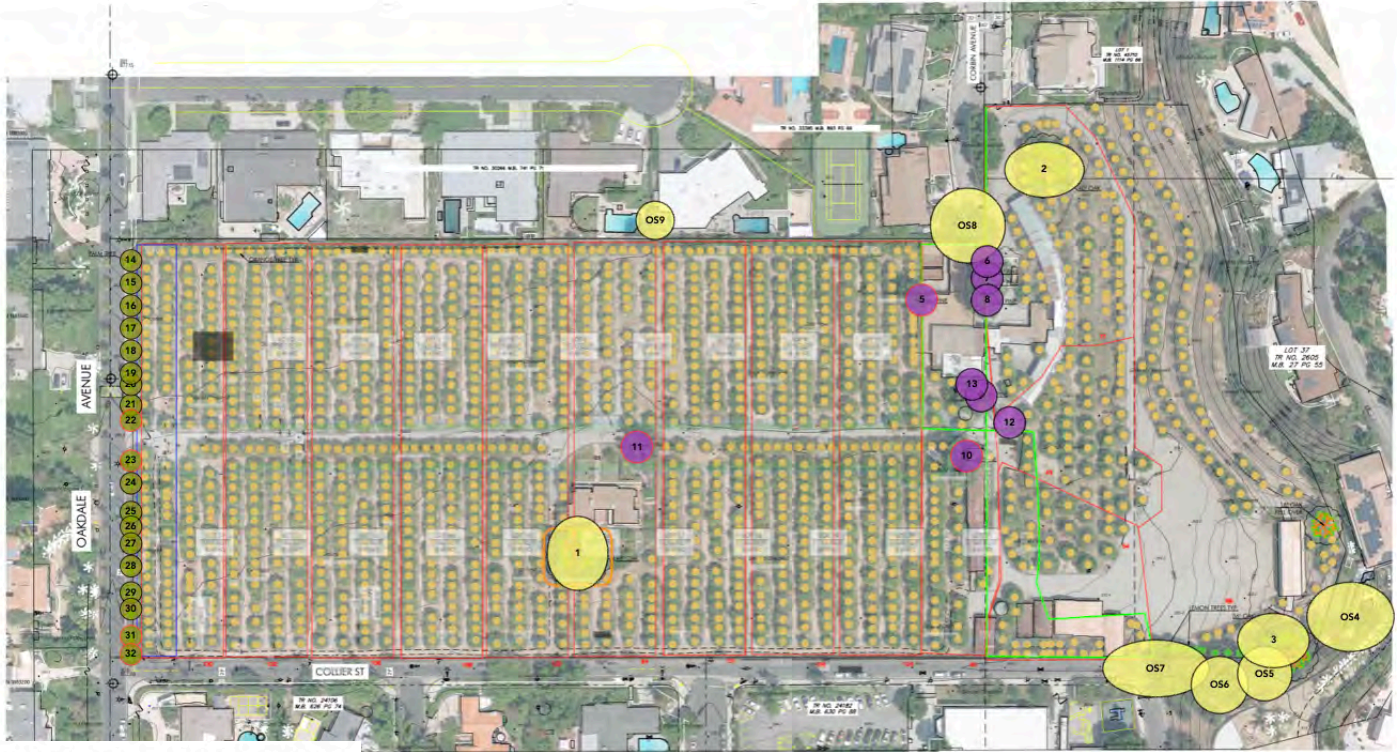


Lisa Smith

Registered Consulting Arborist #464
ISA Board Certified Master Arborist #WE3782B
ISA Tree Risk Assessor Qualified- Instructor
American Society of Consulting Arborists, Member



APPENDIX A.1 - TREE LOCATION - SURVEY MAP, REDUCED



Appendix A.1: Tree Locations on Project Survey

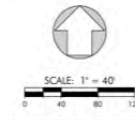
TREE LOCATION EXHIBIT

PROJECT SUMMARY	
Site Address	5300 Oakdale Ave
Location and/or Specific Plan	Woodland Hills
Project Description	21 New Single Family Homes
Proposed Floor Area - Lot Size (FAR)	X SF x SF
Number of Protected Trees on Site	3
Number of Recommended Removals	0

BOTHWELL RANCH
5300 OAKDALE AVE
TARZANA, CA 91356

A.P.N.: 2164-008-001, 2164-008-005
2164-008-006 & 2164-008-007

KEY	
	Protected Native Oak Tree
	Non-Protected Tree
	Agricultural Citrus Grove
	Street Tree
	Protective Fencing
	Tree For Removal



September 21, 2022

PREPARED BY:
PACIFIC COAST CIVIL, INC.
38141 AGOURA ROAD, SUITE 200
WOODLAND HILLS, CA 91367
TEL: (818) 888-8188
FAX: (818) 888-8188

OWNER:
BORNSTEIN ENTERPRISES
11166 WILSHIRE BLVD., SUITE 820
LOS ANGELES, CA
90024

SHEET: 1 OF 1

SUMMARY OF FIELD INSPECTION					
Tree #	Species	Status	DBH (")	Condition	Retain or Remove
1	Coast Live Oak <i>Quercus agrifolia</i>	Protected	48	Fair	Retain
2	Coast Live Oak <i>Quercus agrifolia</i>	Protected	33.5	Fair	Retain
3	Coast Live Oak <i>Quercus agrifolia</i>	Protected	36	Fair	Retain
5	Canary Pine <i>Pinus canariensis</i>	Non-Protected	36	Fair	REMOVE
6	Canary Pine <i>Pinus canariensis</i>	Non-Protected	34	Fair	Retain
7	Canary Pine <i>Pinus canariensis</i>	Non-Protected	32	Fair	Retain
8	Canary Pine <i>Pinus canariensis</i>	Non-Protected	38	Fair	Retain
9	Canary Pine <i>Pinus canariensis</i>	Non-Protected	30	Fair	Retain
10	Canary Pine <i>Pinus canariensis</i>	Non-Protected	30	Fair	REMOVE
11	Canary Pine <i>Pinus canariensis</i>	Non-Protected	30	Fair	REMOVE
12	Queen Palm <i>Spathoglauco fimbriata</i>	Non-Protected	18	Fair	Retain
13	Queen Palm <i>Spathoglauco fimbriata</i>	Non-Protected	18	Fair	Retain
14-32	California Fan Palm <i>Washingtonia filifera</i>	Street	22	Fair	4 removals
33	Citrus <i>Citrus sp.</i>	Agricultural Citrus Grove	6" - 8"	Poor-very Poor	REMOVE
OS4	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	12	C	Retain
OS5	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	20, 20	C	Retain
OS6	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	24	C	Retain
OS7	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	36	C	Retain
OS8	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	24	C	Retain
OS9	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	15	D	Retain

TREE COUNT

Citrus Trees: 1,451

Palm Trees on Oakdale: 15 of 19 preserved

Palm Trees Preserved Parcel east: 2 preserved

Large Pines: 4 of 7 preserved

Oak Trees: 3 - 2 of which are on preserved east parcel and one preserved on western parcel

Total preserved in place and replanted citrus: 308 trees

Native trees in Preserve (to be donated in donation agreement): 50



PROJECT SUMMARY	
Site Address	5300 Oakdale Ave
Location and/or Specific Plan	Woodland Hills
Project Description	21 New Single Family Homes
Proposed Floor Area - Lot Size (FAR)	X SF : x SF
Number of Protected Trees on Site	3
Number of Recommended Removals	0

KEY	
	Protected Native Oak Tree
	Non-Protected Tree
	Remaining Agricultural Citrus Grove
	Street Tree
	Protective Fencing
	Tree For Removal

SUMMARY OF FIELD INSPECTION						
Tree #	Species	Status	DBH (")	Condition	Retain or Remove	
1	Coast Live Oak <i>Quercus agrifolia</i>	Protected	48	Fair	Retain	
2	Coast Live Oak <i>Quercus agrifolia</i>	Protected	33.5	Fair	Retain	
3	Coast Live Oak <i>Quercus agrifolia</i>	Protected	36	Fair	Retain	
5	Canary Pine <i>Pinus canariensis</i>	Non-Protected	36	Fair	REMOVE	
6	Canary Pine <i>Pinus canariensis</i>	Non-Protected	34	Fair	Retain	
7	Canary Pine <i>Pinus canariensis</i>	Non-Protected	32	Fair	Retain	
8	Canary Pine <i>Pinus canariensis</i>	Non-Protected	38	Fair	Retain	
9	Canary Pine <i>Pinus canariensis</i>	Non-Protected	30	Fair	Retain	
10	Canary Pine <i>Pinus canariensis</i>	Non-Protected	30	Fair	REMOVE	
11	Canary Pine <i>Pinus canariensis</i>	Non-Protected	30	Fair	REMOVE	
12	Queen Palm <i>Syagrus romanzoffiana</i>	Non-Protected	18	Fair	Retain	
13	Queen Palm <i>Syagrus romanzoffiana</i>	Non-Protected	18	Fair	Retain	
14-32	California Fan Palm <i>Washingtonia filifera</i>	Street	22	Fair	4 removals	
33	Citrus <i>Citrus sp</i>	Agricultural Citrus Grove	6" - 8"	Poor-very Poor	REMOVE	
OS4	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	12	C	Retain	
OS5	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	20, 20	C	Retain	
OS6	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	24	C	Retain	
OS7	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	36	C	Retain	
OS8	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	24	C	Retain	
OS9	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	15	D	Retain	

TREE COUNT

TREE COUNT

- Citrus Trees: 1,451
- Palm Trees on Oakdale: 15 of 19 preserved
- Palm Trees Preserved Parcel east: 2 preserved
- Large Pines: 4 of 7 preserved
- Oak Trees: 3 - 2 of which are on preserved east parcel and one preserved on western parcel

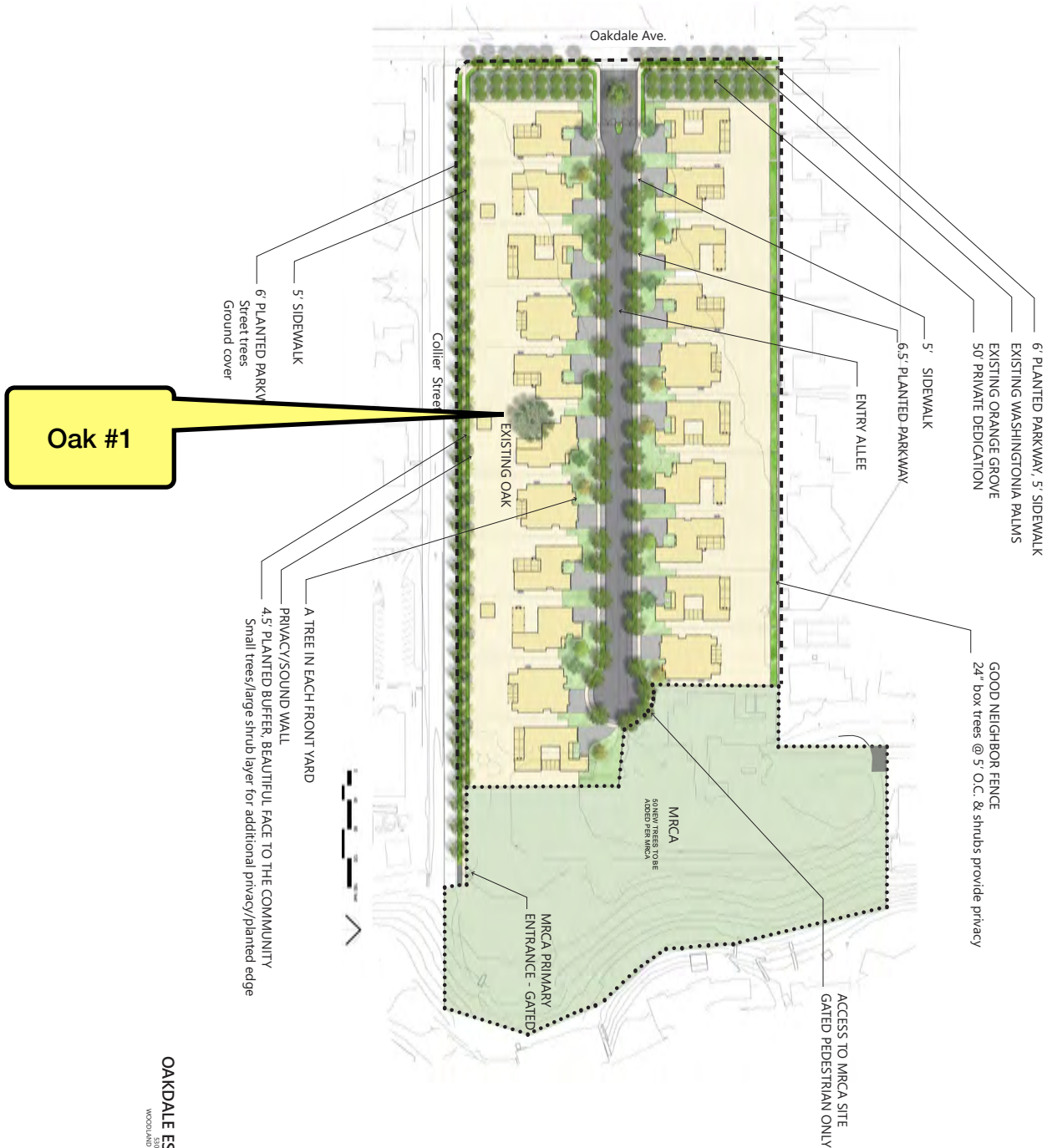
Total preserved in place and replanted citrus: 308 trees

Native trees in Preserve (to be donated in donation agreement): 50

APPENDIX A.3 - TREE REPLACEMENT MAP, Landscaping PLAN REDUCED

ILLUSTRATIVE SCHEMATIC LANDSCAPE PLAN

Toller Meyer Associates, Inc.
 Landscape Architecture & Planning - Urban Design
 10000 Wilshire Blvd., Suite 1000
 Beverly Hills, CA 90210-3221
 (310) 276-9100 | www.tollermeier.com



OAKDALE ESTATES
 WOODLAND HILLS, CA 91364
 01/2023

APPENDIX A.4 - TREE REPLACEMENT MAP, Landscaping PLAN REDUCED

PRELIMINARY TREE PLANTING PLAN Selected

TREE COUNT		
CENTER ALLEE	40	36" box Ulmus parvifolia, plant per plan
COLLIER AVE Parkway Inboard buffer	35	36" box Platanus racemosa, 30' O.C.
	31	36" box Chitalpa tashkentensis or equal, 30' O.C. offset from sycamores for privacy wall
ENTRY SPECIMEN	1	60" box Olea Europea 'Swan Hill' multi trunk
NORTH PRIVACY EDGE	150	24" box Podocarpus gracilior or equal, planted 5' O.C.
FRONT YARD TREES	21	Minimum 24" box, various species that complement plant palette
TOTAL PROPOSED TREES	278	
EXISTING		
Washingtonia palms		
Oak		
Oakdale Orange grove, 2 rows		

NEIGHBOR PRIVACY



Laurus nobilis



Podocarpus gracilior - tree or hedge
Fern Pine



Eleoacarpus decipiens
Japanese Blueberry Tree

ENTRY ALLEE



Ulmus parvifolia
True Green/Drake Elm
Rounded canopy, evergreen



Entry Gate Specimen Olive

Oak #1



ENTRY GATE SPECIMEN



Olea europea 'Swan Hill'
Fruitless Olive
Evergreen multi-trunk

COLLIER PRIVACY



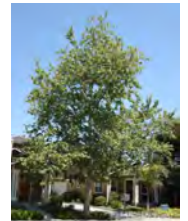
Rhus integrifolia
Lemonadeberry
Native



Heteromeles arbutifolia
Toyon
Native



Chitalpa tashkentensis 'Pink Dawn'
Pink Dawn Chitalpa
Airy structure, ornamental form/flower, deciduous



Platanus racemosa
California sycamore
Deciduous

12

APPENDIX B - PHOTOGRAPHS



PHOTO 1 - There are (19) nineteen Street Washingtonia robusta fan palms located in the ROW and considered Parkway Street Trees. City plans require road widening of Collier Street and construction of ingress/egress for this new housing development. City Department of Engineering was contacted, and they have agreed to reduce the required pavement section along Oakdale Avenue enough to preserve the remaining palm trees. Only 4 of the Mexican Fan palms will need to be removed along the east side of Oakdale Avenue. The remaining 15 street palms will receive root pruning and will be minimally impacted by the road widening. These palms will be retained and protected in place.

5300 Oakdale Ave

APPENDIX B - PHOTOGRAPHS



PHOTO 2 - Oak tree #1 is setback 10' - 6" from construction and will receive minimal impact. This tree will be retained and protected in place per the design, in Lot 16.

APPENDIX B - PHOTOGRAPHS



PHOTO 3 - Oak tree #1 is setback 10' 6" from construction and will receive minimal impact. This tree will be retained and protected in place per the design, in Lot 16.

APPENDIX B - PHOTOGRAPHS



PHOTO 4 - Protected Oak #2 oak is in the preserved land area and outside of the construction zone, will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 5 - Protected Oak #2 oak is in the preserved land area and outside of the construction zone, will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 6 - Protected Oak #3 oak is in the preserved land area and outside of the construction zone, will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 7 - Protected Oak #3 oak is in the preserved land area and outside of the construction zone, will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 8 - Protected oak tree OFF-SITE is outside of the construction zone, will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 9 - Protected OFF-SITE Oak #OS5 is outside of the adjacent preserved land where no construction will occur. It will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 10 - Protected OFF-SITE Oak #OS5 is outside of the construction zone, will receive no impact and will be retained and protected in place. In fact, this tree is offsite adjacent to the preserved land where no construction will occur.

APPENDIX B - PHOTOGRAPHS



PHOTO 11 - Protected OFF-SITE Oak #OS5 & OS6 are outside of the adjacent preserved land where no construction will occur. They will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 12 - Protected OFF-SITE Oak #OS7 is outside of the adjacent preserved land where no construction will occur. It will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 13 - Non-Protected canary pine. This tree will be impacted by the proposed construction and will require removal.

APPENDIX B - PHOTOGRAPHS

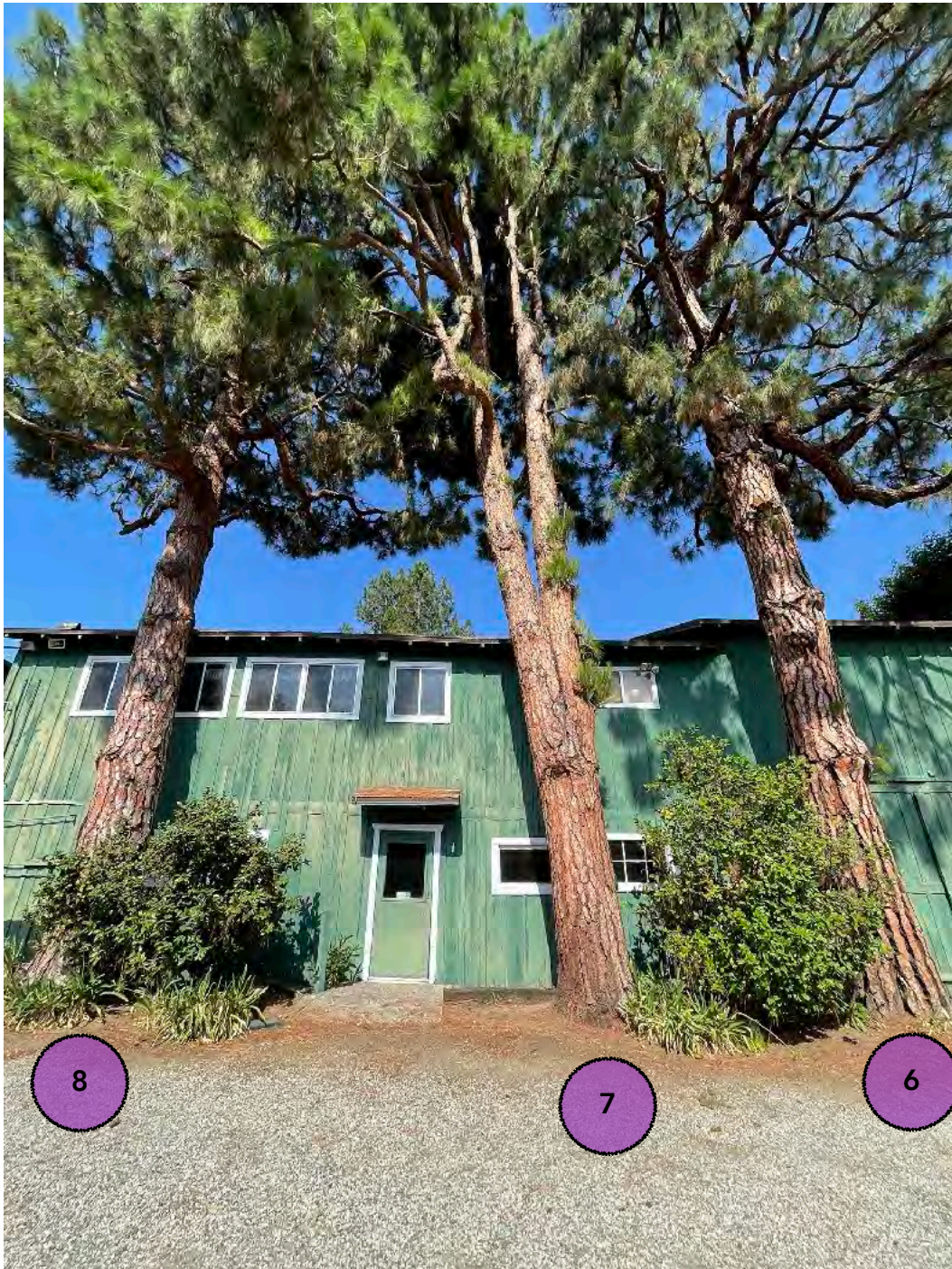


PHOTO 14 - Non-Protected canary pine - Located in the preserved area. These will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 15- Protected OFF-SITE Oak #OS8 is outside of the adjacent preserved land where no construction will occur. It will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 16 - Shows some of the agricultural citrus grove for removal.

APPENDIX B - PHOTOGRAPHS



PHOTO 17 - Shows some of the agricultural citrus grove for removal.

APPENDIX B - PHOTOGRAPHS



PHOTO 18 - Shows some of the agricultural citrus grove for removal.

APPENDIX B - PHOTOGRAPHS



PHOTO 19 - Shows protected OFF-SITE Oak #OS9 on neighboring property will receive no impact and will be retained and protected in place.

APPENDIX C - SUMMARY OF FIELD INSPECTION

Rating Code: A = Excellent, B = Good, C = Fair, D = Poor, E = Nearly Dead, F = Dead

Tree #	Species	Status	Location	DBH (")	Height (')	Spread (')	Summary of Condition	Retain or Remove
1	Coast Live Oak <i>Quercus agrifolia</i>	Protected	Lot 16 - Private Property	48	50	60	C	Retain
2	Coast Live Oak <i>Quercus agrifolia</i>	Protected	Preserved Area	33.5	40	55	C	Retain
3	Coast Live Oak <i>Quercus agrifolia</i>	Protected	Preserved Area	36	50	50	C	Retain
5	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Private Property	36	75	35	C	REMOVE
6	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Preserved Area	34	60	20	C	Retain
7	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Preserved Area	32	60	15	C	Retain
8	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Preserved Area	38	60	25	C	Retain
9	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Preserved Area	30	60	25	C	Retain
10	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Private Property	30	60	25	C	REMOVE
11	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Private Property	30	60	25	C	REMOVE
12	Queen Palm <i>Syagrus romanzoffiana</i>	Non-Protected	Preserved Area	18	45	15	C	Retain
13	Queen Palm <i>Syagrus romanzoffiana</i>	Non-Protected	Preserved Area	18	35	15	C	Retain
14	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
15	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
16	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
17	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
18	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
19	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
20	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain

APPENDIX C - SUMMARY OF FIELD INSPECTION

Rating Code: A = Excellent, B = Good, C = Fair, D = Poor, E = Nearly Dead, F = Dead

Tree #	Species	Status	Location	DBH (")	Height (')	Spread (')	Summary of Condition	Retain or Remove
21	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
22	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	REMOVE
23	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	REMOVE
24	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
25	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
26	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
27	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
28	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
29	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
30	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
31	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	REMOVE
32	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	REMOVE
33	Citrus <i>Citrus sp</i>	Agricultural Citrus Grove	Private Property	6" - 8"	15	15	D-E	1,143 Removals
OS4	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	Off-Site	12	25	15	C	Retain
OS5	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	Off-Site	20, 20	20	20	C	Retain
OS6	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	Off-Site	24	35	20	C	Retain
OS7	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	Off-Site	36	45	45	C	Retain
OS8	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	Off-Site	24	50	25	C	Retain
OS9	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	Off-Site	15	25	20	D	Retain

APPENDIX D - SUMMARY OF DATA

Table 1. Summary of Data - Total Protected Trees or Shrubs On Site

Coast Live Oak (<i>Quercus agrifolia</i>)	3
Number of Native Coast Live Oak trees to be removed	0
Number of Native Coast Live Oak trees to be minimally impacted by the construction	0
Number of Native Coast Live Oak trees not dead, to be retained, and/or where natural grade is unchanged	3
Total Protected Trees or Shrubs (DBH 4" or greater)	3
Total Protected Trees or Shrubs to be removed	0
Total Protected Trees or Shrubs to be minimally impacted	0
Total Protected Trees or Shrubs to be retained, and/or where natural grade is unchanged	3

APPENDIX D - SUMMARY OF DATA

Table 2. Schedule of Proposed Removals

Tree #	Species	Status	Condition	RECOMMENDATION	
				Retain or Remove	Reason for Removal
5	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Fair	Remove	Construction Impact
10	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Fair	Remove	Construction Impact
11	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Fair	Remove	Construction Impact
22	California Fan Palm <i>Washingtonia filifera</i>	Street	Fair	Remove	Construction Impact
23	California Fan Palm <i>Washingtonia filifera</i>	Street	Fair	Remove	Construction Impact
31	California Fan Palm <i>Washingtonia filifera</i>	Street	Fair	Remove	Construction Impact
32	California Fan Palm <i>Washingtonia filifera</i>	Street	Fair	Remove	Construction Impact
	Citrus Citrus sp (1143 removals)	Agricultural Citrus Grove	Very Poor	Remove	Construction Impact

APPENDIX D - SUMMARY OF DATA

Table 3. Summary of Replacement

	Existing Trees to Be Removed	Trees to be Planted in Replacement
PROTECTED TREES OR SHRUBS Replaced 4:1	0	0
CITY OF L.A. STREET TREES Replaced 2:1	4	8
NON-PROTECTED SIGNIFICANT TREES 8" + DBH Replaced 1:1	3	3
TOTAL	7	11

Recommended Species and Size of Replacement Trees

Non-Protected Significant Canary Island Pine tree will be replaced at a one-to-one (1:1) ratio, to the satisfaction of the City of Los Angeles Department of City Planning.

Street trees will be replaced at a two-to-one (2:1) ratio, to the satisfaction of the Urban Forestry Division.

APPENDIX E - Dave Matias Citrus Evaluation

Bothwell Citrus Ranch Evaluation

At

**5300 Oakdale Avenue
Woodland Hills CA.**

Prepared for:

**Erik Pfahler
Borstein Enterprises
11766 Wilshire Boulevard
Suite 820
Los Angeles, CA 90025**

Prepared by:

**Dave Matias
Plant and Pest Consultant
1174 Bridgeport Rd.
Corona, California 92882
(951) 212-2315**

**ASCA Registered Consulting Arborist # 476
ISA Certified Arborist WC-0463A
C-27 ST. CONT. LIC. 599831
C.D.F.A. P.C.A. 74261
C.D.F.A. Q.A.L. 98669**

March 14, 2022

APPENDIX E - Dave Matias Citrus Evaluation

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Background and summary	1
Site inspection and Discussion	1-2
Citrus culture and Conclusion	2
Site Map	3
Site Photographs	4-5
Assumptions and Limiting Conditions	6

APPENDIX E - Dave Matias Citrus Evaluation

Bothwell Ranch Citrus

page 1 of 6

Scope of work

Evaluate existing Citrus Trees in their current state at 5300 Oakdale Avenue, Woodland Hills CA.

Background and Summary

The Bothwell Ranch dates to 1926. It was part of a 30-acre citrus operation with approximately 14 acres remaining. It is primary Valencia Orange. According to the ranch manager the orchard has been operating at a loss for many years and was last harvested in 2019. Substantial leaf loss, wilt and die-back indicates that these trees have been under watered for years. The orchard is in moderate to severe stress currently. Because of water cost, it has been curtailed for years according to the ranch manager.

Water became more expensive in the mid-1980s when the Los Angeles Department of Water and Power discontinued its bargain agricultural rate for farms. This forced many growers out of business. The Bothwell Ranch has been selling its assets to maintain the orchard. Even with water curtailment the costs of water alone exceed any potential revenue. Citrus needs regular irrigation to produce volume and quality fruit. When water is curtailed, the tree can survive for some time, but fruit production ceases and tree damage can become permanent.

Site Inspection and Discussion

A site inspection was conducted on March 14, 2022, with Albelardo the current ranch manager for the past 32 years. The orchard is in moderate to severe stress currently. Several crop years still hang on few of the trees but is shrunken, very soft and easily falls from touch. Substantial leaf loss, wilt and die-back indicates that these trees have been under watered for years. Many trees probably will not survive another season without ample water. Once citrus is allowed to dry out, restoring water normally will not restore the tree to its original healthy state.

A typical commercially operated citrus grove annually requires between 2.5-to-3.5-acre feet of water per acre of grove area, which is very expensive in a metropolitan area. Drought has plagued Southern California for decades. Citrus growers relied on winter rains to supplement their irrigation needs and incorporate fertility. Winter rain would wash trees of dust, aerial pollutants, and leach sodium out of the root zone from irrigation water. The last time this orchard was irrigated was by rainfall in December 2021. The orchard historical irrigation ran on a weekly schedule for decades up to 32 hour run time during the hotter times of the year or during Santa Ana winds conditions. Currently, it gets 4 hours occasionally to prevent it from completely drying out. Albelardo was planning on giving the orchard a light irrigation within a day or so after minor irrigation repairs.

Citrus suffers when the root system is too wet or too dry. Trees must maintain even soil moisture and cannot be allowed dry out between irrigations. Drying has a negative effect on fruit set, size, quality, and eventual death. Drying or excessive wet conditions can lead to increase susceptibility to insect and disease.

Citrus bark is very thin and normally is protected from sunburn from a dense leaf canopy. You should not be able to see through a healthy citrus tree. Substantial leaf loss has occurred exposing the interior of these trees to sunlight. Exposure to the interior of a tree can lead to bark sunscald that can permanently damage or kill a limb.

The main 9.6 acres portion of the grove contains Valencia orange. It is not known what variety of Valencia or rootstock were used here. There are trees of different age and size within rows. According to the ranch manager, most of the grove was replanted approximately 36 years ago. It appears that this citrus orchard had been well taken care of in the past. It has good tree uniformity with few gaps and dead trees.

It appears that the original orchard was furrow irrigated. Parts of the original irrigation system remain but not functional. At some point the irrigation was converted to a micro irrigation system. The current system has a mixture of different size sprinklers preventing good irrigation uniformity. This creates a situation where some trees receive too much water while others not enough. Some minor irrigation damage was observed probably from coyotes looking for water.

Weed control is good at this time, which is to be expected from the lack of irrigation and rainfall. Herbicides had been used sparingly in the past but have not been used recent times. Current weed control is performed with hand tools, weed eater, or scraping with a tractor.

APPENDIX E - Dave Matias Citrus Evaluation

Bothwell Ranch Citrus

page 2 of 6

This site has been relatively insect pest free and received very little if any pest control over the years. 2019 was the last time this orchard was sprayed with an insecticide to comply with regulatory requirements to move fruit off site.

The eastern portion of the ranch approximately 4 acres is mostly flat. It has open ground that new citrus or other gardening activities can expand into. It has approximately 1.25 acres of mixed citrus and contains the oldest trees on the ranch. Valencia, navel, grapefruit, lemon, and mandarin and tangerine were observed. Many of the older trees have substantial die-back. Some of the older tree's express disease issues such as psoriasis and phytophthora and should be considered for removal. These issues and others are now prevented by using newer bud lines and rootstocks.

The current system has a mixture of different size sprinklers preventing good irrigation uniformity. This creates a situation where some trees receive too much water while others not enough. The system was turned off and its performance could not be verified. It appears this system is worn out and probably has minor leaks that would affect the entire system. There are trees that are about dead and still being irrigated.

The most easterly portion of the 4 acres has a west exposure (approximately 1.2 acres) slopes upward to existing homes. This area has several terraces, has the poorest soil conditions, and is the driest portion of the property. Because of slope drainage and sun exposure this area is difficult to irrigate and maintain moisture. The remainder of the acreage is occupied by shop building, storage sheds and a large graveled open space.

Citrus Culture and Conclusion

Citrus is a sub-tropical plant and requires a long-term commitment to work. It requires good soil, fertility, and even soil moisture to survive and be productive. Growers make a sizable investment to establish an orchard. It takes years before production to start, thus starting with the right tree is critical. It takes several years to produce a certified tree in the nursery. Growers contract with commercial citrus nurseries that certify variety, pest, and disease-free trees. Before planting growers test soil to determine the best rootstock to use in their soil and be pest free. Commercial citrus nurseries graft the desired fruit variety onto the rootstock using the same bud source. This maintains tree and fruit uniformity within the orchard. It can take five to seven years before an orchard starts producing a reasonable crop.

Citrus inputs such as water, fertilizer, pruning, and pest control have been studied for more than a century. There are many tools for the grower to use to maximize quality and production. Using weather data and soil moisture devices growers can fine tune moisture needs. Soil and leaf analysis can fine tune nutritional needs. Regular orchard scouting for pest prevent serious outbreaks. With proper care citrus can produce for over 100 years. It appears that there may be trees that date back to the time when this orchard was established.

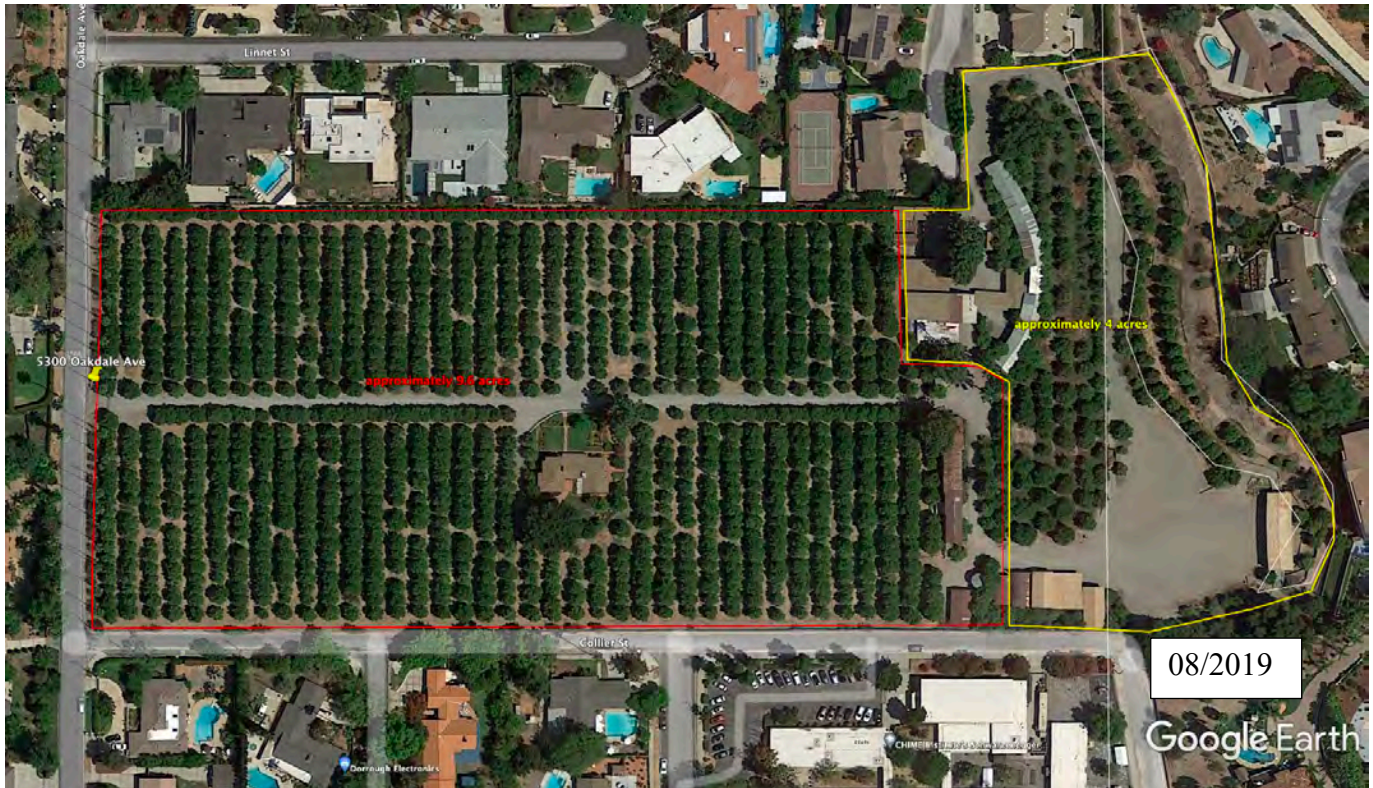
The local citrus industry infrastructure that growers relied on to get their crops harvested in Southern California disappeared when, land value, taxes, water, labor, insurance, packing facilities costs and other inputs became increasingly expensive. This site has been operating at a loss for many years.

As the farming infrastructure has disappeared in this region drastically driving up costs and coupled with high water costs and lower priced fruit from other areas, it has made it impossible for a citrus grove to be financially feasible in the Los Angeles metropolitan area.

A citrus grove requires regular active maintenance and operation to keep it healthy and productive. Unfortunately, continued lack of irrigation, fertilizers, pruning, weed and pest control will continue to stress the trees and eventually lead to death of the orchard within the next few years. Some trees in the orchard appear to be relatively healthy and may recover after several years if inputs are restored. They still may be suitable for landscaping and non-commercial fruit production if handled appropriately.

APPENDIX E - Dave Matias Citrus Evaluation

Site Map



Google Earth aerial from 2019 shows trees with dense deep green canopies. Today most trees have die-back and have lost a substantial amount of leaf cover.

APPENDIX E - Dave Matias Citrus Evaluation

Bothwell Ranch Citrus

page 4 of 6

Pictures from the western 9.6-acre portion of the ranch



Three years of crop. Note leaf drop.



View along main drive looking west toward Oakdale. Note leaf drop and die-back.

Pictures from the eastern 4 acres of the ranch



View from slope looking southwest toward shop building showing trees in various stages of decline.



View of many dead trees behind shop area.

5300 Oakdale Ave

Dave Matias Plant and Pest Consultant

March 14, 2022

APPENDIX E - Dave Matias Citrus Evaluation

Bothwell Ranch Citrus

page 5 of 6

Pictures from proposed area to be preserved.



View west toward Oakdale along main drive.



View from north-east corner looking south.



View of avocado and weeds in severe water stress. Top of slope looking north.

5300 Oakdale Ave



View of Building 9. Grounds are clean and well maintained.

APPENDIX E - Dave Matias Citrus Evaluation

Bothwell Ranch Citrus

page 6 of 6

Assumptions and Limiting Conditions

- 1 Care has been taken to obtain all information from reliable sources. All data has been verified insofar as possible; however, the arborist can neither guarantee nor be responsible for the accuracy of information provided by others.
- 2 Loss or alteration of any part of this report invalidates the entire report.
- 3 Possession of this report or copy thereof does not imply right of publication or use for any purpose by any other than the person to whom it is addressed, without the prior expressed written or verbal consent of the consulting arborist.
- 4 The consulting arborist shall not be required to give testimony or to attend court, provide additional services or attend meeting by reason of this report unless subsequent contractual arrangements are made, including payment of an additional fee for such services as described in the fee schedule and contract of engagement.
- 5 Sketches, diagrams, graph, and photographs in this report, being intended as visual aids, are not necessary to scale and should not be construed as engineering or architectural reports or surveys.
- 6 Unless expressed otherwise information contained in this report covers only those items that were examined and reflects the condition of those items at the time of inspection and the inspection is limited to visual examination of accessible items without dissection, excavation, or coring.
- 7 This inspection does not warranty or guarantee that these trees are free of defects from hidden or unapparent conditions expressed or implied. The conclusions of this report are derived from visual inspection. No samples were taken to confirm or deny the presence of disease. I hereby certify that the statements furnished above represent the data and information, and that the facts, statements, and information presented herein are true and correct to the best of my knowledge and believe.



Dave Matias
Plant and Pest Consultant

Exhibit E

February 3, 2023
J.N.: 3064.00

Mr. Erik Pfahler
Borstein Entreprises
11766 Wilshire Boulevard, Suite 820
Los Angeles, CA 90025

Subject: Assessment for Property Designation as Prime Farmland, Proposed Residential Development, 5300 Oakdale Avenue, Woodland Hills, California

Dear Mr. Pfahler,

We have prepared this correspondence to address the issue concerning the subject property designation as Prime Farmland by the Department of Conservation. Therefore, we have analyzed the site conditions using the Land Evaluation and Site Assessment (LESA) Model as provided by the California Department of Conservation, 1997 Instruction Manual (updated 2011).

Findings

The California Department of Conservation uses the LESA formula to make determinations of the potential significance of a project's conversion of agricultural lands during the Initial Study phase of the CEQA review process. Scoring thresholds are based upon both the total LESA score as well as the component Land Evaluation (LE) and Site Assessment (SA) sub-scores. In this manner, the scoring thresholds are dependent upon the attainment of a minimum score for the LE and SA sub-scores so that a single threshold is not the result of heavily skewed sub-scores (i.e., a site with a very high LE score, but a very low SA score, or vice versa). Table 9 provided in the California Department of Conservation Instruction Manual presents the LESA scoring thresholds.

The LESA model utilizes various metrics to analyze and assign a score to a property. The model is broken into two main categories designated as Land Evaluation (LE) and Site Assessment (SA). Albus and Associates has addressed the LE section while Dave Matias, the client's agriculture specialist and consulting arborist, has addressed the SA section.

The LE section is broken into two parts and they are identified as the Land Capability Classification (LCC) and the Storie Index. The LCC indicates the suitability of soils for most kinds of crops, while the Storie Index provides a numeric rating of the relative degree of suitability or value of a given soil for intensive agriculture. Each are assigned a weighting factor of 25% for a total of 50% of the overall score for the LESA model.

The LCC is currently the most widely available source of information on land quality with several resources available online to determining scores. However, the Storie Index is more subjective and qualified soil scientists are generally needed to determine an appropriate score. As such, the LESA model allows the Land Evaluation section to rely solely on the LCC score with a weighting factor of 50% of the overall LESA score. For this evaluation, we have opted to only use the LCC value for the

LE section and thereby assign the LCC a 50% weighting in the overall LESA score and no weighting to the Storie Index.

The subject site has a long history of producing oranges but over the last few decades has relied heavily on offsite water supplies to irrigate the site. We understand that as a result of the increased need to import water for irrigation at the site and the continued draught conditions in the region, the Los Angeles Department of Water and Power will no longer allow water they supply to be used for agricultural purposes at the site. A LCC rating for a site depends on whether the site is irrigated or non-irrigated. Due to the restrictions placed on the site, the site is now non-irrigated and the LCC score is based on non-irrigation. According to the USDA Natural Resources Conservation Service, Web Soil Survey (WSS), the site has three different Soil Map Units. Results of the WSS search are provided in Appendix A. The LCC Class for each zone is provided by the WSS based on the Soil Map Unit listed. The area of each of these three zones was determined as a percentage of the total property area as shown on the WSS map in Appendix A. The area of each unit, LCC for each zone, the individual LCC ratings, and the resulting LCC scores are indicated on the attached Land Evaluation Worksheet. Using the worksheet, an overall LCC score of **50.76** was calculated. By applying a weighting factor of 50%, a Land Evaluation subtotal score is **25.38**.

Dave Matias has analyzed the section related to Site Assessment as summarized below:

Site Assessment (Includes four components):

1. The Project Size Rating

The Project Size rating is based upon identifying acreage figures for three separate groupings of soil classes within the project site. The property only contains 11.8 acres of class III soils and a less significant area of 2.1 acres of class IV soil.

Score: 10

2. The Water Resources Availability Rating

The site is located in the City of Los Angeles and must use expensive domestic Municipal water for irrigation, making the cost of irrigation infeasible. Although water is available through the LADWP, the water rates are so high it makes it infeasible to use this source. Additionally, no well water is allowed or available. Furthermore, the site is located in a dry hot climate, so without irrigation farming would not be feasible. The closest option available on Table 5. Water Resource Availability Scoring is Option 9.

Score: 45

3. The Surrounding Agricultural Land Rating

The Surrounding Agricultural Land Rating is designed to provide a measurement of the level of agricultural land use for lands in close proximity to a subject project. This score is determined by evaluating the subject site in relation to the broader adjacent agricultural area identified as the "Zone of Influence". Applying the prescribed formula to calculate the Zone of Influence it was determined to be 276 acres. The subject site is 14.07 acres. The result of these factors equals 0.05%. ($14/276 \text{ acres} = .005$). applying this ratio to Table 6 equals a score of zero.

Score: 0

4. The Surrounding Protected Resource Land Rating

The Surrounding Protected Resource Land Rating is essentially an extension of the Surrounding Agricultural Land Rating, and is scored in a similar manner. Protected resource lands are those lands with long term use restrictions that are compatible with or supportive of agricultural uses of land (i.e.- Williamson Act contracted lands, Publicly owned lands maintained as park, forest, or watershed resources, Lands with agricultural, wildlife habitat, open space, or other natural resource easements that restrict the conversion of such land to urban or industrial uses). Similar to the Surrounding Agricultural Land Rating, this score is determined by evaluating the subject site in relation to the broader adjacent Protected Resource Lands identified as the "Zone of Influence". Applying the prescribed formula to calculate the Zone of Influence it was determined to be 276 acres. The subject site is 14.07 acres. The result of these factors equals 0.05%. (14/276 acres = .005). applying this ratio to Table 6 equals a score of zero.

Score: 0

These factors were then incorporated into the worksheet attached in Appendix A.

Scoring thresholds are based upon the total LESA score and in some cases the component LE and SA sub-scores (where LESA scores are between 40 and 79 points). Combining the LE and SA factors summarized above, the **overall LESA score is 33.6**.

When applying this score to Table 9 of Section IV. "California Agricultural LESA Scoring Thresholds - Making Determinations of Significance Under CEQA" shown below, the result categorizes the subject property as: "Not Considered Significant".

Table 9. California LESA Model Scoring Thresholds

Total LESA Score	Scoring Decision
0 to 39 Points	Not Considered Significant
40 to 59 Points	Considered Significant <u>only</u> if LE <u>and</u> SA subscores are each <u>greater</u> than or equal to 20 points
60 to 79 Points	Considered Significant <u>unless</u> either LE <u>or</u> SA subscore is <u>less</u> than 20 points
80 to 100 Points	Considered Significant

Closing

We appreciate this opportunity to be of service to you. If you should have any questions regarding the contents of this correspondence, please do not hesitate to call.

Sincerely,

ALBUS & ASSOCIATES, INC.



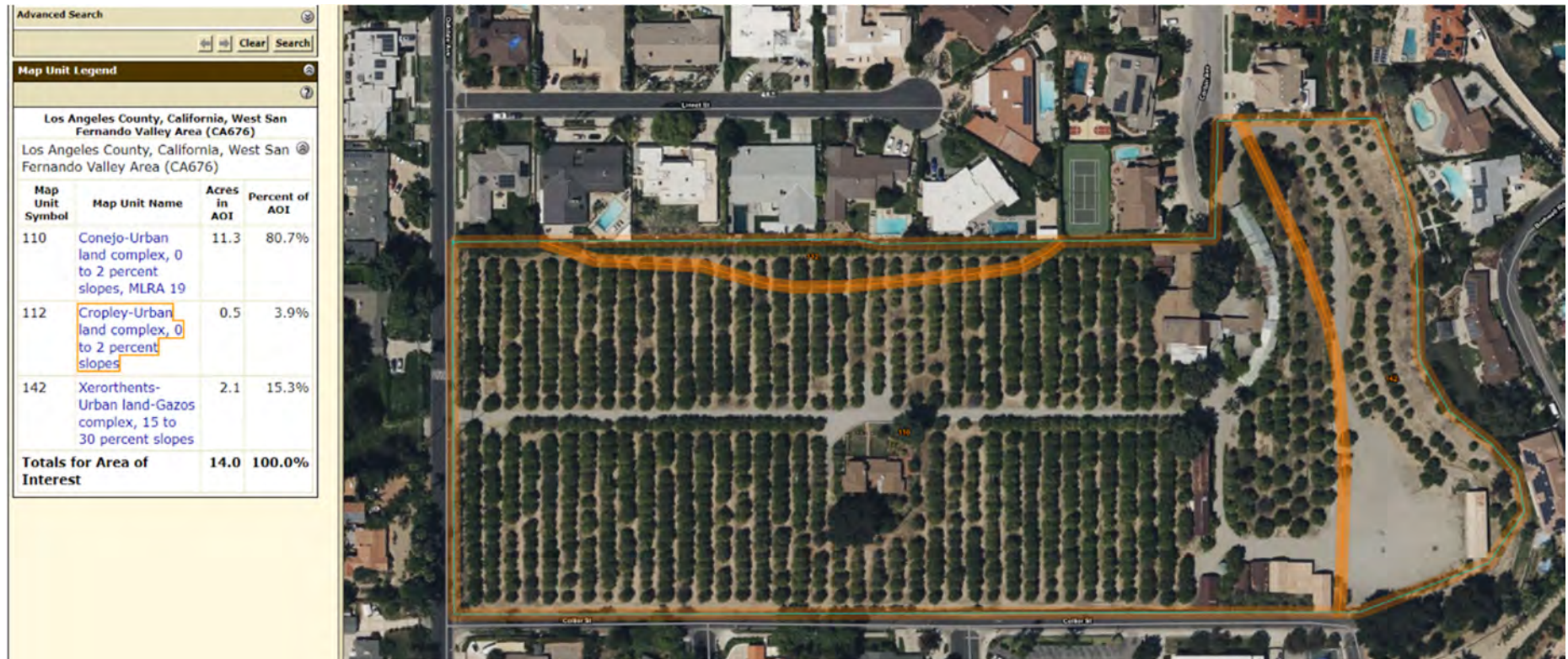
David E. Albus
Principal Engineer
GE 2455



Attachments: Appendix A- California Agricultural LESA Worksheets

APPENDIX A

California Agricultural LESA Worksheets



From the USDA Natural Resources Conservation Service, Web Soil Survey (WSS)

Appendix A. California Agricultural LESA Worksheets

NOTES

Calculation of the Land Evaluation (LE) Score

Part 1. Land Capability Classification (LCC) Score:

- (1) Determine the total acreage of the project.
- (2) Determine the soil types within the project area and enter them in **Column A** of the **Land Evaluation Worksheet** provided on page 2-A.
- (3) Calculate the total acres of each soil type and enter the amounts in **Column B**.
- (4) Divide the acres of each soil type (**Column B**) by the total acreage to determine the proportion of each soil type present. Enter the proportion of each soil type in **Column C**.
- (5) Determine the LCC for each soil type from the applicable Soil Survey and enter it in **Column D**.
- (6) From the LCC Scoring Table below, determine the point rating corresponding to the LCC for each soil type and enter it in **Column E**.

LCC Scoring Table

LCC Class	I	Ile	Ils,w	IIle	IIls,w	IVe	IVs,w	V	VI	VII	VIII
Points	100	90	80	70	60	50	40	30	20	10	0

- (7) Multiply the proportion of each soil type (**Column C**) by the point score (**Column E**) and enter the resulting scores in **Column F**.
- (8) Sum the LCC scores in **Column F**.
- (9) Enter the LCC score in box <1> of the **Final LESA Score Sheet** on page 10-A.

Part 2. Storie Index Score:

- (1) Determine the Storie Index rating for each soil type and enter it in **Column G**.
- (2) Multiply the proportion of each soil type (**Column C**) by the Storie Index rating (**Column G**) and enter the scores in **Column H**.
- (3) Sum the Storie Index scores in **Column H** to gain the Storie Index Score.
- (4) Enter the Storie Index Score in box <2> of the **Final LESA Score Sheet** on page 10-A.

Land Evaluation Worksheet

Land Capability Classification (LCC) and Storie Index Scores

A	B	C	D	E	F	G	H
Soil Map Unit	Project Acres	Proportion of Project Area	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
110	11.3	80.7%	3c	60	48.42		
112	0.5	3.9%	3s	60	2.34		
142	2.1	15.3%	8	0	0		
Totals		(Must Sum to 1.0)		LCC Total Score	50.76	Storie Index Total Score	

Site Assessment Worksheet 1.

Project Size Score

	I	J	K
LCC Class	LCC Class	LCC Class	LCC Class
I - II	III	IV - VIII	
Total Acres			
Project Size Scores			

Highest Project Size Score

NOTES

Final LESA Score Sheet

Calculation of the Final LESA Score:

- (1) Multiply each factor score by the factor weight to determine the weighted score and enter in Weighted Factor Scores column.
- (2) Sum the weighted factor scores for the LE factors to determine the total LE score for the project.
- (3) Sum the weighted factor scores for the SA factors to determine the total SA score for the project.
- (4) Sum the total LE and SA scores to determine the Final LESA Score for the project.

	Factor Scores	Factor Weight	Weighted Factor Scores
LE Factors			
Land Capability Classification	<1> 50.76	0.25 0.5	25.38
Storie Index	<2> N.A.	0.25	N.A.
<i>LE Subtotal</i>		0.50	25.38
SA Factors			
Project Size	<3> 10	0.15	1.5
Water Resource Availability	<4> 45	0.15	6.75
Surrounding Agricultural Land	<5> 0	0.15	0
Protected Resource Land	<6> 0	0.05	0
<i>SA Subtotal</i>		0.50	8.25
Final LESA Score			33.63

For further information on the scoring thresholds under the California Agricultural LESA Model, consult Section 4 of the Instruction Manual.

Exhibit B

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

MONIQUE LAWSHE
PRESIDENT

ELIZABETH ZAMORA
VICE-PRESIDENT

MARIA CABILDO
CAROLINE CHOE
MARTINA DIAZ
PHYLLIS KLEIN
KAREN MACK

MICHAEL R. NEWHOUSE
JACOB SAITMAN

CITY OF LOS ANGELES
CALIFORNIA



KAREN BASS
MAYOR

EXECUTIVE OFFICES

200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

VINCENT P. BERTONI, AICP
DIRECTOR

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

HAYDEE URITA-LOPEZ
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

Decision Date: December 20, 2024

Appeal Period Ends: January 6, 2025

Oakdale Estates, LLC (O,A)
Borstein Enterprises
11766 Wilshire Boulevard, Unit 820
Los Angeles, CA 90025

Sarah Golden (R)
Rosenheim & Associates, Inc.
21600 Oxnard Street, Unit 630
Woodland Hills, CA 91367

Vesting Tentative Tract Map No.: VTT-83927
Related Case ZA-2023-2170-ZAD-ZV-ZAA
5300 North Oakdale Avenue
Community Plan: Encino-Tarzana
Zone: RA-1
Council District: 3 – Bob Blumenfield
CEQA : ENV-2020-6762-EIR

In accordance with provisions of Los Angeles Municipal Code (LAMC) Sections 17.03 and 17.15, the Advisory Agency approves Vesting Tentative Tract Map No. 83297 (map date-stamped June 7, 2024) located at 5300 North Oakdale Avenue, for the merger and re-subdivision of four (4) parcels into 23 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. (The subdivider is hereby advised that the LAMC may not permit his maximum approved density. Therefore, verification should be obtained from the Department of Building and Safety, which will legally interpret the Zoning code as it applies to this particular property.) For an appointment with the Development Services Center call (213) 482-7077, (310) 231-2598 or (818) 374-5050

NOTE on clearing conditions: When two or more **agencies** must clear a condition, subdivider should follow the sequence indicated in the condition. For the benefit of the applicant, subdivider shall maintain record of all conditions cleared, including all material supporting clearances and be prepared to present copies of the clearances to each reviewing agency as may be required by its staff at the time of its review.

This property is located in Very High Fire Severity Zone.

This property is located in a Liquefaction Zone.

This property is located in a Landslide Zone.

This property is located in Santa Monica Mountains Zone.

A portion of this property is located in Baseline Hillside Ordinance (BHO) and may be required to comply with Hillside Ordinance per LAMC 12.21 C.10.

The proposed building plans have not been checked for and shall comply with Building and Zoning Code requirements. With the exception of revised health or safety standards, the subdivider shall have a vested right to proceed with the proposed development in substantial compliance with the ordinances, policies, and standards in effect at the time the subdivision application was deemed complete. Plan check will be required before any construction, occupancy or change of use.

If the proposed development does not comply with the current Zoning Code, all zoning violations shall be indicated on the Map.

An appointment is required for the issuance of a clearance letter from the Department of Building and Safety. The applicant is asked to contact Helen Nguyen at (213) 482-0427 or helen.nguyen@lacity.org to schedule an appointment.

DEPARTMENT OF RECREATION AND PARKS

If you have any questions or comments regarding this information please feel free to contact Park Fees Staff at, (213) 202-2682 or rap.parkfees@lacity.org, at your convenience.

72. That the Park Fee paid to the Department of Recreation and Parks be calculated as a Subdivision (Quimby in-lieu) fee.

DEPARTMENT OF TRANSPORTATION

If you have any questions or comments regarding this information please feel free to contact LADOT Staff at, ladot.onestop@lacity.org at your convenience.

FIRE DEPARTMENT

The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished BY APPOINTMENT ONLY, in order to assure that you receive service with a minimum amount of waiting please call (213) 482-6543. You should advise any consultant representing you of this requirement as well.

73. Access for Fire Department apparatus and personnel to and into all structures shall be required.
74. Address identification. New and existing buildings shall have approved building identification placed in a position that is plainly legible and visible from the street or road fronting the property.
75. One or more Knox Boxes will be required to be installed for LAFD access to project. Location and number to be determined by LAFD Field Inspector. (Refer to FPB Reg # 75).
76. The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
77. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Fire Lane Requirements:

- 1) Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
 - 2) The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.
 - 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.
 - 4) Submit plot plans indicating access road and turning area for Fire Department approval.
 - 5) All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.
 - 6) Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.
 - 7) Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.
 - 8) All public street and fire lane cul-de-sacs shall have the curbs painted red and/or be posted "No Parking at Any Time" prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac.
 - 9) No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.
78. Construction of public or private roadway in the proposed development shall not exceed 10 percent in grade.
79. Site plans shall include all overhead utility lines adjacent to the site.

80. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.
81. The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.
82. Smoke Vents may be required where roof access is not possible; location and number of vents to be determined at Plan Review.
83. No proposed development utilizing cluster, group, or condominium design of one or two family dwellings shall be more than 150 feet from the edge of the roadway of an improved street, access road, or designated fire lane.
84. On small lot subdivisions, any lots used for access purposes shall be recorded on the final map as a "Fire Lane".
85. Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan S-470-0.
86. Standard cut-corners will be used on all turns.
87. Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.
88. The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

2014 CITY OF LOS ANGELES FIRE CODE, SECTION 503.1.4 (EXCEPTION)

- a. When this exception is applied to a fully fire sprinklered residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel AND the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.
- b. It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term "horizontal travel" refers to the actual path of travel to be taken by a person responding to an emergency in the building.

- c. This policy does not apply to single-family dwellings or to non-residential buildings.

FPB #105

5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.

That in order to provide assurance that the proposed common fire lane and fire protection facilities, for the project, not maintained by the City, are properly and adequately maintained, the sub-divider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:

- A. The establishment of a property owners association, which shall cause a yearly inspection to be, made by a registered civil engineer of all common fire lanes and fire protection facilities. The association will undertake any necessary maintenance and corrective measures. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.
 - B. The future owners of affected lots with common fire lanes and fire protection facilities shall be informed of their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as the Advisory Agency must approve required hereinabove in writing after consultation with the Fire Department.
 - C. In the event that the property owners association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance.
 - D. Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.
 - E. That the Common Fire Lanes and Fire Protection facilities be shown on the Final Map.
89. The plot plans shall be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.

90. Any roof elevation changes in excess of 3 feet may require the installation of ships ladders.
91. Provide Fire Department pathway front to rear with access to each roof deck via gate or pony wall less than 36 inches.
92. Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; But, in no case greater than 150ft horizontal travel distance from the edge of the public street, Private Street or Fire Lane. This stairwell shall extend onto the roof.
93. Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.
94. Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.
95. Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

DEPARTMENT OF WATER AND POWER

96. Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power (LADWP) for compliance with LADWP's Water System Rules and requirements. Upon compliance with these conditions and requirements, LADWP's Water Services Organization will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1(c).)

BUREAU OF STREET LIGHTING

97. Prior to the recordation of the final map or issuance of the Certificate of Occupancy (C of O), street lighting improvement plans shall be submitted for review and the owner shall provide a good faith effort via a ballot process for the formation or annexation of the property within the boundary of the development into a Street Lighting Maintenance Assessment District.

Improvement condition added to S-3(c).

Notes: The quantity of street lights identified may be modified slightly during the plan check process based on illumination calculations and equipment selection.

Conditions set: 1) in compliance with a Specific Plan, 2) by LADOT, or 3) by other legal instrument excluding the Bureau of Engineering conditions, requiring an improvement that will change the geometrics of the public roadway or driveway

Exhibit C

5300 OAKDALE AVENUE Los Angeles, California



Historical Resource Assessment Report

Prepared by:
Teresa Grimes | Historic Preservation
January 2024

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EXECUTIVE SUMMARY

This report presents the results of a historical resource assessment of the property located at 5300 Oakdale Avenue in the Encino - Tarzana Community Plan Area of the City of Los Angeles. It is approximately 14 acres in size and includes four Assessor Parcel Numbers: 2164-008-001, 005, 006, and 007. The property is commonly known as Bothwell Ranch and includes a single-family house, grove, and variety of ancillary buildings. A proposed project (Project) would involve the redevelopment of approximately ten acres as 21 single-family lots with the development and donation of approximately four acres to the Santa Monica Mountains Recreation and Conservation Authority (MRCA).

The Project Site is not currently listed under federal, state, or local landmark or historic district programs; however, it was identified in the 2012 historic resource survey of the Encino - Tarzana Community Plan Area as appearing eligible for listing in federal, state, and local registers of historical resources. In 2022, the Los Angeles City Council denied a Historic-Cultural Monument nomination, which means it is ineligible for listing in the local register of historical resources. The City Council findings; however, only pertained to the local register and not the federal or state registers of historical resources. Thus, Teresa Grimes | Historic Preservation (TGHP) was retained to evaluate the Project Site on an intensive level to determine if it is eligible for listing in the National Register of Historic Places and/or California Register of Historical Resources.

After careful inspection, investigation, and evaluation, TGHP concluded that neither the Project Site collectively nor any of the buildings, structures or sites individually are eligible for listing in the National Register of Historic Places and California Register of Historical Resources for lack of historical significance and architectural distinction. The recommended Status Code is 6Z, ineligible for listing in federal, state, and local registers of historical resources through survey evaluation. Thus, the Project Site does not qualify as a historical resource as defined by the California Environmental Quality Act.

1. INTRODUCTION

1.1 PURPOSE

The purpose of this report is to analyze whether a proposed project (Project) would impact historical resources defined by the California Environmental Quality Act (CEQA). CEQA defines a historical resource as a property listed in or determined to be eligible for listing in the California Register of Historical Resources.¹ The Project is located at 5300 Oakdale Avenue (Project Site) in the Encino - Tarzana Community Plan Area (CPA) of the City of Los Angeles. The Project Site is situated on the east side of Oakdale Avenue at the corner of Collier Street (see **Figure 1**). It is approximately 14 acres in size and includes four Assessor Parcel Numbers, which are listed below:

- APN 2164-008-001 is Lot 2 of Tract No. 10515 (9.81 acres)
- APN 2164-008-005 is a portion of Lot 36 of Tract No. 2605 (0.30 acres)
- APN 2164-008-006 is a portion of Lot 37 of Tract No. 2605 (1.96 acres)
- APN 2164-008-007 is a portion of Lots 36 and 37 of Tract No. 2605 (1.92 acres)

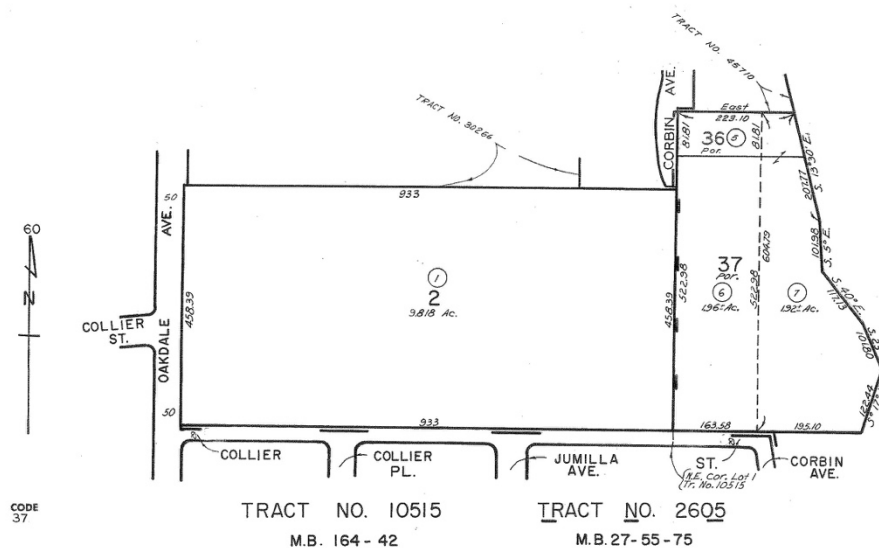


Figure 1: Assessor Parcel Map of Project Site.

APN 2164-008-001 is occupied by a single-family house and a citrus grove; APN 2164-008-007 is occupied by a storage building; and APN 2164-008-006 is occupied by a variety of ancillary buildings. The Project Site is commonly known as Bothwell Ranch, so named for Lindley F. Bothwell, the patriarch of the family who once owned the property. A proposed project (Project) would involve the redevelopment of approximately ten acres as 21 single-family lots and the donation of approximately four acres to the Mountains Recreation & Conservation Authority (MRCA). All of the buildings would be removed pursuant to City of Los Angeles

¹ Public Resources Code § 21084.1

Department of Building and Safety requirements. One new one-story building would be constructed on the MRCA site.

1.2 QUALIFICATIONS OF PREPARER

Teresa Grimes | Historic Preservation (TGHP) was retained to prepare this report. Ms. Grimes fulfills the qualifications for a historic preservation professional outlined in Title 36 of the Code of Federal Regulations, Part 61. Her résumé is included in **Appendix A**.

1.3 PREVIOUS DESIGNATIONS AND EVALUATIONS

The following sources were consulted to determine if the Project Site is currently designated under federal, state, or local landmark or historic district programs or previously evaluated as a potential historical resource:

1. The Built Environment Resources Directory (BERD) is managed and maintained by the State Office of Historic Preservation (OHP). The BERD includes properties listed and determined to be eligible for listing in the National Register of Historic Places, listed and determined to be eligible for listing in the California Register of Historical Resources, designated California Registered Historical Landmarks, and designated California Points of Historical Interest. The BERD also includes information on properties evaluated in historic resource surveys and properties subject to federal and state environmental laws processed through OHP. This research revealed the Project Site is not included in the BERD.
2. The Los Angeles Historic Resources Inventory website, HistoricPlacesLA.org, is managed and maintained by the Los Angeles Office of Historic Resources (OHR). It includes properties designated as Los Angeles Historic-Cultural Monuments (HCM) or located within designated Historic Preservation Overlay Zones (HPOZ). This research revealed that the Project Site is not a designated HCM or located within a designated HPOZ.
3. The findings of SurveyLA, the citywide historic resource survey of Los Angeles, are also included in HistoricPlacesLA.org as well as individual survey reports for each Community Plan Area (CPA). This research revealed the Project Site was identified by SurveyLA in 2012 as appearing eligible for federal, state, and local landmark designation “as one of the last remaining family-owned commercial citrus groves in the San Fernando Valley.”
4. The Zone Information and Map Access System (ZIMAS) is maintained by the Department of City Planning. Designated historical resources can also be identified through ZIMAS under the Planning and Zoning/Historic Preservation Review tab. This research revealed that the Project Site was nominated as an HCM in 2019 but denied by the Los Angeles City Council in 2022.

1.4 AREA OF POTENTIAL IMPACT

A preliminary field inspection of the Project Site and surrounding area was also conducted to determine the scope, or Area of Potential Impact (API), of the report. The API is the geographic area within which a project may directly or indirectly impact the character of historical resources. In determining the API, three factors were considered: the existing setting of the Project Site; the scale and nature of the proposed development relative to the existing setting; and the impacts the Project could have on historical resources identified within the API.

The Project Site is located in a RA-1 Zone and is surrounded single-family residential neighborhoods. Directly south of the Project Site on Collier Street is the CHIME Institute's Schwarzenegger Community School. As the proposed Project would be consistent with pattern and scale of the surrounding development, the API for the report was limited to the Project Site. Historical resources, beyond the Project Site were eliminated from inclusion within the API because the Project would have no potential for direct or indirect impacts. The Project would blend into the existing built environment and would therefore have no adverse effect on their physical integrity.

1.5 METHODOLOGY

As the Encino - Tarzana CPA historic resource survey is over five years old, TGHP determined that the Project Site should be evaluated on an intensive level to determine if any of the buildings, structures, or sites collectively or individually qualify as historical resources as defined by CEQA. To evaluate the Project Site as a potential historical resource, TGHP performed the following tasks:

1. Conducted an intensive field inspection of the Project Site, during which the general condition and physical integrity of the buildings, structures, and sites was assessed. Digital photographs were taken during the field inspection.
2. Determined that the Project Site should be evaluated individually as a potential historical resource according to National Park Service, State Office of Historic Preservation, and Los Angeles Office of Historic Resources standards. The area in which the Project Site is located was not identified as a potential historic district by SurveyLA. During the field inspection, it was determined that there were not enough properties with shared physical characteristics or historical associations in the area to form a potential historic district.
3. Conducted research using a variety of primary and secondary materials to establish the development history of the Project Site as well as the contexts in which it should be evaluated. Sources included, but were not limited to, online sources, published literature in local and regional history, city directories, historic aerial photographs, newspaper archives, and maps. The City of Los Angeles Department of Building and

Safety did not have building permits for any of the improvements on the Project Site. Additional sources included interviews with members of the Bothwell family.

4. Consulted the Context/Theme/Property Type (CTP) eligibility standards formulated for the *Los Angeles Citywide Historic Context Statement (LACHCS)* to identify the appropriate CTPs under which to evaluate the Project Site.
5. Reviewed and analyzed ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation designations, and assessment processes and programs to evaluate the significance and integrity of the Project Site as a potential historical resource.

2. REGULATORY FRAMEWORK

2.1 HISTORICAL RESOURCES UNDER CEQA

CEQA defines a historical resource as a property listed in the California Register of Historical Resources (California Register) or determined to be eligible for listing in the California Register by the State Historical Resource Commission. The California Register automatically includes properties listed and formally determined to be eligible for listing in the National Register of Historic Places (National Register) as well as some California State Landmarks and Points of Historical Interest. A property designated under a local preservation ordinance or identified as eligible in a historic resource survey is presumed to be a historical resource unless a preponderance of evidence demonstrates that the property is not architecturally, historically, or culturally significant.² The lead agency has the discretion to treat a property as a historical resource if it meets statutory requirements and substantial evidence supports the conclusion. Thus, there are three categories of historical resources:

- *Mandatory historical resources* are properties listed or determined to be eligible for listing in the California Register by the State Historical Resource Commission.³
- *Presumptive historical resources* are properties included in a local register of historical resources as defined by subdivision (k) of Section 5020.1 of the Public Resources.⁴ Presumptive historical Resources may also include properties deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 of the Public Resources Code, unless a preponderance of the evidence demonstrates that the resource is not significant. Subdivision (g) pertains to the requirements of nomination historic resource surveys for listing in the California Register.⁵

² Public Resources Code § 5024.1 and Title 14 California Code of Regulations § 4850 & § 15064.5 (a) (2).

³ Title 14 California Code of Regulations § 15064.5 (a) (1).

⁴ A local register of historical resources is defined as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

⁵ A resource identified as significant in a historical resource survey may be listed in the California Register if the survey meets all of the following criteria:

- *Discretionary historical resources* are properties determined to be eligible for listing in the California Register by the lead agency. The determination must be supported by evidence in light of the whole record.⁶

The National Register, California Register, and Los Angeles designation programs are discussed below.

2.2 NATIONAL REGISTER OF HISTORIC PLACES

The National Register is "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."⁷

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:⁸

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.

The survey has been or will be included in the State Historic Resources Inventory.

1. The survey and the survey documentation were prepared in accordance with office procedures and requirements.
2. The properties were evaluated and determined by the office (SHOP) to have a significance rating of Category 1 to 5 on DPR Form 523.
3. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the integrity of the resource.

⁶ Title 14 California Code of Regulations § 15064.5 (a) (3) (4).

⁷ Title 36 Code of Federal Regulations Part 60.2.

⁸ Title 36 Code of Federal Regulations Part 60.4.

Historic Districts

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”⁹

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.¹⁰ A district’s significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.¹¹

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.¹²

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be

⁹ Ibid.

¹⁰ Title 36 Code of Federal Regulations Part 60.3 (d).

¹¹ *National Register Bulletin #21: Defining Boundaries for National Register Properties* (Washington D.C.: U.S. Department of the Interior, 1995), 12.

¹² *National Register Bulletin #16: How to Complete the National Register Registration Form* (Washington D.C.: U.S. Department of the Interior, 1997), 16.

judged only when it is evaluated within its historic context. Historic contexts are “those patterns or trends in history by which a specific...property or site is understood and its meaning...is made clear.”¹³ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in *National Register Bulletin #15* as “the ability of a property to convey its significance.”¹⁴ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

2.3 CALIFORNIA REGISTER OF HISTORICAL RESOURCES

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.¹⁵

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

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 770 onward; and
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion on the California Register.¹⁶

¹³ Patrick Andrus and Rebecca Shrimpton, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: U.S. Department of the Interior, 1997), 7.

¹⁴ *National Register Bulletin #15*, 44.

¹⁵ Public Resources Code § 5024.1 (a).

¹⁶ Public Resources Code § 5024.1 (d).

Criteria and Integrity

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.¹⁷

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. It is possible that properties may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. An altered property may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.¹⁸

SOHP Survey Methodology

The evaluation instructions and classification system prescribed by the SOHP for recording historical resources provide a Status Code for use in classifying potential historical resources. In 2003, the Status Codes were revised to address the California Register. These Status Codes are used statewide in the preparation of historical resource surveys and evaluation reports. The first code is a number that indicates the general category of evaluation. The second code is a letter that indicates whether the property is separately eligible (S), eligible as part of a district (D), or both (B). There is sometimes a third code that describes some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.

¹⁷ Public Resources Code § 5024.1 (c).

¹⁸ Title 14 California Code of Regulations § 4852 (c).

3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

The specific Status Codes referred to in this report are as follows:

- 3S** Appears eligible for the National Register as an individual property through survey evaluation.
- 3CS** Appears eligible for the California Register as an individual property through survey evaluation.
- 5S3** Appears to be individually eligible for local listing or designation through a survey evaluation.
- 6Z** Found ineligible for National Register, California Register, or local designation through survey evaluation.

2.4 LOS ANGELES CULTURAL HERITAGE ORDINANCE

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. A monument is any site, building, or structure of particular historic or cultural significance to the City of Los Angeles and may be designated if it meets at least one of the following criteria:

1. The proposed HCM 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; or
2. The proposed HCM is associated with the lives of historic personages important to national, state, city, or local history;

3. The proposed HCM 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.¹⁹

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

2.5 LOS ANGELES HISTORIC PRESERVATION OVERLAY ZONE ORDINANCE

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zones (HPOZs) in 1979; Angelino Heights became Los Angeles' first HPOZ in 1983. A HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. According to Section 12.20.3 of the City of Los Angeles Municipal Code, the criteria for the designation of a HPOZ are:

1. Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time; or
2. Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or
3. Retaining the building, structure, landscaping, or natural feature, would contribute to the preservation and protection of a historic place or area of historic interest in the City.²⁰

2.6 LOS ANGELES GENERAL PLAN CONSERVATION ELEMENT

The City of Los Angeles General Plan includes a Conservation Element. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes a policy to continue to protect historical and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.

¹⁹ Los Angeles Administrative Code § 22.171.7.

²⁰ Ordinance No. 184903, accessed October 1, 2020,

https://preservation.lacity.org/sites/default/files/Citywide%20HPOZ%20Ordinance_current_1.pdf.

3. ENVIRONMENTAL SETTING

3.1 BRIEF HISTORY OF THE AREA²¹

Although the San Fernando Valley is often thought of in terms of widespread, post-World War II suburban expansion, the south San Fernando Valley (where Encino and Tarzana are located) has a rich development history that spans the previous two centuries. The majority of the area was once part of the San Fernando Mission lands. While there are no resources remaining from the Mission era within the area, the Spanish explorers and friars established El Camino Real, the path connecting the missions, generally along the route now occupied by Ventura Boulevard. This road in its many incarnations has operated as a major thoroughfare since the late eighteenth century and continues to serve as the dominant commercial artery of the south San Fernando Valley.

In the mid-nineteenth century, the area was part of the large Rancho El Encino (sometimes called the Rancho Los Encinos), a 4,500-acre landholding situated between the Los Angeles River and the Santa Monica Mountains. The name Encino, which persists today, was derived from the Spanish word for oak in reference to the native Valley Oak and Coastal Live Oak trees that thrived in the area. A cluster of buildings from Rancho El Encino, including the Vicente de la Osa adobe (built 1849) and the Garnier building and blacksmith shop (built circa 1870), are situated around a natural spring near the intersection of Ventura Boulevard and Balboa Avenue in what is now Los Encinos State Historic Park.²²

By the turn of the twentieth century, the area remained sparsely populated and predominantly agricultural, with an abundance of fruit and walnut orchards, grazing lands and wheat fields. The first major developmental changes began in the 1910s in anticipation of the construction of the 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. Anticipating the eventual real estate boom of the San Fernando Valley, landowners began to plat and prepare for residential settlement and commercial development. The Los Angeles Suburban Homes Company, headed by *Los Angeles Times* publisher Harrison Gray Otis, purchased large tracts of land throughout the area and other newly annexed sections of the Valley. Before dividing the land, the partners of the company chose acreage for themselves. Otis later sold his acreage to Tarzan author Edgar Rice Burroughs in 1919. Burroughs created the community of Tarzana out of his property.²³

²¹ Adapted from Architectural Resources Group, "Historic Resource Survey Report: Encino-Tarzana Community Plan Area," *SurveyLA Los Angeles Historic Resource Survey* (City of Los Angeles Office of Historic Resources, February 2013), 8-12.

²² Kevin Roderick, *The San Fernando Valley: America's Suburb* (Los Angeles: Los Angeles Times Books, 2002), 197-198.

²³ John Taliaferro, *Tarzan Forever* (New York: Simon and Schuster, 1999), 152-156.

The south San Fernando Valley felt the effects of the boom of the 1920s, which had a tremendous impact on the development of Los Angeles as a whole. The 1920s saw major road improvements in the Valley, including work on the Cahuenga Pass and, later, the Sepulveda Tunnel, which provided vehicular access between the San Fernando Valley and West Los Angeles. This coincided with the paving of Ventura Boulevard and the establishment of Mulholland Drive. Improved vehicular access spurred residential development in the southeast San Fernando Valley. Sherman Oaks Circle, which is located at the far eastern edge of the Survey Area, was subdivided in the 1920s. Though it was not entirely built out until the postwar era, the platting of Sherman Oaks Circle near the Sepulveda Tunnel and adjacent to Ventura Boulevard is indicative of the impact of these improvements on the development of the area.

Despite a surge of residential development in the eastern communities of the San Fernando Valley in the 1920s, Encino and Tarzana remained somewhat rural due to their relatively remote location. As such, these areas became attractive to potential homeowners seeking large properties and a quiet, rustic lifestyle while remaining within Los Angeles city limits. Melody Acres, a 1920s subdivision in Tarzana north of Ventura Boulevard, featured large lots with rows of citrus trees and equestrian zoning. The former Amestoy family ranch in Encino was also subdivided for residential development and called Encino Acres. This subdivision, which was located north of Ventura Boulevard between Balboa and White Oak Avenues, featured lots that ranged in size between two and 20 acres. Properties were used for country estates, hobby ranching, and farming, including the cultivation of lemons, oranges, and walnuts. The residences and some ancillary buildings from these properties remain in the center of blocks that were later carved up into smaller lots, forming a distinctive pattern of parcels in the Encino Acres subdivision.

After floods ravaged the south San Fernando Valley in 1938, the city began channelizing the Los Angeles River and set aside the Sepulveda Basin in the northeast of the Survey Area as a flood control area. The Army Corps of Engineers designed the Sepulveda Dam, completed in 1941. A small golf course opened in the basin in 1941, but the area remained in the control of the Army for next decade. The flood control infrastructure greatly reduced the risk of catastrophic flooding in the San Fernando Valley and made the area more desirable for wide-spread residential development and federally insured home loans.

The demand for housing following World War II was central to the development of Encino and Tarzana. In the five years between 1945 and 1950, the population of the San Fernando Valley doubled to just over 400,000. Anticipating postwar growth, the City initially planned for the development of the Valley to follow prevailing regional planning principles, with small urban employment centers and residential subdivisions surrounded by agricultural land. Two planning documents—a 1943 Master Plan and a 1944 Zoning Plan—called for the retention of agricultural zones around self-contained urban communities with designated industrial and commercial areas to supplement the agricultural economy and supply employment for present

and future residents.²⁴ However, due to the area's exponential growth and unprecedented demand for housing, agricultural land was quickly converted into residential subdivisions and the plans were never fully realized.

The postwar boom brought tremendous change to the character of the Encino and Tarzana communities. Large residential subdivisions cropped up on both sides of Ventura Boulevard and, as the demand grew, land value skyrocketed. Fragmented urban development encroached on orchards and ranches. As a result, farmers could no longer make enough profit to cover rising property taxes, and most were forced to downsize or sell. The opening of the 101 and 405 Freeways in the early 1960s further bolstered suburban growth, connecting the area to many of the Downtown and Westside business districts in Los Angeles and relieving congestion on city streets. Single family residential development continued south into the hills of the Santa Monica Mountains during the late 1950s through the 1970s.

A long history of racially restrictive housing and ownership practices meant that most of the Valley remained “a thoroughly white domain” even through the post-World War II boom. Author Kevin Roderick observed that restrictive covenants had factored into patterns of town building and settlement going back to the Valley's earliest history.²⁵ With the exceptions of Pacoima and San Fernando in the northern Valley, which were relatively ethnically diverse from the early twentieth century, members of ethnic minorities who resided in the San Fernando Valley were generally confined to segregated areas. Beginning in 1922, any property sold in Tarzana had a restriction within the deed stating, “that said premises, or any part thereof shall not be leased, sold, or conveyed to or occupied by any person not of the Caucasian race.”²⁶ Deed restrictions like these were common throughout the greater San Fernando Valley and were not effectively eliminated until well into the 1970s.²⁷

Despite the prevalence of restrictive housing practices, many of the young families flocking to the area in the postwar period were Jewish. The Jewish population was more easily able to obtain housing in middle-class suburban neighborhoods than other “non-white” racial groups and in the decade following World War II the Jewish population of the San Fernando Valley doubled.²⁸ This influx led to the doubling or tripling in size of existing Valley congregations and the opening of new congregations, including Valley Beth Shalom on Ventura Boulevard in Encino.²⁹ Many of the Jewish residents of the area resisted the discrimination and isolation of Jewish communities in other parts of Los Angeles and sought to assimilate into the suburban

²⁴ Mary Corbin Sies and Christopher Silver, *Planning the Twentieth-Century American City* (Baltimore: Johns Hopkins University Press, 1996), 258.

²⁵ Roderick, 139-140.

²⁶ Catherine Jurca, *White Diaspora: The Suburb and the Twentieth Century American Novel* (Princeton: Princeton University Press, 2001), 42.

²⁷ Josh Sides, L.A. City Limits, *African American Los Angeles from the Great Depression to the Present* (Berkeley: University of California Press, 2003) 104, 193.

²⁸ George J. Sanchez, *Beyond Alliances: The Jewish Role in Reshaping the Racial Landscape of Southern California* (West Lafayette: Purdue University Press, 2012), 43.

²⁹ Lawrence Jorgenson, *The San Fernando Valley: Past and Present* (Los Angeles: Pacific Rim Research, 1982), 191-192.

American lifestyle. In 1956, Jewish businessman Bernard Shapiro purchased El Caballero Country Club in Tarzana and made it one of the first country clubs in Los Angeles to allow both Christian and Jewish members.³⁰

3.2 PROJECT SITE HISTORY AND DESCRIPTION

Development History

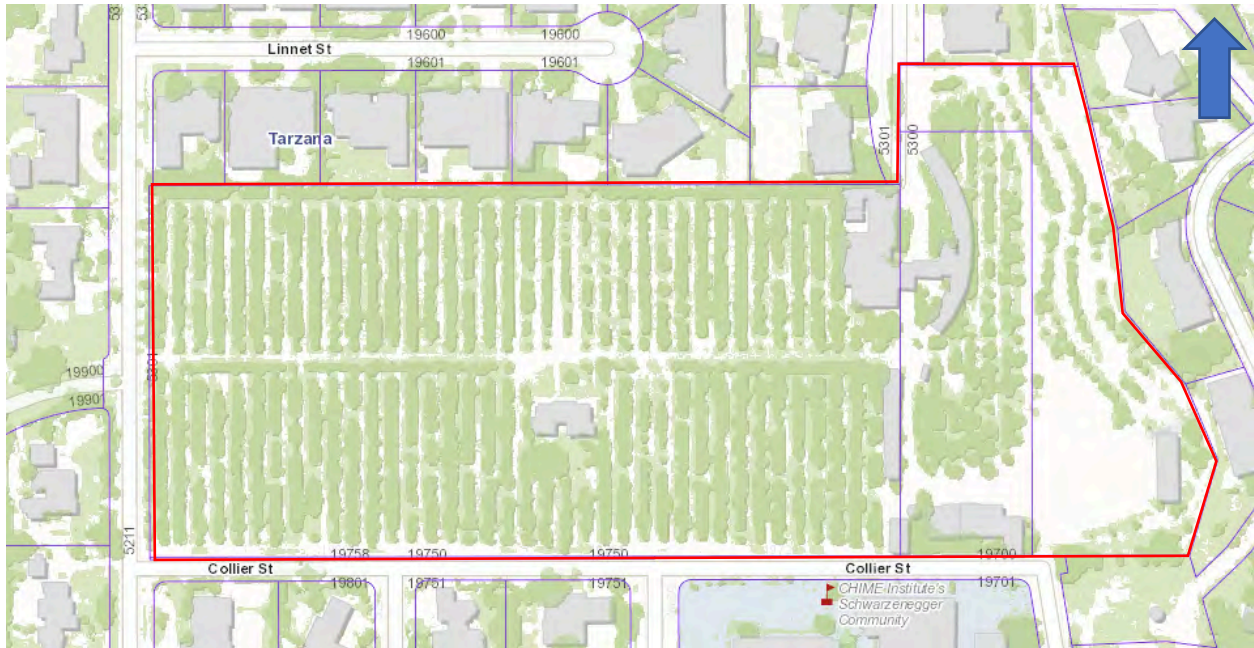


Figure 2: Project Site outlined in red, base map courtesy of the Los Angeles County Office of the Assessor.

The modern origins of the Project Site can be traced to the subdivision of Tract No. 2605 in 1914 by the Title Insurance and Trust Company. At that time, Ventura Boulevard was still called Ventura County Road. Most of the existing side streets, including Oakdale Avenue, had been laid out. Sometime after 1914, Henry R. Bristol, Sr. (1855-1928) purchased the lots (Lots 35, 39, 40, 41, 42, 43, and 44, see **Figure 4**) along Oakdale Avenue from Ventura Boulevard on the north to Wells Drive on the south.³¹ The combined acreage of the lots was approximately 70. Bristol and his wife, Ella had been living in Santa Ana since 1882.³² He was a pharmacist as was his father before him.³³ By 1916, he had sold his business and the family had moved to the San Fernando Valley.³⁴

³⁰ Scott Harris, "A Rich Man with a Social Conscience," *Los Angeles Times*, April 18, 1998.

³¹ "Spec House Story Stirs Memories," *Los Angeles Times*, April 1, 1979, and Tract Map No. 2605.

³² "Ella Bristol obituary," *Santa Ana Register*, June 25, 1924.

³³ "Bristol Avenue & H.R. Bristol," O.C. History Roundup, accessed on April 12, 2022, <https://ochistorical.blogspot.com/2016/12/bristol-avenue-hr-bristol.html>

³⁴ "Home Wedding," *Santa Ana Register*, October 18, 1916.

The earliest available aerial photograph of the Project Site vicinity dates from 1928 (see **Figure 5**). At that time, the 70 acres was planted with citrus trees. The photograph also depicts two clusters of buildings, one on the north with a driveway from Ventura Boulevard and one on the south with access from Wells Drive. The cluster on the north included the home of Henry and Ella Bristol, Sr. According to the 1920 U.S. Census, their address was 251 Ventura Road. In 1924, they are listed in the Los Angeles City Directory at 19730 Ventura Boulevard.³⁵ The cluster on the south included the home of their eldest son, Henry Bristol, Jr.³⁶ The 1920 U.S. Census identified the property as 252 Wells Drive. The address eventually changed to 19801 W. Wells Drive.

Ella Bristol died in 1924 and Henry, Sr. in 1928. In 1926, Samuel and Myra Bothwell agreed to a future acquisition of a portion of Lots 40 and 41 of Tract No. 2605 owned by Henry Bristol Sr.³⁷ In 1929, the heirs of the Bristol estate sold the remaining property to a group of buyers including Samuel, Myra, Lindley, and Marion Bothwell; Paul J. Howard and Alaseba Howard; and Nels and Anette K. Nelson. The property was subdivided as Tract No. 10515 and included six lots (see **Figure 6**). The Howard family bought the former home of Henry Bristol Jr. on Wells Drive, which became Lot 1 of Tract No. 10515.³⁸ Howard was in the nursery business and may have used the property as a weekend getaway as the family was still listed at 900 S. Rimpau Boulevard from 1930 and 1942.³⁹

By 1934, Lindley F. Bothwell and his first wife Marion Seale Bothwell were living on Lot 2 of Tract No. 10515, which was already planted with citrus trees. Lot 3 to the north was owned by other members of the Bothwell family but may have been managed by Lindley.⁴⁰ In 1930, Lindley and Marion were living in Beachwood Canyon, and he was working in the orange business.⁴¹ Thus, it appears that he owned Lot 2, but had not yet made the San Fernando Valley his home. The Los Angeles County Office of the Assessor estimates the date of construction of the house as 1934. This date is confirmed by the fact that Marion Seale Bothwell was registered to vote at this address.

Bothwell purchased a few acres of Lots 36 and 37 of Tract No. 2605 east of the grove around 1940. By that time, there was a driveway bisecting the grove and a house on the south side of the driveway in the approximate center. In addition, Bothwell had constructed what appear to be garages, sheds, and a pergola type structure on the southeastern portion of the Project Site (see **Figure 7**). These buildings apparently supported his diverse businesses. Beginning in the

³⁵ According to the 1930 U.S. Census, Sidney Fletcher moved into the former home of Henry Bristol Sr. and farmed the property. By 1960, the buildings were demolished and replaced with a shopping center.

³⁶ The address of the property is 19801 W. Wells Drive, and the house remains but is not visible from the public right-of-way.

³⁷ Quit Claim Deed recorded on February 17, 1930, between Citizens National Trust & Savings Bank of Los Angeles and Samuel and Myra Bothwell.

³⁸ Beginning in 1930 the Howards start to improve the property; 1930LA19021 P.J. Howard 11 x 24 addition to house Lot 1 of Tract 10515 and 1930LA05526 P.J. Howard private lounge for tennis court.

³⁹ 1930 and 1940 U.S. Census; 1942 World War II Draft Registration Card.

⁴⁰ Lot 3 was sold and subdivided for single-family lots in 1965.

⁴¹ 1930 U.S. Census.

1940s, there are numerous sources that chronical Bothwell's' car collecting activities; however, no new buildings or structures were added through 1944 (see **Figure 8**). In 1947, Bothwell constructed a storage shed for the collection at the easternmost portion of the Project Site, which had not yet been planted with citrus trees (see **Figure 9**).⁴²

A fire on the Project Site in 1949 destroyed a portion of the car collection as well as the buildings in which the cars were stored.⁴³ These were apparently the garages, sheds, and pergola type structure on the southeastern portion of the Project Site as they are no longer present in the 1952 photograph (see **Figure 10**).

The group of buildings on the northeastern portion of the Project Site were constructed between 1952 and 1964 (see **Figures 10, 11, and 12**). The train station and storage shed with tracks on Lot 36 were constructed by 1978 for the train collection (see **Figure 14**). The 1978 photograph also documents that the grove was beginning to decline. There are numerous trees that had been removed. By 1980, the trees were virtually gone and by 1985 the grove had been entirely replanted (see **Figures 15 and 16**).

There are approximately 1,500 citrus trees on the Project Site currently, which are predominately Valencia oranges. There are also a few other citrus trees including Naval oranges and grapefruit cultivars. The grove has not been managed or operated as a commercial business since 2016. A report prepared on November 8, 2019 by Brian Neufeld described a combination of healthy and sick trees suffering from disease and lack of water.

Architectural Description



Figure 3: Buildings and structures on Project Site outlined in white, base map courtesy of Google.

⁴² Los Angeles County Office of the Assessor and 1947 historic aerial photograph.

⁴³ "Fire Destroys Antique Autos Used in Films," *Los Angeles Times*, February 5, 1949.

The Project Site is approximately 14 acres in size and generally divided into western and eastern portions. The western portion is the larger of the two and includes APN 2164-008-001, which is 9.81 acres in size. The land is relatively flat and planted with evenly spaced citrus trees in rows with a north-south orientation. Bisecting the grove is a gravel driveway, which begins on Oakdale Avenue and terminates in a surface parking area on the eastern portion (see **Figure 17**). The eastern portion includes APNs 2164-008-005, 006, and 007, which is 4.18 acres in size. The topography rises from west to east. In addition to the surface parking area, there are a variety of buildings and structures with citrus trees planted sporadically in the eastern portion.

On the south side of the driveway in the approximate center of the grove is a single-family house constructed in circa 1934 (see **Figure 18**). The house has a wood-framed structure and U-shaped configuration sheathed in channel rustic wood siding. The open end of the U faces south toward the backyard. The west wing of the U is two stories in height and covered by a hipped roof, the east wing is one-story in height and covered by a rear-facing gabled roof, and the connecting middle wing is one-story in height and covered by a side-facing gabled roof. The roofs have shallow overhanging eaves with exposed rafter tails. The primary (north) façade is organized asymmetrically. The main entrance is located in the middle wing within a projecting front porch. A projecting balcony extends along the second story of the west wing. Windows throughout the house are mostly multi-paned wood casements set in pairs. Similarly designed French doors open on to the balcony as well as the rear patio. Some wood windows have been replaced with vinyl and aluminum sliders. The front yard is separated from the driveway by a low brick garden wall. Brick is also used as a paving material for the walkways, front porch, and rear patio. The yard is fenced on all sides, vinyl picket on the front and chain link on the sides and rear.

At the northeastern corner of the grove is a two-story multi-purpose building constructed between 1952 and 1964 (see **Figure 19**). The first floor was used as a workshop and car storage, while the second floor as an office and caretaker's quarters. The building has a wood-framed structure with various components indicating it was constructed in phases. The roofs are mostly side-facing gables with overhanging eaves and exposed rafter tails. The exterior is clad with board-and-batten wood siding. The fenestration is irregular and the patches in the siding and variety of doors and windows suggest changes over time. There is an assortment of window sizes, types, and materials including wood awning and aluminum sliding sash. There are shed roof lean-tos on the north and south. The one on the north is enclosed with corrugated metal siding. South of the multi-purpose building are two water storage tanks.

East of the multi-purpose building is the train station and storage shed constructed around 1978 (see **Figures 20, 21, and 22**). The station is a wood-framed structure with a T-shaped configuration covered by an intersecting gabled roof. The roof is characterized by overhanging eaves with exposed rafters. Board and batten wood siding clads most of the building, but the pattern changes on the west façade. The east façade appears to be the most intact with a wood paneled door and double-hung wood sash windows. Other windows include aluminum sliding sash. Attached to the west façade is a gabled roof lean-to that appears to have originally been

freestanding. The storage shed is a crescent-shaped structure with a wood frame and corrugated metal roof.

At the southeastern corner of the grove is two-story building that was used for car storage (see **Figure 23**). The building has a wood-framed structure, gabled roof, and long rectangular shape with a north-south orientation. The exterior, including the roof, is covered with sheets of corrugated metal; however, board and batten wood siding is visible in the gable face of the north façade. There is a car ramp on the south leading to large sliding doors on the second story.

Further southeast is another water storage tank and cluster of corrugated metal sheds (see **Figure 24**).

At the easternmost side of the Project Site is another car storage building two-stories in height (see **Figure 25**). Constructed in circa 1947, the building has a wood-framed structure and long rectangular shape with a north-south orientation. The exterior, including the roof, is covered with sheets of corrugated metal. There are large swing doors along the first story of the west façade and four single-paned windows spaced evenly along the second story. There is a car ramp at the south end leading to large sliding doors on the second story.

4. HISTORIC CONTEXTS

The significance of a property must be evaluated within its historic context(s). Historic contexts are those patterns or trends in history by which a specific property is understood. The *Los Angeles Citywide Historic Context Statement (LACHCS)* was used to identify the relevant contexts for judging the significance of the Project Site. The *LACHCS* is organized into nine broad contexts that cover the period from 1850 to 1980 and are specific to Los Angeles. Within each context, important themes and sometimes sub-themes in the City's history are explored. The most relevant contexts for the evaluation of the Project Site are the Industrial Development context and the Architecture and Engineering context. The associated themes, sub-themes, and eligibility standards are summarized below.

4.1 CASH CROPS FOR EXPORT⁴⁴

In 2012, the Project Site was identified and evaluated by SurveyLA in the Agricultural Roots Theme of the Industrial Development Context. Properties evaluated under this theme may be significant in the area of Agriculture. Some properties may also be significant in the areas of Ethnic Heritage and/or Architecture. Cash crops, particularly citrus, were among the most important agricultural products cultivated in Los Angeles in the late nineteenth and early twentieth centuries. With technological advancements in irrigation, shipping, and refrigeration, citrus became the highest valued crop produced in the region between 1890 and 1938,

⁴⁴ Adapted from "Context: Industrial Development, 1850-1980," *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, December 2015), 24, 26-27.

supplemented by olives and flowers and bulbs. Imagery surrounding the production of cash crops was key to marketing the bounty of Los Angeles produce to consumers nationwide. Cash crops are also associated with the history of many ethnic/cultural groups who worked in the fields, farms, and packing houses harvesting and packing fruits, vegetables, bulbs, and flowers. Extant properties related to cash crop industries may include packing houses, cooperative associations, remnants of groves or orchards, and olive vats and tanks.

Remnants of groves and orchards may be significant for their association with cash crop agricultural production in Los Angeles. They represent the last vestiges of a once expansive agricultural landscape in Los Angeles, and very few properties remain that are associated with cash crop agriculture in the city. Groves and orchards, particularly those that do not have a related agricultural building, may not have a strong enough association to be eligible for the National Register or California Register although they may meet local significance thresholds. The eligibility standards for the grove/orchard property type are found in **Table 1**.

TABLE 1: GROVE/ORCHARD
Context: Industrial Development, 1850-1980
Theme: Agricultural Roots, 1850-1965
Subtheme: Cash Crops for Export, 1870-1945
Property Type: Grove/Orchard
Eligibility Standards
<ul style="list-style-type: none"> • Planted within the period of significance • Retains ability to convey historic association from the period of significance • Retains most of the essential physical features from the period of significance
Character-Defining/Associative Features
<ul style="list-style-type: none"> • Concentration of numerous mature citrus or deciduous trees planted with ordered spacing characteristic of cultivated grove or orchard • Is large enough to convey a historically rural setting • Typically associated with a least one additional agricultural building or landscape feature (may include a farm/ranch house; outbuilding, land, cooperative association office, or packing house)
Integrity Considerations
<ul style="list-style-type: none"> • Should retain integrity of Location, Setting, Feeling, and Association • Original trees may have been replaced over time as their productivity decreased, as long as the historical configuration of trees is intact, and the majority of existing trees are mature

4.2 THE RANCH HOUSE⁴⁵

Within the Architecture and Engineering context, the single-family house on the Project Site is best evaluated within The Ranch House theme and the Traditional Custom Ranch House sub-theme. The other buildings and structures on the Project Site are utilitarian in design, and there are no themes or sub-themes in the Architecture and Engineering context applicable for their evaluation as historical resources.

Single-family houses evaluated under Traditional Custom Ranch House sub-theme may be significant in the area of Architecture. Eligible houses will be significant for the quality of their architecture and will be important individual examples that exemplify the Traditional Ranch style and the Ranch house type. Often described as resembling the “quintessential Ranch house,” the Traditional Ranch style is distinguished by its rusticated appearance and incorporation of elements reminiscent of the vernacular, nineteenth century buildings of California and the American West. It was the Traditional Ranch aesthetic that was widely disseminated in popular magazines and replicated across the nation. Eligible examples are custom designed, were typically designed by a noted architect, and stand out as among the best examples of the style. These characteristics help to distinguish Traditional Custom Ranch houses from the scores of mass-produced tract houses designed in the Traditional Ranch style. The eligibility standards for Traditional Custom Ranch houses are in **Table 2**.

TABLE 2: TRADITIONAL CUSTOM RANCH HOUSE	
Context: Architecture and Engineering, 1850-1980	
Theme: The Ranch House, 1930-1975	
Sub-theme: Traditional Custom Ranch House, 1930-1975	
Eligibility Standards	
<ul style="list-style-type: none"> • Was constructed during the period of significance 	
<ul style="list-style-type: none"> • Is an important individual example that exemplifies the Traditional Ranch style and Ranch house type 	
<ul style="list-style-type: none"> • Was custom designed (as opposed to mass-produced) 	
Character-Defining/Associative Features	
<ul style="list-style-type: none"> • 1,500 – 3,500 square feet in size 	
<ul style="list-style-type: none"> • Asymmetrical informal composition with one or more wings 	
<ul style="list-style-type: none"> • Attached garages, often forming one wing 	
<ul style="list-style-type: none"> • Brick and stone chimneys 	
<ul style="list-style-type: none"> • Close relationship to its yard 	
<ul style="list-style-type: none"> • Dutch doors 	
<ul style="list-style-type: none"> • Eaves with exposed rafter tails 	
<ul style="list-style-type: none"> • Exposed post and beam construction 	

⁴⁵ Adapted from “Context: Architecture and Engineering, 1850-1980; Theme: The Ranch House, 1930-1975,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, December 2015), 21-22.

TABLE 2: TRADITIONAL CUSTOM RANCH HOUSE
• French doors
• Gabled roof, originally shingled
• Garage door with barn door crossing brace
• One or two stories in height
• Shutters
• Sliding glass doors
• Two-story versions can include Monterey Colonial elements
• Typically designed by a well-known architect
Integrity Considerations
• Should retain integrity of Location, Design, Materials, Workmanship
• Roof line alterations are not acceptable
• Additions are allowed if not visible within public view

4.3 LINDLEY F. BOTHWELL

Lindley Fowler Bothwell (1901-1986) was born in Los Angeles in 1901 to Samuel Fowler Bothwell and Myra Josephine Lindley. He attended the University of Southern California (USC) and received a B.A. and M.A. in History.⁴⁶ He was an enthusiastic supporter of USC throughout his life. His grandfather, Dr. Walter Lindley, was the first dean of the USC School of Medicine and two of his aunts founded the USC chapter of the Kappa Alpha Theta sorority. Bothwell founded the USC chapter of the Sigma Alpha Epsilon fraternity.⁴⁷ He was also the coach of the USC Yell Leaders (and later the USC Song Girls, founded in 1967) for 60 years. In 1926, he received another degree from the Oregon Agricultural College. In 1927, Bothwell married Marion Seale who was from Palo Alto. In 1930, they were living in Beachwood Canyon with their newborn son, Lindley Jr. and Lindley Sr. was working in the “orange business.”⁴⁸ By 1934, they had moved to the Project Site, which the extended Bothwell family had purchased in 1929.⁴⁹ In 1935, their daughter Bonnie was born. Sometime in the late 1940s they divorced, and Marion and the two children moved to Oakland.⁵⁰ Bothwell remarried Helen Ann Bothwell in 1948.⁵¹

Bothwell was an entrepreneur whose main businesses involved agriculture and automobiles. There are no scholarly sources on Bothwell’s citrus business. The only contemporaneous source regarding Bothwell described him as an “agricultural adviser to film stars in the San Fernando Valley.”⁵² Bruce Bothwell, the grandson of Lindley Bothwell, recalled that his grandfather

⁴⁶ U.S. School Year Books, 1919-1924.

⁴⁷ “USC’s ‘Mr. B,’ Yell, Song Girl Coach, Dies,” *Los Angeles Times*, June 21, 1986.

⁴⁸ 1930 U.S. Census.

⁴⁹ Voter Registration.

⁵⁰ 1949 Oakland City Directory and 1950 U.S. Census.

⁵¹ “James Ricci, San Fernando Valley Widow’s Orange Grove May Be Last of Its Kind,” *Los Angeles Times*, September 2, 1998.

⁵² *San Francisco Examiner*, February 16, 1939.

managed other citrus groves in the San Fernando Valley. He also remembered that oranges were not packed on the property, rather his grandfather was a member of the Sunkist Cooperative. The oranges from the property were picked and transported to a Sunkist plant in either Fillmore or Claremont where they were sorted, packed, and shipped. While Bothwell had a couple of employees to maintain the grove, the packinghouse supplied the labor for picking the fruit.⁵³ The rising cost of labor and water made small groves less profitable, so Bothwell began a mail-order fruit business. While some of the citrus for the gift baskets was grown on the property, other fruits and nuts were purchased from produce markets in Downtown.⁵⁴

His interest in history was apparently reflected in his passion for antique cars. He purchased a vintage Model T Ford when he was still a student at USC.⁵⁵ While there is little information on his citrus business, his involvement with antique cars was widely reported in local newspapers. He was a founding member of the Sports Car Club of America (SCCA) and the president of the Western Region of the SCCA. In addition to collecting antique cars, Bothwell also raced them. In 1949, he broke a 30-year standing speed record at Indianapolis in his 1913 Peugeot.⁵⁶ A fire that year depleted his collection but did not destroy it entirely. The loss included the only two-cylinder Packard in existence.⁵⁷ The collection continued to grow and included fire engines, streetcars, and trains. A 1964 article in the *Los Angeles Times* stated that his collection was the second largest in the nation.⁵⁸ Features of the collection were a 1911 Rolls Royce custom-built for the Nicolas II, the last czar of Russia and a 1905 Mercedes owned by Alfred Vanderbilt. This hobby grew into a business of leasing antique cars for film and television productions, although Bothwell made the collection available for charity fundraisers and school groups. Bothwell died on June 19, 1986, at the age of 84.⁵⁹

5. EVALUATION OF ELIGIBILITY

As previously stated, the Project Site was identified by SurveyLA in 2012 as appearing eligible for federal, state, and local landmark designation “as one of the last remaining family-owned commercial citrus groves in the San Fernando Valley.” Standard preservation practice evaluates collections of buildings, structures, and sites from similar time periods and historic contexts as districts. This is especially the traditional approach for the evaluation of farms and ranches that are often developed where buildings, structures, and sites are functionally related. As the SurveyLA evaluation was conducted from the public right-of-way, however, not all of the buildings were visible to the surveyors. Thus, the individual buildings were not described,

⁵³ James Ricci, “San Fernando Valley Widow’s Orange Grove May Be Last of Its Kind,” *Los Angeles Times*, September 2, 1998.

⁵⁴ Teresa Grimes interview with Bruce Bothwell on April 20, 2022.

⁵⁵ “Get the Dusters, Mother, It’s the Horseless Cart,” *The Citizens News*, October 7, 1961. Another source stated his first car was a 1901 Oldsmobile.

⁵⁶ Jeffrey Hansen, “Pioneer Surfer and Auto Racer Has Hobbies to Stay Young,” *Los Angeles Times*, November 26, 1972.

⁵⁷ “Fire Destroys Antique Autos Used in Films,” *Los Angeles Times*, February 5, 1949.

⁵⁸ William Estes, “Older Cars Kept ‘Sharp’ by Collectors,” *Los Angeles Times*, October 18, 1964.

⁵⁹ Edward J. Boyer, “Lindley Bothwell, USC’s Mr. B. Yell, Song Girl Coach Dies,” *Los Angeles Times*, June 21, 1986.

researched, or identified as contributing or noncontributing. Thus, the Project Site is re-evaluated below on an intensive level based upon additional investigation and research conducted for this report.

5.1 NATIONAL REGISTER OF HISTORIC PLACES

Criterion A

To be eligible for listing in the National Register under Criterion A, a property must have a direct association with events that have made a significant contribution to the broad patterns of our history. The context considered in the evaluation of eligibility under Criterion A was the history of agriculture, specifically the Cash Crops for Export sub-theme from the *LACHCS*.

The period of significance for the Cash Crops for Export sub-theme is 1870 to 1945, which coincides with the era of significant agricultural production in Los Angeles. The eligibility standards state that a grove should be “planted within the period of significance.” As previously stated, the grove on the Project Site was completely replaced between 1980 and 1985. Thus, it was not planted during the period of significance. The integrity considerations state that “original trees may have been replaced over time as their productivity decreased, as long as the historical configuration of trees is intact, and the majority of existing trees are mature.” Thus, a grove could still be considered significant if some of the trees have been replaced. The 2012 SurveyLA evaluation of the Project Site did not acknowledge the replacement of any, let alone, all of the trees. Therefore, it appears to have been based upon the presumption that the grove dated to the 1920s, not the 1980s.

SurveyLA also identified the orange grove at the southeast corner of the California State University, Northridge (CSUN) campus. The 5-acre grove has 400 Valencia orange trees. While the university was established in 1958, the grove dates to the early 1940s. It is unknown if the grove was ever used as a commercial growing operation since its existence prior to the university was very short lived. According to CSUN, more than 100 trees have been replaced and replanted since 2008. The SurveyLA evaluation recognized that “some of the grove’s original trees have been removed and replaced in-kind.” Therefore, the eligibility standards and integrity considerations expect a grove to be planted between 1870 and 1945 and allow for selective but not comprehensive tree replacement.

The Orcutt Ranch Horticulture Center in Canoga Park is another example of a property in the City of Los Angeles with a citrus grove. Orcutt Ranch is designated HCM No. 31, was determined eligible for listing in the National Register through the Section 106 review process and is listed in the California Register. The property was principally recognized for its association with William Orcutt, although it appears to meet the eligibility standards for the Cash Crops for Export sub-theme. Orcutt was one of California’s early oil pioneers who cemented his place in Los Angeles history with the discovery of prehistoric fossils at the La Brea Tar Pits. The 24-acre property was his vacation home. Orcutt planted orange trees on the property in the 1920s and

served as head of the Canoga Park Citrus Association. Six acres of orange trees remain on the property.⁶⁰

There are no groves or orchards of any kind in Los Angeles County listed in the National Register in the context of agriculture; however, 12 examples are listed on the NPS Digital Archive. In most cases, the grove/orchard is associated with an individual or company that played a significant role in the history of agriculture. Agricultural properties listed in the National Register are also significant as early examples of farming and/or settlement in a region. The Berwick Manor and Orchard in Carmel Valley appears to be the only example of the type in California. The property was purchased by Edward Berwick in 1869 and originally consisted of 120 acres. Berwick was a noted agriculturalist who experimented with fruit growing. His farm was a model of its type and the pear he developed there became world renowned. Berwick is credited as the first person to raise winter pears on a commercial scale in the United States. The property is now 29-acres and is the only intact farmstead remaining from the period.⁶¹

The Project Site does not meet the eligibility standards for the Cash Crops for Export sub-theme and is not comparable to other properties listed in the National Register in the context of agriculture. The Project Site is not associated with a prominent company, is not associated with any scientific advancements in citriculture, and is not an early or important example of its type. The grove was originally planted in the early 1920s and was merely part of a trend that was already well established. The grove was entirely replaced between 1980 and 1985 and has not been managed or operated for commercial purposes since 2016. For all the reasons outlined above, neither the Project Site as a whole nor any of the individual buildings, structures, or sites (such as the grove) are significant under Criterion A.

Criterion B

To be eligible for listing under Criterion B, a property must be associated with the lives of persons significant in our past. Several steps are involved in determining whether a property is significant under Criterion B. First, the person must be significant within a historic context. Second, the property must be associated with the person's productive life. Finally, the property must be compared with other associated properties to identify the best representation of the person's historic contributions.⁶²

From 1929 to 1986, the Project Site was owned and occupied by Lindley F. Bothwell and his family. No evidence was found indicating that he was significant within a historic context. While he appears to have been a successful businessman who was active in the community, research did not reveal any important contributions to the history of agriculture. Bothwell was one of

⁶⁰ The City of Los Angeles designated the property LAHCM No. 31 in 1965 and opened the area to residents four years later.

⁶¹ "Berwick Manor & Orchard," National Register of Historic Places Nomination Form, November 17, 1977.

⁶² *National Register Bulletin #15*, 14-15.

many individuals who moved to the San Fernando Valley and worked in the citrus industry during the early part of the twentieth century. The completion of the Los Angeles-Owens River Aqueduct in 1913 provided a reliable supply of water. In the San Fernando Valley, acreage irrigated through artificial means grew 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.⁶³

When Bothwell purchased the Project Site in 1929, the land was already planted with citrus trees. He was not among the pioneers of the San Fernando Valley or among the largest land holders. At one time the grove was 20 acres but reduced before and after his death to 14 acres.⁶⁴ His own property was relatively small for a commercial grove, and his main business appears to have been managing other groves. The claim in newspaper articles that he managed groves throughout the state could not be confirmed.⁶⁵ As groves were replaced with subdivisions, he developed a mail-order fruit business. It appears to have been a profitable but modest enterprise compared with companies like Mission Pak, a popular brand founded by George C. Page in 1917.

Bothwell's automobile collection was undoubtedly his greatest achievement. He purchased his first antique car when he was still in college and began collecting others in the 1930s. Enthusiasts like Bothwell began collecting cars almost as soon as they were invented. Kirk Gibson and George Waterman, for example, had assembled a large enough collection by 1931 to establish a museum called Musée des Vénérables. The collection included 47 vehicles that ranged from an 1896 Waverly to 1913 Fiat.⁶⁶ Bothwell's collection by all accounts was not just large, but included important examples from Austro-Daimler, Buick, Cadillac, Ford, Hudson, National, Packard, and Pope-Hartford, among others. After the death of Helen Ann Bothwell in 2016, the collection was sold.⁶⁷

Even if there was a context developed for this topic and Bothwell was considered a significant figure, the importance would be attached to the collection, not the buildings in which the collection was stored. The storage buildings on the Project Site are utilitarian in design and do not express the collection they once, but no longer contain.

⁶³ Roderick, 71.

⁶⁴ Tract No. 30266 was previously Lot 3 of Tract No. 10515. It was sold and subdivided in 1965 by John Lawton and Mary Bothwell Lawton and Jordan Johnson and Elizabeth Bothwell Johnson. Mary was Lindley's younger sister. Helen Ann Bothwell sold 3.94 acres on the northeast in 1988.

⁶⁵ "He had his own soil and bacteriological laboratory, providing pruning, spraying, and other technical assistance to some 40 ranches from San Francisco to the Mexican border." Jack Birkinshaw, "Agriculture, Once King, All but Finished in Valley," *Los Angeles Times*, November 28, 1978. Other articles claimed he owned or managed 34 ranches. Still other articles stated he was one of the ten largest citrus growers in the United States by 1943 and also raised cattle on a grand scale.

⁶⁶ Rick Carey, "The Founding Fathers of Car Collecting: Waterman & Gibson," *Haggerty*, May 13, 2022.

⁶⁷ Kurt Ernst, "Bonhams to offer 50 cars from the Bothwell Collection in November sale," *Hemmings*, October 16, 2017.

The Project Site is not closely associated with any other individuals, significant or otherwise. Therefore, neither the Project Site as a whole nor any of the individual buildings, structures, or sites are significant under Criterion B.

Criterion C

To be eligible for listing under Criterion C, a property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction.

Type, Period, or Method of Construction

A type, period, or method of construction refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. This aspect of Criterion C encompasses all architectural styles and construction practices. A building or structure is eligible as an architectural type specimen if it is an important example of construction practices from a particular period in history.⁶⁸

Research did not yield any results indicating that the house on the Project Site was considered an important work during its time or in subsequent decades. The house possesses some of the characteristics of Traditional Ranch style, but not enough to make it a true representation of the style. It is lacking in the rustic appearance exhibited in finer examples of the style, which often have wood shake roofs and rambling plans. It is also lacking in elements from vernacular nineteenth century buildings like dovecotes, Dutch doors, and shutters. Although the house has French doors, a front porch, and a rear patio, it is rather disconnected from the outdoors. Additionally, the house did not involve any novel or noteworthy construction techniques, so it does not appear to be significant for embodying the distinctive characteristics of a method of construction. It is an ordinary example of a wood-framed structure with a concrete slab foundation. Finally, the ancillary buildings and structures have been altered since their initial construction and are utilitarian in design. They do not exhibit quality of design or uniqueness in construction that would make them good examples of a type, period, or method of construction. Therefore, neither the Project Site as a whole nor any of the individual buildings or structures are significant under this aspect of Criterion C.

Work of a Master

A master is a figure of generally recognized greatness in a field of design or construction such as architecture, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The property must express a particular phase in the development of the master's career, an aspect of his or her work, or a

⁶⁸ *National Register Bulletin #15*, 17-18.

particular idea or theme in his or her craft. A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect.⁶⁹

The architect of the house on the Project Site is unknown as the construction of the building was not published and the original permit for the building was not found. As it is a typical example of the type, period, and method of construction there is no reason to believe it is the work of a master. The same is the case for the ancillary buildings and structures. Therefore, neither the Project Site as a whole nor any of the individual buildings or structures are significant under this aspect of Criterion C.

High Artistic Values

The possession of high artistic values refers to a property's articulation of a particular concept of design so fully that it expresses an aesthetic ideal.⁷⁰ A property does not possess high artistic values, however, if it does not express aesthetic ideals or design concepts more fully than other properties of its type.⁷¹

A property eligible under this aspect of Criterion C would need to possess ornamentation and detail to lend it high artistic value, which the house on the Project Site does not. Rather, it exhibits the basic features of Traditional Ranch style and does not include the craftsmanship or detailed handwork found in finer examples of the style such as brick, stone, and wood features like chimneys, shingles, shutters, Dutch doors, carved rafter tails, and carved bargeboards. The same is the case for the ancillary buildings and structures. Therefore, neither the Project Site as a whole nor any of the individual buildings or structures are significant under this aspect of Criterion C.

Distinguishable Entity

The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. A district is a property that possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. A district must be significant under Criterion A, Criterion B, or other aspects of Criterion C, or Criterion D as well as being an identifiable entity.⁷²

The area in which the Project Site is located was not identified as a potential district by SurveyLA. During the field inspection conducted for this report, it was determined that there were not enough properties with shared physical characteristics or historical associations in the area to form a potential district. Therefore, the Project Site is being evaluated individually.

⁶⁹ Ibid., 20.

⁷⁰ *National Register Bulletin #15*, 20.

⁷¹ Ibid.

⁷² Ibid., 5.

While the Project Site could be classified as a district because it is an identifiable entity with a variety of resources, as discussed above and below, it is not significant under any criteria. Districts usually reflect one principal activity such as farming or ranching. One of the character defining features of the grove/orchard property type is that they are “typically associated with a least one additional agricultural building or landscape feature.” But in this case, many of the buildings on the Project Site were constructed as storage for Bothwell’s car collection and not for agricultural purposes. Therefore, based upon additional investigation and further research, the Project Site is not significant under this aspect of Criterion C.

Conclusion

For all the reasons outlined above, the Project Site does not appear to be significant under Criterion C.

Criterion D

A property may be eligible under Criterion D if it has yielded, or may be likely to yield, information important in prehistory or history. This criterion generally applies to archaeological sites but may apply to buildings, structures, and objects in instances where the property may contain important information about such topics as construction techniques or human activity. In any case, the property must be the principal source of information. This is unlikely to be true for the Project Site because it did not involve the use of any novel or noteworthy construction techniques. Furthermore, research did not indicate the Project Site to have the potential to yield information about human activity. Therefore, the Project Site does not appear to be significant under Criterion D.

Integrity

To be eligible for listing in the National Register, properties must retain their physical integrity from the period of significance. In the case of architecturally significant properties, the period of significance is normally the date of construction. For historically significant properties, the period of significance is usually measured by the length of the associations. As neither the Project Site nor any of the individual buildings, structures, or sites are significant under any of the National Register criteria, it has no period of significance, and an assessment of its integrity is not required.

Conclusion

The field inspection and research conducted for this report indicate that the Project Site as a whole as well as the individual buildings structures, and sites lack historical significance and architectural distinction. Therefore, it does not appear to be eligible for listing in the National Register under any criteria.

5.2 CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register was modeled on the National Register. The criteria for eligibility for listing in the California Register are virtually the same as the National Register. Therefore, the Project Site appears to be ineligible for listing in the California Register for the same reasons noted above.

5.3 LOS ANGELES HISTORIC-CULTURAL MONUMENTS

On June 29, 2022, the Los Angeles City Council denied a HCM nomination for the Project Site. The City Council determined that the Project Site did not meet the criteria for significance in the Los Angeles Cultural Heritage Ordinance, which are essentially the same as criteria A/1, B/2, and C/3 for listing in the National and California Registers. Therefore, the Project Site is ineligible for HCM designation for the same reasons outlined above.

6. CONCLUSIONS

The Project Site at 5300 Oakdale Avenue is not currently designated under national, state, or local landmark or historic district programs. The Project Site was identified in the 2012 historic resource survey of the Encino – Tarzana CPA as appearing eligible for listing in federal, state, and local registers of historical resources. After careful inspection, investigation, and evaluation, TGHP concludes that none of the buildings, structures, or sites on the Project Site appear to be individually or collectively eligible for listing in the National and California Registers due to a lack of significance. The Los Angeles City Council determined the Project Site does not qualify for designation as a HCM. The recommended Status Code is 6Z, ineligible for designation under federal, state, and local landmark programs through survey evaluation. Thus, the Project Site is not a historical resource as defined by CEQA.

7. REFERENCES

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Evening Vanguard. Various dates.

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Starr, Kevin. *Material Dreams: Southern California Through the 1920s*. New York: Oxford University Press, 1990.

Appendix A – Résumé

TERESA GRIMES | Historic Preservation

Teresa.Grimes@icloud.com
323-868-2391

Teresa Grimes has 30 years of experience in the field of historic preservation. She is widely recognized as an expert in the identification and evaluation of historical resources having successfully prepared dozens of landmark and historic district applications for a wide variety of property types. Teresa graduated from the University of California with a Master of Art degree in Architecture and has worked in the private, public, and non-profit sectors. Teresa has extensive experience in the preparation of environmental compliance documents in accordance with the California Environmental Quality Act including the identification of historical resources, analysis of direct, indirect, and cumulative impacts, and development of mitigation measures. Her many projects throughout Southern California include the Art Center College of Design Master Plan, Baldwin Hills Crenshaw Plaza, Cinerama Dome Entertainment Center, City of Hope Master Plan, Claremont Graduate University Master Plan, Claremont McKenna College Master Plan, John Anson Ford Theatres, Oakwood School Master Plan, Los Angeles County Museum of Art, Times Mirror Square, Sunset Las Palms Studios, and Sunset Bronson Studios.

Educational Background

- M.A., Architecture, University of California, Los Angeles, 1992
- B.A., Political Science, University of California, Los Angeles, 1986

Qualifications

- Meets the Secretary of the Interior’s Professional Qualifications Standards for history and architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.

Professional Activities

- Pasadena Heritage Board Member, 2008-2012
- Highland Park Heritage Trust, Board Member, 1996-1998
- West Hollywood Cultural Heritage Advisory Board, 1990-1994

Professional Experience

- Teresa Grimes | Historic Preservation, Principal, 2020 - Present
- GPA Consulting, Principal Architectural Historian, 2009-2020
- Christopher A. Joseph & Associates, Senior Architectural Historian, 2006-2009
- Teresa Grimes | Historic Preservation, Principal, 1999-2005, 1993-1994, 1991-1992
- Historic Resources Group, Architectural Historian, 1994-1998
- Getty Conservation Institute, Research Associate, 1992-1993
- Los Angeles Conservancy, Preservation Officer, 1988-1991

Appendix B – Figures

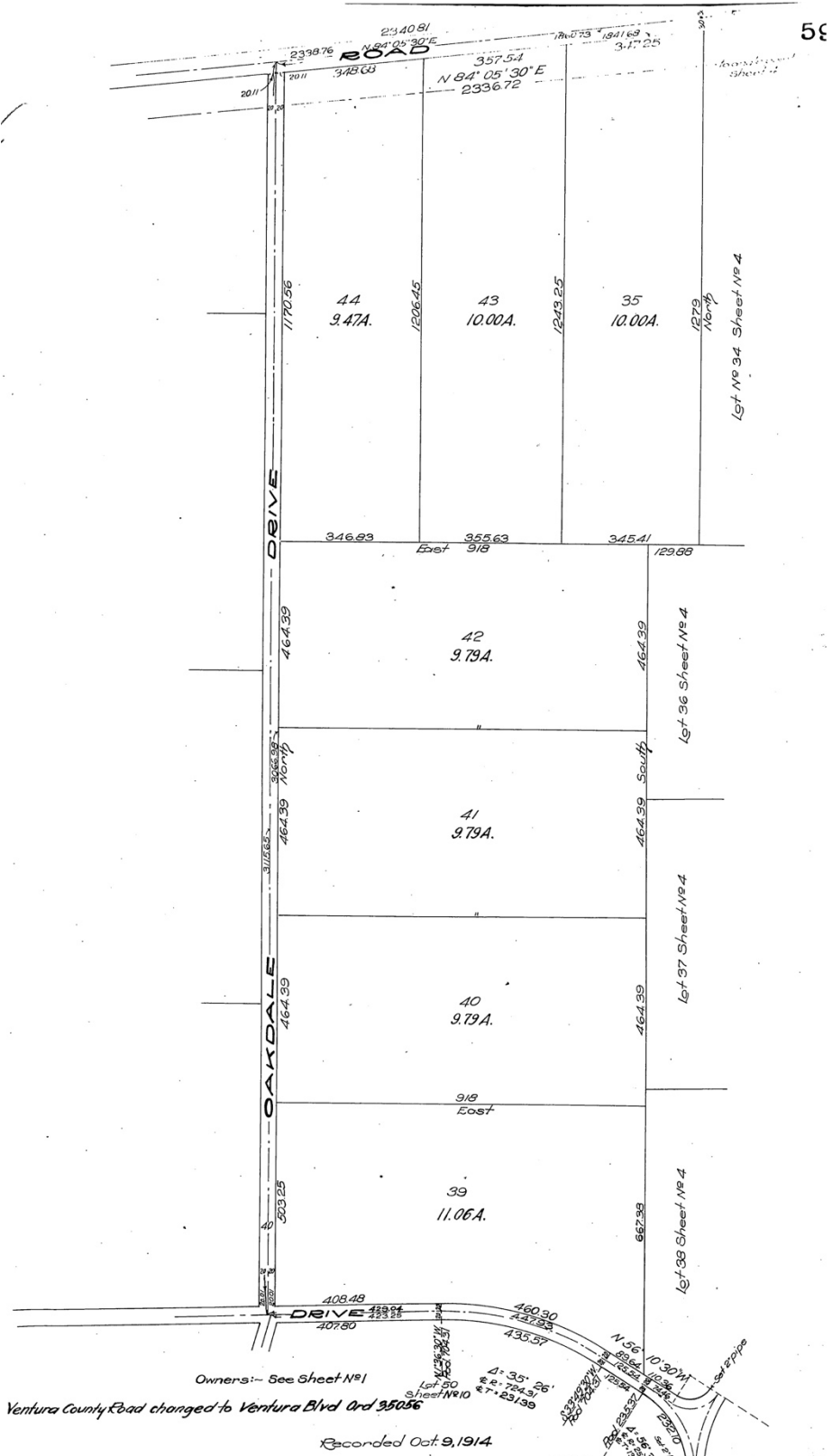


Figure 4: Lots purchased by H.R. Bristol Sr. within Tract No. 2605.



Figure 5: 1928 aerial photograph, UCSB Geospatial Collection, approximate boundary of Project Site outlined in red. Note citrus trees are planted, but no buildings or structures are present.

TRACT N^o 10515

154442

IN THE CITY OF LOS ANGELES

Being a Subdivision of
 Lots 39, 40, 41, 42, 43, 44 & 35 of Tract N^o 2605 as per map recorded in Book
 27 p. 35 et seq. Records of Los Angeles County, and that portion of Oakdale
 Drive as vacated by Ordinance N^o 64344 of the City of Los Angeles.

Reburn & Bowen
 Engineers
 1929

I, J. G. Morgan hereby certify that I am a Civil Engineer and
 that this map consisting of 1 sheet correctly represents a survey made under my
 supervision in November 1928 and that all of the monuments shown hereon
 actually exist and their positions are correctly shown.

Subscribed and sworn to before me this 1st day of April 1929.

The bearing of Oakdale Drive as shown on map of Tract N^o 8812, recorded in
 Map Book 180 p. 31-36, was taken as the basis of bearings shown upon this map.

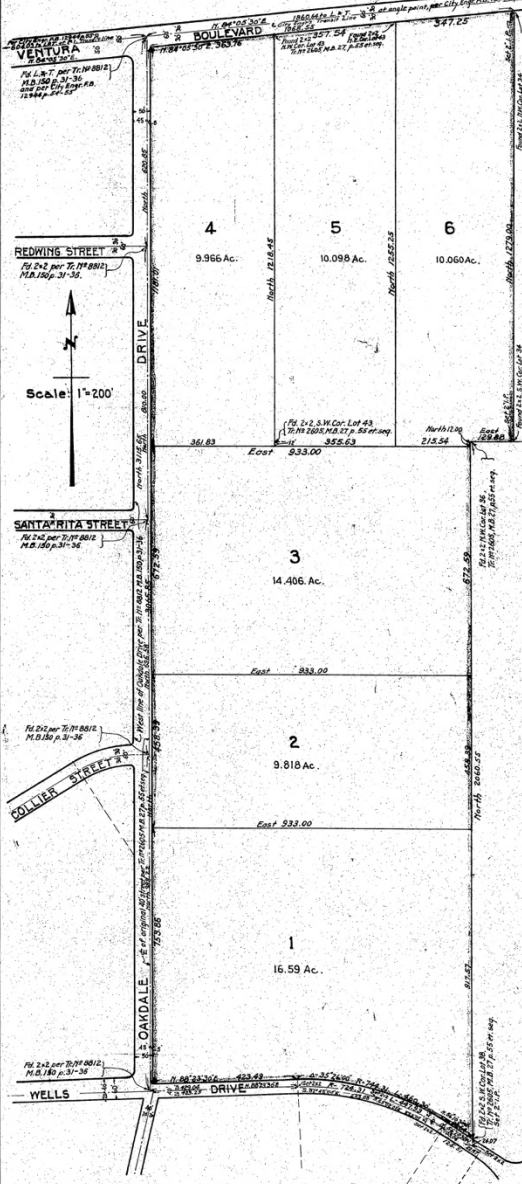
We hereby certify that we are the owners of or interested in the land
 included within the subdivision shown on the annexed map and that we are the only
 persons whose consent is necessary to pass a clear title to said land and we consent
 to the making of said map and subdivision as shown within the colored border line.

Paul J. Howard
Lindley F. Boltwell
Samuel F. Boltwell
Nels Nelson
Myra L. Boltwell
Anette K. Nelson

STATE OF CALIFORNIA)
 COUNTY OF LOS ANGELES)
 On this 19th day of MARCH in the year 1929 before me
CLARENCE F. SWEET a Notary Public in and for the County of Los Angeles State of
 California residing therein duly commissioned and sworn personally appeared
 Paul J. Howard Lindley F. Boltwell Samuel F. Boltwell Nels Nelson
 Alaseba Howard Marion S. Boltwell Myra L. Boltwell Anette K. Nelson

known to me to be the persons whose names are subscribed to the within instrument and
 acknowledged to me that they executed the same. In Witness whereof I have hereunto set my
 hand and affixed my official seal the day and year in this certificate first above written.

STATE OF CALIFORNIA)
 COUNTY OF LOS ANGELES)
 On this 21st day of MARCH in the year 1929 before me
VICTOR H. HENDRICK a Notary Public in and for said County of Los Angeles State of
 California residing therein duly commissioned and sworn personally appeared
 Lewis C. Spieess, Jr. Henry R. Bristol, Jr. and Lina L. Shaw
 known to me to be the Executors of the estate of Henry R. Bristol, Sr. deceased and acknow-
 ledged to me that pursuant to an order of the Superior Court of the State of California in and for the
 County of Los Angeles in Case N^o 94754, they signed and executed the within instrument on behalf of
 said estate. In Witness whereof, I have hereunto set my hand and affixed my official seal
 the day and year in this certificate first above written.



RECORD
 AUG 9 1929
 10515
 500

1000⁰⁰
 10515
 Tract No.
Duez Robinson
 Aug. 9, 1929
J. W. Brown

TRACT NO. 10515
 27th March 9
Agust. Roex Dominguez
 City
 John C. Shaw
 July 26th 9
 11 June 29
Sgt. Henry

Figure 6: Tract Map No. 10515



Figure 7: 1940 aerial photograph, UCSB Geospatial Collection, approximate boundary of Project Site outlined in red. Note citrus trees are planted, driveway cuts through the middle of the property, the house is on the south side of the driveway, and there are various buildings and structures on the southeast side of the Project Site.



Figure 8: 1944 aerial photograph, UCSB Geospatial Collection, approximate boundary of Project Site outlined in red. Note the Project Site remained unaltered from 1940.



Figure 9: 1947 aerial photograph, NETR Historic Aerials.com, approximate boundary of Project Site outlined in red. Note the construction of storage building for the car collection on east.



Figure 10: 1952 aerial photograph, NETR Historic Aerials.com, approximate boundary of Project Site outlined in red. Note the structure and buildings that once stood on the southeast are gone.



Figure 11: 1960 aerial photograph, UCSB Geospatial Collection, approximate boundary of Project Site outlined in red. Note the garage and tool shed are present, but the citrus trees are beginning to fade.



Figure 12: 1964 NETR Historic Aerials.com, approximate boundary of Project Site outlined in red. Note the construction of the north storage buildings and the citrus trees are continuing to fade.

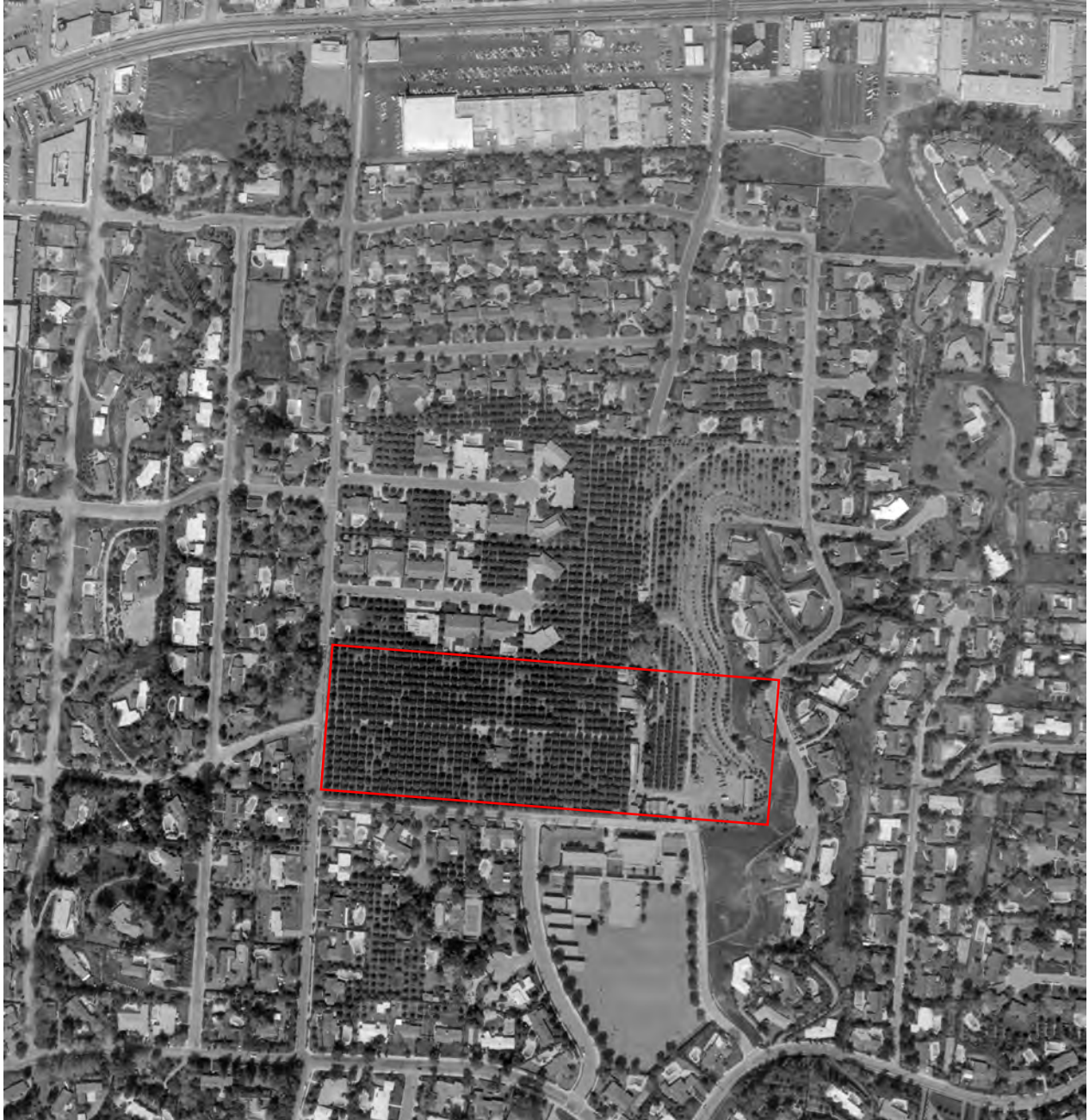


Figure 13: 1971 aerial photograph, UCSB Geospatial Collection, approximate boundary of Project Site outlined in red. Note the property remained unaltered from 1964.



Figure 14: 1978 NETR Historic Aerials.com, approximate boundary of Project Site outlined in red. Note the construction of the train station and shed and the citrus trees are continuing to fade.



Figure 15: 1980 NCTR Historic Aerials.com, approximate boundary of Project Site outlined in red. Note the citrus trees are essentially gone.



Figure 16: 1985 NETR Historic Aerials.com, approximate boundary of Project Site outlined in red. Note the citrus trees have been replanted.



Figure 17: July 2022 view of Project Site looking east down driveway.



Figure 18: July 2022 view of house on Project Site looking south toward primary (north) facade.



Figure 19: July 2022 view of multi-purpose building on Project Site looking southwest toward east facade.



Figure 20: July 2022 view of train station on Project Site looking southeast from multi-purpose building.



Figure 21: July 2022 view of train station on Project Site looking southwest from train shed.



Figure 22: July 2022 view of train storage shed on Project Site looking north.



Figure 23: July 2022 view of storage building on Project Site looking northeast toward south facade.



Figure 24: July 2022 view of storage buildings in southeastern portion of Project Site looking west.



Figure 25: July 2022 view of storage building in easternmost portion of Project Site looking northeast.

Appendix C – 2022 DPR Forms

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

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 1 of 17 *Resource Name or #: (Assigned by recorder) 5300 Oakdale Avenue, Los Angeles

P1. Other Identifier: Bothwell Ranch

*P2. Location: Not for Publication Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad _____ Date _____ T _____; R _____; _____ of _____ of Sec _____; _____ B.M.

c. Address 5300 Oakdale Avenue City Los Angeles Zip 91356

d. UTM: (Give more than one for large and/or linear resources) Zone _____, _____ mE/ _____ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

Assessor Parcel Numbers 2164-008-001; 2164-008-005, 2164-008-006, and 2164-008-007.

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

The property is located at 5300 Oakdale Avenue in the Encino - Tarzana Community Plan Area of the City of Los Angeles. It is commonly known as Bothwell Ranch and includes a single-family house, grove, and variety of ancillary buildings. The approximately 14-acre property is located in a RA-1 Zone and is surrounded single-family residential neighborhoods. Directly south of the property on Collier Street is the CHIME Institute's Schwarzenegger Community School.

*P3b. Resource Attributes: (List attributes and codes) HP2, HP33

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

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



P5b. Description of Photo: (view, date, accession #) camera facing northwest, July 2022

*P6. Date Constructed/Age and

Source: Historic Prehistoric
 Both

Circa 1925 to Circa 1985
Historic Aerial Photographs

*P7. Owner and Address:

Helen A. Bothwell Trust

P.O. Box 1546

Alameda, CA 94501

*P8. Recorded by: (Name, affiliation, and address) Teresa Grimes

Historic Preservation
40 Arroyo Drive Unit 101,
Pasadena, CA 91105

*P9. Date Recorded: July 2022

*P10. Survey Type: (Describe)

Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")
5300 Oakdale Avenue, Los Angeles Historical Resource Technical Report, July 2022

*Attachments: NONE Location Map Continuation Sheet Building, Structure, and Object Record

Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record

Artifact Record Photograph Record Other (List): _____

Page 2 of 17

*NRHP Status Code **6Z**

*Resource Name or # (Assigned by recorder) 5300 Oakdale Avenue, Los Angeles

D1. Historic Name: Bothwell Ranch

D2. Common Name: Bothwell Ranch

*D3. **Detailed Description** (Discuss overall coherence of the district, its setting, visual characteristics, and minor features. List all elements of district.): The property is generally divided into western and eastern portions. The western portion is the larger of the two and includes APN 2164-008-001, which is 9.81 acres in size. The land is relatively flat and planted with evenly spaced citrus trees in rows with a north-south orientation. Bisecting the grove is a gravel driveway, which begins on Oakdale Avenue and terminates in a surface parking area on the eastern portion. The eastern portion includes APNs 2164-008-005, 006, and 007, which is 4.18 acres in size. The topography rises from west to east. In addition to the surface parking area, there are a variety of buildings and structures with citrus trees planted sporadically in the eastern portion. (Continued below.)

*D4. **Boundary Description** (Describe limits of district and attach map showing boundary and district elements.): The property is situated on the east side of Oakdale Avenue at the corner of Collier Street. It is approximately 14 acres in size and includes four Assessor Parcel Numbers: APN 2164-008-001 is Lot 2 of Tract No. 10515; APN 2164-008-005 is a portion of Lot 36 of Tract No. 2605; APN 2164-008-006 is a portion of Lot 37 of Tract No. 2605; and APN 2164-008-007 is a portion of Lots 36 and 37 of Tract No. 2605.

*D5. **Boundary Justification:** The boundary encompasses the area owned and operated by the Bothwell family from approximately 1929 to 2016. Property beyond this beyond historically owned by the family was excluded from the boundary because it has been subdivided for single-family houses.

D6. **Significance:** Theme Agriculture and Architecture Area Los Angeles
Period of Significance N/A Applicable Criteria N/A (Discuss district's importance in terms of its historical context as defined by theme, period of significance, and geographic scope. Also address the integrity of the district as a whole.)

The property is evaluated below using the eligibility standards from the Los Angeles Citywide Historic Context Statement. The most relevant contexts and themes for the evaluation of the property are the Agricultural Roots theme within the Industrial Development context and the Ranch House theme within the Architecture and Engineering context. The property is ineligible for listing in the National Register of Historic Places and California Register of Historical Resources and designation as a Los Angeles Historic-Cultural Monument for lack of significance. (Continued below.)

*D7. **References** (Give full citations including the names and addresses of any informants, where possible.):
(Continued below.)

*D8. **Evaluator:** Teresa Grimes **Date:** 8/24/22

Affiliation and Address: Teresa Grimes | Historic Preservation, 40 Arroyo Drive, Pasadena, CA 91105

*Resource Name or # (Assigned by recorder) 5300 Oakdale Avenue, Los Angeles

D1. Historic Name: Bothwell Ranch

D2. Common Name: Bothwell Ranch

D3. Description Continued:

On the south side of the driveway in the approximate center of the grove is a single-family house constructed in circa 1934. The house has a wood-framed structure and U-shaped configuration sheathed in channel rustic wood siding. The open end of the U faces south toward the backyard. The west wing of the U is two stories in height and covered by a hipped roof, the east wing is one-story in height and covered by a rear-facing gabled roof, and the connecting middle wing is one-story in height and covered by a side-facing gabled roof. The roofs have shallow overhanging eaves with exposed rafter tails. The primary (north) façade is organized asymmetrically. The main entrance is located in the middle wing within a projecting front porch. A projecting balcony extends along the second story of the west wing. Windows throughout the house are mostly multi-paned wood casements set in pairs. Similarly designed French doors open on to the balcony as well as the rear patio. Some wood windows have been replaced with vinyl and aluminum sliders. The front yard is separated from the driveway by a low brick garden wall. Brick is also used as a paving material for the walkways, front porch, and rear patio. The yard is fenced on all sides, vinyl picket on the front and chain link on the sides and rear.

At the northeastern corner of the grove is a two-story multi-purpose building constructed between 1952 and 1964. The first floor was used as a workshop and car storage, while the second floor as an office and caretaker's quarters. The building has a wood-framed structure with various components indicating it was constructed in phases. The roofs are mostly side-facing gables with overhanging eaves and exposed rafter tails. The exterior is clad with board-and-batten wood siding. The fenestration is irregular and the patches in the siding and variety of doors and windows suggest changes over time. There is an assortment of window sizes, types, and materials including wood awning and aluminum sliding sash. There are shed roof lean-tos on the north and south. The one on the north is enclosed with corrugated metal siding. South of the multi-purpose building are two water storage tanks.

East of the multi-purpose building is the train station and storage shed constructed around 1978. The station is a wood-framed structure with a T-shaped configuration covered by an intersecting gabled roof. The roof is characterized by overhanging eaves with exposed rafters. Board and batten wood siding clads most of the building, but the pattern changes on the west façade. The east façade appears to be the most intact with a wood paneled door and double-hung wood sash windows. Other windows include aluminum sliding sash. Attached to the west façade is a gabled roof lean-to that appears to have originally been freestanding. The storage shed is a crescent-shaped structure with a wood frame and corrugated metal roof.

At the southeastern corner of the grove is two-story building that was used for car storage. The building has a wood-framed structure, gabled roof, and long rectangular shape with a north-south orientation. The exterior, including the roof, is covered with sheets of corrugated metal; however, board and batten wood siding is visible in the gable face of the north

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*NRHP Status Code 6Z

*Resource Name or # (Assigned by recorder) 5300 Oakdale Avenue, Los Angeles

D1. Historic Name: Bothwell Ranch

D2. Common Name: Bothwell Ranch

façade. There is a car ramp on the south leading to large sliding doors on the second story.

Further southeast is another water storage tank and cluster of corrugated metal sheds.

At the easternmost side of the property is another car storage building two-stories in height. Constructed in circa 1947, the building has a wood-framed structure and long rectangular shape with a north-south orientation. The exterior, including the roof, is covered with sheets of corrugated metal. There are large swing doors along the first story of the west façade and four single-paned windows spaced evenly along the second story. There is a car ramp at the south end leading to large sliding doors on the second story.

D6. Significance Continued:

NATIONAL REGISTER OF HISTORIC PLACES

Criterion A

To be eligible for listing in the National Register under Criterion A, a property must have a direct association with events that have made a significant contribution to the broad patterns of our history. The context considered in the evaluation of eligibility under Criterion A was the history of agriculture, specifically the Cash Crops for Export sub-theme from the LACHCS.

The period of significance for the Cash Crops for Export sub-theme is 1870 to 1945, which coincides with the era of significant agricultural production in Los Angeles. The eligibility standards state that a grove should be "planted within the period of significance." As previously stated, the grove on the property was completely replaced between 1980 and 1985. Thus, it was not planted during the period of significance. The integrity considerations state that "original trees may have been replaced over time as their productivity decreased, as long as the historical configuration of trees is intact, and the majority of existing trees are mature." Thus, a grove could still be considered significant if some of the trees have been replaced. The 2012 SurveyLA evaluation of the property did not acknowledge the replacement of any, let alone, all of the trees. Therefore, it appears to have been based upon the presumption that the grove dated to the 1920s, not the 1980s.

SurveyLA also identified the orange grove at the southeast corner of the California State University, Northridge (CSUN) campus. The 5-acre grove has 400 Valencia orange trees. While the university was established in 1958, the grove dates to the early 1940s. It is unknown if the grove was ever used as a commercial growing operation since its existence prior to the university was very short lived. According to CSUN, more than 100 trees have been replaced and replanted since 2008. The SurveyLA evaluation recognized that "some of the grove's original trees have been removed and replaced in-kind." Therefore, the eligibility standards and integrity considerations expect a

Page 5 of 17

*NRHP Status Code 6Z

*Resource Name or # (Assigned by recorder) 5300 Oakdale Avenue, Los Angeles

D1. Historic Name: Bothwell Ranch

D2. Common Name: Bothwell Ranch

grove to be planted between 1870 and 1945 and allow for selective but not comprehensive tree replacement.

The Orcutt Ranch Horticulture Center in Canoga Park is another example of a property in the City of Los Angeles with a citrus grove. Orcutt Ranch is designated HCM No. 31, was determined eligible for listing in the National Register through the Section 106 review process and is listed in the California Register. The property was principally recognized for its association with William Orcutt, although it appears to meet the eligibility standards for the Cash Crops for Export sub-theme. Orcutt was one of California's early oil pioneers who cemented his place in Los Angeles history with the discovery of prehistoric fossils at the La Brea Tar Pits. The 24-acre property was his vacation home. Orcutt planted orange trees on the property in the 1920s and served as head of the Canoga Park Citrus Association. Six acres of orange trees remain on the property.¹

There are no groves or orchards of any kind in Los Angeles County listed in the National Register in the context of agriculture; however, 12 examples are listed on the NPS Digital Archive. In most cases, the grove/orchard is associated with an individual or company that played a significant role in the history of agriculture. Agricultural properties listed in the National Register are also significant as early examples of farming and/or settlement in a region. The Berwick Manor and Orchard in Carmel Valley appears to be the only example of the type in California. The property was purchased by Edward Berwick in 1869 and originally consisted of 120 acres. Berwick was a noted agriculturalist who experimented with fruit growing. His farm was a model of its type and the pear he developed there became world renowned. Berwick is credited as the first person to raise winter pears on a commercial scale in the United States. The property is now 29-acres and is the only intact farmstead remaining from the period.²

The property does not meet the eligibility standards for the Cash Crops for Export sub-theme and is not comparable to other properties listed in the National Register in the context of agriculture. The property is not associated with a prominent company, is not associated with any scientific advancements in citriculture, and is not an early or important example of its type. The grove was originally planted in the early 1920s and was merely part of a trend that was already well established. The grove was entirely replaced between 1980 and 1985 and has not been managed or operated for commercial purposes since 2016. For all the reasons outlined above, the property does not appear to be significant under Criterion A.

¹ The City of Los Angeles designated the property LAHCM No. 31 in 1965 and opened the area to residents four years later.

² "Berwick Manor & Orchard," National Register of Historic Places Nomination Form, November 17, 1977.

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Criterion B

To be eligible for listing under Criterion B, a property must be associated with the lives of persons significant in our past. Several steps are involved in determining whether a property is significant under Criterion B. First, the person must be significant within a historic context. Second, the property must be associated with the person's productive life. Finally, the property must be compared with other associated properties to identify the best representation of the person's historic contributions.³

From 1929 to 1986, the property was owned and occupied by Lindley F. Bothwell and his family. No evidence was found indicating that he was significant within a historic context. While he appears to have been a successful businessman who was active in the community, research did not reveal any important contributions to the history of agriculture. Bothwell was one of many individuals who moved to the San Fernando Valley and worked in the citrus industry during the early part of the twentieth century. The completion of the Los Angeles-Owens River Aqueduct in 1913 provided a reliable supply of water. In the San Fernando Valley, acreage irrigated through artificial means grew 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.⁴

When Bothwell purchased the property in 1929, the land was already planted with citrus trees. He was not among the pioneers of the San Fernando Valley or among the largest land holders. At one time the grove was 20 acres but reduced before and after his death to 14 acres.⁵ His own property was relatively small for a commercial grove, and his main business appears to have been managing other groves. The claim in newspaper articles that he managed groves throughout the state could not be confirmed.⁶ As groves were replaced with subdivisions, he developed a mail-order fruit business. It appears to have been a profitable but modest enterprise compared with companies like Mission Pak, a popular brand founded by George C. Page in

³ Patrick Andrus and Rebecca Shrimpton, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: U.S. Department of the Interior, 1997), 14-15.

⁴ Kevin Roderick, *The San Fernando Valley: America's Suburb* (Los Angeles: Los Angeles Times Books, 2002), 71.

⁵ Tract No. 30266 was previously Lot 3 of Tract No. 10515. It was sold and subdivided in 1965 by John Lawton and Mary Bothwell Lawton and Jordan Johnson and Elizabeth Bothwell Johnson. Mary was Lindley's younger sister. Helen Ann Bothwell sold 3.94 acres on the northeast in 1988.

⁶ "He had his own soil and bacteriological laboratory, providing pruning, spraying, and other technical assistance to some 40 ranches from San Francisco to the Mexican border." Jack Birkinshaw, "Agriculture, Once King, All but Finished in Valley," *Los Angeles Times*, November 28, 1978. Other articles claimed he owned or managed 34 ranches. Still other articles stated he was one of the ten largest citrus growers in the United States by 1943 and also raised cattle on a grand scale.

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1917.

Bothwell's automobile collection was undoubtedly his greatest achievement. He purchased his first antique car when he was still in college and began collecting others in the 1930s. Enthusiasts like Bothwell began collecting cars almost as soon as they were invented. Kirk Gibson and George Waterman, for example, had assembled a large enough collection by 1931 to establish a museum called Musée des Vénérables. The collection included 47 vehicles that ranged from an 1896 Waverly to 1913 Fiat.⁷ Bothwell's collection by all accounts was not just large, but included important examples from Austro-Daimler, Buick, Cadillac, Ford, Hudson, National, Packard, and Pope-Hartford, among others. After the death of Helen Ann Bothwell in 2016, the collection was sold.⁸

Even if there was a context developed for this topic and Bothwell was considered a significant figure, the importance would be attached to the collection, not the buildings in which the collection was stored. The storage buildings on the property are utilitarian in design and do not express the collection they once, but no longer contain.

The property is not closely associated with any other individuals, significant or otherwise. Therefore, the property does not appear to be significant under Criterion B.

Criterion C

To be eligible for listing under Criterion C, a property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction.

Type, Period, or Method of Construction

A type, period, or method of construction refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. This aspect of Criterion C encompasses all architectural styles and construction practices. A building or structure is eligible as an architectural type specimen if it is an important example of construction practices from a particular period in history.⁹

Research did not yield any results indicating that the house on the property was considered an important work during its time or in subsequent decades. The house possesses some of the characteristics of Traditional Ranch style,

⁷ Rick Carey, "The Founding Fathers of Car Collecting: Waterman & Gibson," *Haggerty*, May 13, 2022.

⁸ Kurt Ernst, "Bonhams to offer 50 cars from the Bothwell Collection in November sale," *Hemmings*, October 16, 2017.

⁹ *National Register Bulletin #15*, 17-18.

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but not enough to make it a true representation of the style. It is lacking in the rustic appearance exhibited in finer examples of the style, which often have wood shake roofs and rambling plans. It is also lacking in elements from vernacular nineteenth century buildings like dovecotes, Dutch doors, and shutters. Although the house has French doors, a front porch, and a rear patio, it is rather disconnected from the outdoors. Additionally, the house did not involve any novel or noteworthy construction techniques, so it does not appear to be significant for embodying the distinctive characteristics of a method of construction. It is an ordinary example of a wood-framed structure with a concrete slab foundation.

Work of a Master

A master is a figure of generally recognized greatness in a field of design or construction such as architecture, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The property must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft. A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect.¹⁰

The architect of the house on the property is unknown as the construction of the building was not published and the original permit for the building was not found. As it is a typical example of the type, period, and method of construction there is no reason to believe it is the work of a master.

High Artistic Values

The possession of high artistic values refers to a property's articulation of a particular concept of design so fully that it expresses an aesthetic ideal.¹¹ A property does not possess high artistic values, however, if it does not express aesthetic ideals or design concepts more fully than other properties of its type.¹²

A property eligible under this aspect of Criterion C would need to possess ornamentation and detail to lend it high artistic value, which the house on the property does not. Rather, it exhibits the basic features of Traditional Ranch style and does not include the craftsmanship or detailed handwork found in finer examples of the style such as brick, stone, and wood features like chimneys, shingles, shutters, Dutch doors, carved rafter tails, and carved bargeboards.

Distinguishable Entity

The last aspect of Criterion C, representing a significant and

¹⁰ Ibid., 20.

¹¹ *National Register Bulletin* #15, 20.

¹² Ibid.

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distinguishable entity whose components lack individual distinction, refers to historic districts. A district must be significant, as well as being an identifiable entity.¹³

The area in which the property is located was not identified as a potential district by SurveyLA. During the field inspection conducted for this report, it was determined that there were not enough properties with shared physical characteristics or historical associations in the area to form a potential district. Therefore, the property is being evaluated individually.

While the property could be classified as a district because it is an identifiable entity with a variety of resources, as discussed above and below, it is not significant under Criterion A, B, other aspects of C, or D. Additionally, districts usually reflect on principal activity such as a ranch. But in this case, many of the buildings on the property were constructed as storage for Bothwell's car collection.

Conclusion

For all the reasons outlined above, the property does not appear to be significant under Criterion C.

Criterion D

A property may be eligible under Criterion D if it has yielded, or may be likely to yield, information important in prehistory or history. This criterion generally applies to archaeological sites but may apply to buildings, structures, and objects in instances where the property may contain important information about such topics as construction techniques or human activity. In any case, the property must be the principal source of information. This is unlikely to be true for the property because it did not involve the use of any novel or noteworthy construction techniques. Furthermore, research did not indicate the property to have the potential to yield information about human activity. Therefore, the property does not appear to be significant under Criterion D.

Integrity

To be eligible for listing in the National Register, properties must retain their physical integrity from the period of significance. In the case of architecturally significant properties, the period of significance is normally the date of construction. For historically significant properties, the period of significance is usually measured by the length of the associations. As the property is not significant under any of the National Register criteria, it has no period of significance, and an assessment of its integrity is not required.

¹³ Ibid., 5.

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Conclusion

The field inspection and research conducted for this report indicate that the property lacks historical significance and architectural distinction. Therefore, it does not appear to be eligible for listing in the National Register under any criteria.

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register was modeled on the National Register. The criteria for eligibility for listing in the California Register are virtually the same as the National Register. Therefore, the property appears to be ineligible for listing in the California Register for the same reasons noted above.

LOS ANGELES HISTORIC-CULTURAL MONUMENTS

On June 29, 2022, the Los Angeles City Council denied a HCM nomination for the property. The City Council determined that the Project Site did not meet the criteria for significance in the Los Angeles Cultural Heritage Ordinance, which are essentially the same as criteria A/1, B/2, and C/3 for listing in the National and California Registers. Therefore, the property is ineligible for HCM designation for the same reasons outlined above.

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Figure 1: July 2022 view of property looking east down driveway.



Figure 2: July 2022 view of house looking south toward primary (north) façade.

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Figure 3: July 2022 view of multi-purpose building looking southeast toward east façade.



Figure 4: July 2022 view of train station looking southeast from multi-purpose building.

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Figure 5: July 2022 view of train station looking southwest from train shed.



Figure 6: July 2022 view of train shed looking north.

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Figure 7: July 2022 view of storage building looking northeast toward south façade.



Figure 8: July 2022 view of storage buildings in southwestern portion of property looking west.

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Figure 9: July 2022 view of storage building in easternmost portion of property looking northeast.

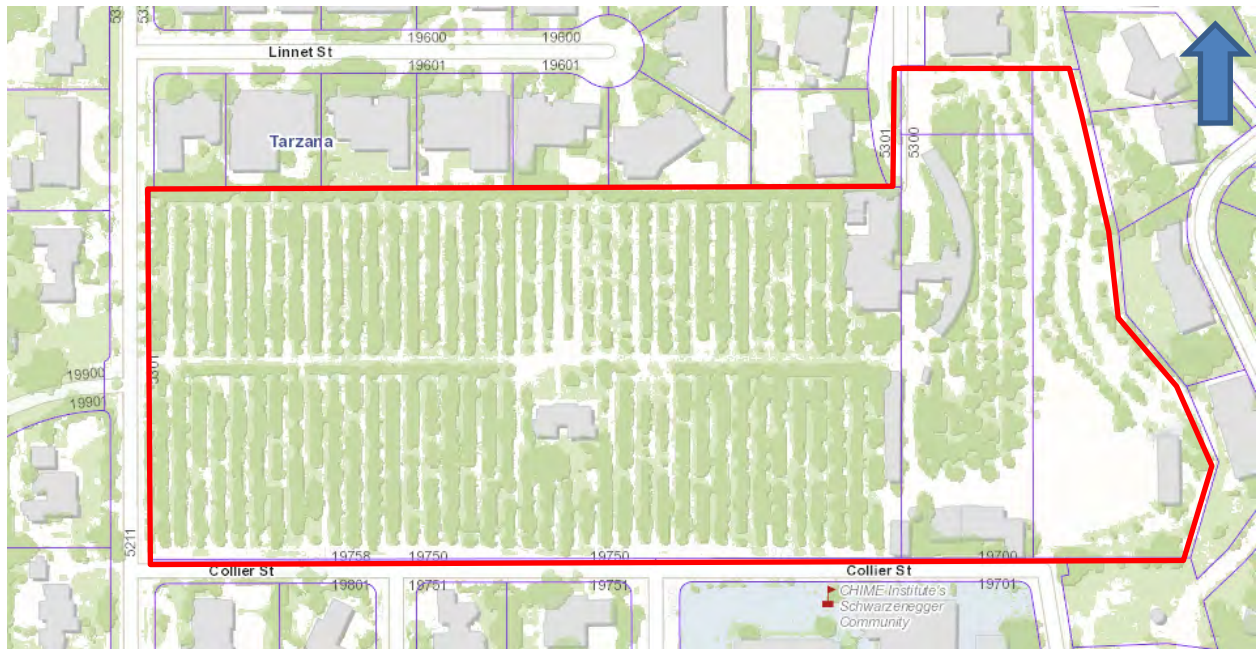


Exhibit D

MEMORANDUM

Date: May 12, 2022
For: Erik Pfahler
Bornstein Enterprises
Project: 5300 Oakdale Avenue, Los Angeles
Subject: HCM Nomination Peer Review

INTRODUCTION

This memorandum presents the results of a peer review of the Historic-Cultural Monument (HCM) nomination for the property at 5300 Oakdale Avenue in the Encino – Tarzana Community Plan Area of the City of Los Angeles. The property is approximately 14 acres in size and includes four Assessor Parcel Numbers summarized below:

- APN 2164-008-001 is Lot 2 of Tract No. 10515 (9.81 acres)
- APN 2164-008-005 is a portion of Lot 36 of Tract No. 2605 (0.30 acres)
- APN 2164-008-006 is a portion of Lot 37 of Tract No. 2605 (1.96 acres)
- APN 2164-008-007 is a portion of Lots 36 and 37 of Tract No. 2605 (1.92 acres)

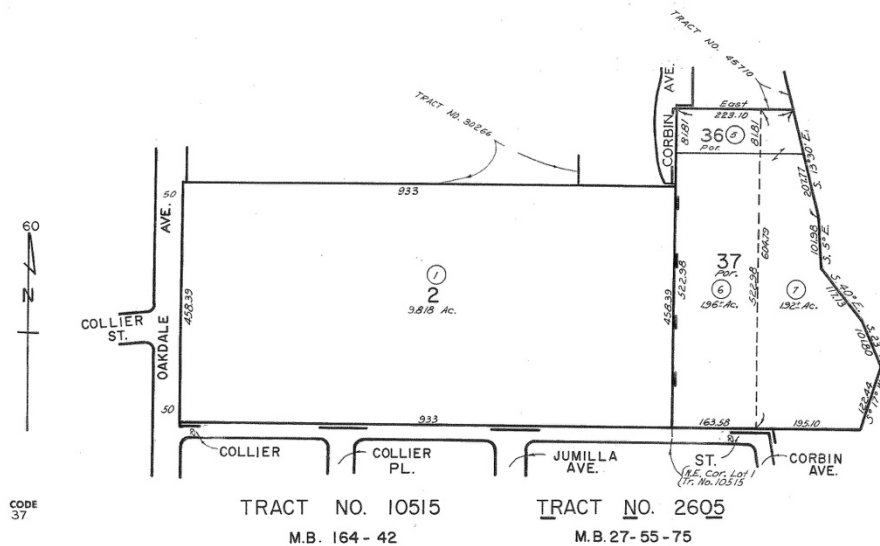


Figure 1: Assessor Parcel Map

APN 2164-008-001 is occupied by a single-family house and an orchard; APN 2164-008-007 is occupied by a storage building; and APN 2164-008-006 is occupied by a variety of ancillary buildings. The property is commonly known as the Bothwell Ranch, so named for Lindley Fowler Bothwell (1901-1986), the patriarch of the family who owns the property to this day.

Grimes Peer Review Memorandum

In 2012, the property was identified by SurveyLA as appearing eligible for national, state, and local landmark designation “as one of the last remaining family-owned commercial citrus groves in the San Fernando Valley.” In 2019, an HCM nomination was initiated by Council District 3. The Office of Historic Resources (OHR) prepared the nomination for the property, which was reviewed and recommended for designation by the Cultural Heritage Commission on November 7, 2019. The City Council has not yet acted on the pending nomination.

Pursuant to your request, I have reviewed the nomination for methodology, accuracy, and completeness according to best practices in the field of historic preservation. In preparing this memorandum I inspected the property, conducted research, and applied the applicable eligibility standards from the *Los Angeles Citywide Historic Context Statement (LACHCS)*.

SURVEYLA

In 2012, the property was identified and evaluated by SurveyLA in the Agricultural Roots Theme of the Industrial Development Context of the *LACHCS*. The eligibility standards for the grove/orchard property type are found in Table 1 below.

TABLE 1: GROVE/ORCHARD
Context: Industrial Development, 1850-1980
Theme: Agricultural Roots, 1850-1965
Subtheme: Cash Crops for Export, 1870-1945
Property Type, Grove/Orchard
Eligibility Standards
<ul style="list-style-type: none">• Planted within the period of significance• Retains ability to convey historic association from the period of significance• Retains most of the essential physical features from the period of significance
Character-Defining/Associative Features
<ul style="list-style-type: none">• Concentration of numerous mature citrus or deciduous trees planted with ordered spacing characteristic of cultivated grove or orchard• Is large enough to convey a historically rural setting• Typically associated with a least one additional agricultural building or landscape feature (may include a farm/ranch house; outbuilding, land, cooperative association office, or packing house)
Integrity Considerations
<ul style="list-style-type: none">• Should retain integrity of Location, Setting, Feeling, and Association• Original trees may have been replaced over time as their productivity decreased, as long as the historical configuration of trees is intact, and the majority of existing trees are mature

The summary statement of significance from SurveyLA is as follows:

As one of the last remaining commercial citrus orchards in the San Fernando Valley, Bothwell Ranch is significant as representing the once vast agriculture of the San Fernando Valley. Other ranches were driven out of the area by rising land value during the housing boom after World War II. Without enough land to farm or raise livestock, farmers were unable to continue making a viable living. The Bothwell Ranch was purchased in 1926 by Lindley Bothwell. At that time, the citrus orchard was about six years old and covered 100 acres. The period of significance for the ranch begins in 1926, the date of its initial purchase by the Bothwell family for commercial ranching purposes. Ann Bothwell continues to operate the ranch to the present day. Lindley Bothwell, who received a degree in agriculture from Oregon State University in 1926, came to own or manage over 30 ranches across southern California. He also started a business that provided technical assistance to other growers, but research did not reveal the name of this company.

SurveyLA records do not include footnotes or a bibliography, so the sources of the information contained in the statement above are unknown. Based upon the eligibility standards, the SurveyLA evaluators apparently presumed the orchard was planted in 1920, which is within the period of significance (1870 to 1945) for the property type. As discussed below, the older orchard was removed after 1980 (see Figure 13) and replaced in its entirety by 1985 (see Figure 14).

LOS ANGELES CULTURAL HERITAGE ORDINANCE

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). The Commission is comprised of five citizens, appointed by the mayor who have exhibited knowledge of Los Angeles history, culture and architecture. A monument is any site, building, or structure of particular historic or cultural significance to the City of Los Angeles and may be designated if it meets at least one of the following criteria:

1. The proposed HCM 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; or
2. The proposed HCM is associated with the lives of historic personages important to national, state, city, or local history; or
3. The proposed HCM 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.¹

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

¹ Los Angeles Administrative Code § 22.171.7.

HCM NOMINATION SUMMARY

The HCM nomination essentially picked up where the SurveyLA evaluation left off. While SurveyLA was conducted from the public right-of-way and involved minimal property-specific research, OHR staff obtained access to the property and performed more research. By the time the nomination was prepared; however, the orchard was no longer operational. The nomination asserts the property is eligible for HCM designation under Criterion 1 of the Ordinance because it exemplifies significant contributions to the broad economic history of the San Fernando Valley. The statement of significance is as follows:

The subject property, originally part of a 100-acre citrus orchard, was purchased by Lindley Bothwell in 1926. At that time, the subject property was about six years old and covered 30 acres. Over time, the property was subdivided and sections to the north of the current boundaries were sold for residential development: in 1965 (Santa Rita and Linnet Streets), 1978 (west side of Corbin Avenue), and 1988 (east side of Corbin Avenue and south side of Wellington Lane). The other portions of the original 100-acre orchard property, still in use for citrus farming in 1947, have been entirely replaced by single-family homes and retail, though some associated structures still exist.

In addition to being a working orange grove, Lindley Bothwell and his wife, Helen Ann resided at the property. Bothwell, who came to own or manage over 30 ranches across Southern California, ran a business managing and providing services for other citrus orchards in the area and served for over 60 years as the coach of the University of Southern California Song Girls and Yell Leaders.

The Bothwells were also active in philanthropy and collected vintage cars, amassing a substantial and highly regarded collection of early automobiles. In addition, Lindley Bothwell was a train aficionado and installed a rail line, train storage shed, and a train station on the grounds of the subject property to accompany an 1890s light rail locomotive and cars. Following Ann Bothwell's death in 2016, the property ceased commercial operation and is currently for sale.

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

Although more research was conducted, there are no footnotes in the nomination. The bibliography is limited to the SurveyLA Survey Reports for two Community Plan Areas in the San Fernando Valley, the LACHCS for the Industrial Development Context, and a few newspaper articles published between 1978 and 2019. The nomination is not based upon any scholarly or primary sources. Most of the information in the statement of significance seems to be based upon an article in the *Los Angeles Times* (November 26, 1978) in which Bothwell was interviewed about the suburbanization of the San Fernando Valley. The nomination is not asserting that Bothwell was a significant person in national, state, or local history under Criterion 2. Thus, the new information about his car collection and extracurricular activities are irrelevant to the argument for HCM designation under Criterion 1.

The descriptive section of the nomination explained that there are no building permit records for the property. Some of the buildings are also mis-labeled and do not reflect the historic or current uses. The dates of construction were based upon a comparative analysis of aerial photographs. "It appears that at least the single-family dwelling, the storage building, and the garage and tool

shop were constructed prior to 1947, and the train storage shed was built between 1967 and 1989.” However, the analysis was limited to the aerial photographs included in an article in the *New York Times* (July 11, 2019) about the potential sale of the property. This article did not include the full array of aerial photographs available using online sources (see Figures 4-14).

DEVELOPMENT HISTORY

The following development history of the property was based upon additional research, which is presented in chronological order in Table 2 with citations. The modern origins of the property can be traced to the subdivision of Tract No. 2605 in 1914 by the Title Insurance and Trust Company. At that time, Ventura Boulevard was still called Ventura County Road. Most of the existing side streets, including Oakdale Avenue, had been laid out. Sometime after 1914, Henry R. Bristol, Sr. (1855-1928) purchased the lots (Lots 35, 39, 40, 41, 42, 43, and 44, see Figure 2) along Oakdale Avenue from Ventura Boulevard on the north to Wells Drive on the south. Bristol and his wife, Ella had been living in Santa Ana since 1882.² He was a pharmacist as was his father before him.³ By 1916, he had sold his business and the family had moved to the San Fernando Valley. The location of their home was consistently described as Owensmouth in contemporary sources but is nevertheless the subject property.⁴ There are no sources documenting that the orchard was ever 100 acres in size or had been planted with orange trees in 1920. The orchard was more likely 70 acres in size, which is the combined acreage of Tract No.2605 (see Figure 2). The earliest available aerial photograph of the property dates from 1928 (see Figure 4). The orchard was present by this time, so it could have been planted in 1920, though there is no definitive evidence of a planting date. The photograph also depicts two clusters of buildings, one on the north with a driveway from Ventura Boulevard and one on the south with access from Wells Drive. The cluster on the north included the home of Henry and Ella Bristol, Sr. In the 1924, they are listed in the City Directory at 19730 Ventura Boulevard. The buildings have been demolished, and the property is currently occupied by a shopping center. The cluster on the south included the home of their eldest son, Henry Bristol, Jr. The house at 19801 W. Wells Drive survives. A 1922 permit for additions and alterations to an existing house documents that it was owned by Henry Bristol Jr.⁵

Ella Bristol died in 1924 and Henry, Sr. in 1928. In 1926, Henry Bristol, Sr. and Samuel and Myra Bothwell agreed to a future acquisition of a portion of Lots 40 and 41 of Tract No. 2605 owned by Bristol.⁶ In 1929, the heirs of the Bristol estate sold the remaining property to a group of buyers including Samuel, Myra, Lindley, and Marion Bothwell; Paul J. Howard and Alaseba Howard; and Nels and Anette K. Nelson (see Figure 3). Thus, the reports that Bristol subdivided

² “Ella Bristol obituary,” *Santa Ana Register*, June 25, 1924.

³ “Bristol Avenue & H.R. Bristol,” O.C. History Roundup, accessed on April 12, 2022, <https://ochistorical.blogspot.com/2016/12/bristol-avenue-hr-bristol.html>

⁴ “Home Wedding,” *Santa Ana Register*, October 18, 1916.

⁵ 1922LA40447 H.R. Bristol 14 x 28 addition and 6 x 7 screen porch to house, Lot 39 of Tract 2605.

⁶ Quit Claim Deed recorded on February 17, 1930, between Citizens National Trust & Savings Bank of Los Angeles and Samuel and Myra Bothwell.

the property and that Bothwell purchased 20 or 30 acres in 1926 are not entirely accurate.⁷ Members of the Bothwell family ended up owning what became Lots 2 and 3 of Tract No. 10515, which is approximately 20 acres. The Howard family bought the former home of Henry Bristol Jr. on Wells Drive, which became Lot 1 of Tract No. 10515.⁸ Howard was in the nursery business and may have used the property as a weekend getaway as the family was still listed at 900 S. Rimpau Boulevard from 1930 and 1942.⁹

Lindley F. Bothwell married Marion Seale in 1927. In 1930, they were living in Beachwood Canyon, and he was working in the orange business.¹⁰ Thus, it appears that he owned the subject property which was already planted with orange trees but had not yet made the San Fernando Valley his home. The Los Angeles County Office of the Assessor estimates the date of construction of the house as 1934. This date is confirmed by the fact that Marion Seale Bothwell was registered to vote at this address. There are no scholarly sources on Bothwell's citrus business. The only contemporary source regarding Bothwell described him as an "agricultural adviser to film stars in the San Fernando Valley."¹¹ Bruce Bothwell recalled that his grandfather managed other citrus groves in the San Fernando Valley. He also remembered that oranges were not packed on the property, rather his grandfather was a member of the Sunkist Cooperative. The oranges from the property were picked and sent to a Sunkist plant in either Fillmore or Claremont where they were sorted, packed, and shipped. Another Bothwell venture was a fancy fruit gift box business much like Mission Pak, but smaller. While some of the fruit for the boxes was grown on the property, much was purchased from produce markets in Downtown.¹² Bothwell purchased a few acres of Lots 36 and 37 of Tract No. 2605 east of the orchard around 1940. By that time, Bothwell had constructed what appear to be garages, sheds, and a pergola type structure on APN 2164-008-006 (see Figure 5). These buildings appear to have supported his diverse businesses. Beginning in the 1940s, there are numerous sources that chronicle Bothwell's car collecting activities. In 1947, he constructed a storage shed for the collection on APN 2164-008-007, which had not been planted with orange trees (see Figure 7).¹³ This hobby grew into a business of leasing antique cars for film and television productions.

The long, rectangular shed present in the 1940 photograph was either removed or covered with trees in the 1947 photograph. The existing shed in this location was constructed by 1952 (see Figure 8). The HCM nomination inaccurately states that the garages and tool shop for the car collection were constructed prior to 1947. There were buildings in this location on the 1947 photograph; however, they are not the same as those on the 1960 photograph (see Figure 9). It is possible that these were the buildings destroyed by fire in 1949.¹⁴ The group of buildings on

⁷ Stephen A. Bristol Letter to the Editor, "Spec House Story Stirs Memories," *Los Angeles Times*, April 1, 1979.

⁸ Beginning in 1930 the Howards start to improve the property; 1930LA19021 P.J. Howard 11 x 24 addition to house Lot 1 of Tract 10515 and 1930LA05526 P.J. Howard private lounge for tennis court.

⁹ 1930 and 1940 U.S. Census; 1942 World War II Draft Registration Card.

¹⁰ 1930 U.S. Census.

¹¹ *San Francisco Examiner*, February 16, 1939.

¹² Teresa Grimes interview with Bruce Bothwell on April 20, 2022.

¹³ Los Angeles County Office of the Assessor and 1947 historic aerial photograph.

¹⁴ "Fire Destroys Antique Autos Used in Films," *Los Angeles Times*, February 5, 1949.

the north side of the road were constructed between 1952 and 1964 (see Figures 8, 9, and 10). Why they are described as “worker housing” in the HCM nomination is unclear; they are principally used for storage and workshop space. According to Bruce Bothwell, there was an apartment on the second floor for a caretaker.¹⁵ The train station and storage shed were constructed by 1978 (see Figure 12). The 1978 photograph also documents that the orchard was beginning to fade. There are numerous trees that had been removed. By 1980, the trees were virtually gone and by 1985 the orchard had been entirely replanted.

CONCLUSIONS AND RECOMMENDATIONS

Lindley and Marion Bothwell purchased the property in 1929, not 1926. The property they purchased had been part of a 70-acre, not 100-acre orchard. The property was not part of a vast orchard owned and operated by a significant company. Rather it was a relatively small family farm. As was custom with small citrus farmers, Bothwell was a member of a cooperative. Fruit was not sorted, packed, and shipped from the property. While Bothwell was no doubt a creative entrepreneur and successful businessman, no information was found indicating that he played a significant role in the history of agriculture in the San Fernando Valley. There are no permits for the construction of any of the buildings and structures on the property. Based upon a comparative analysis of aerial photographs, the estimated construction dates for the buildings, structures, and orchard are as follows: house (1934), storage building (1947), south shed (circa 1952), garages and tool shop (circa 1960), north workshop and storage buildings (circa 1952-1964), train station and shed (circa 1978), and orchard (circa 1985). The buildings and structures were used for a variety of purposes for Bothwell’s diverse businesses. While some were used to store farm equipment none could be accurately described as a packing house or worker housing.¹⁶ They were mostly related to his car and train collections and would not be considered character-defining features if the property was designated an HCM. APN 2164-008-007 was not historically part of the orchard and would also not be character-defining features if the property was designated.

Based upon this new information, the Bothwell Ranch does not appear to meet the eligibility standards for the grove/orchard property type in the *LACHCS*. The orchard was not planted within the period of significance, which ends in 1945. It was planted sometime between 1980 and 1985. The integrity considerations state “original trees may have been replaced over time,” which implies some, gradual tree replacement is acceptable— not wholesale replacement. Therefore, the property lacks integrity from the period of significance and cannot exemplify late nineteenth and early twentieth century citriculture.

I don’t recommend the HCM designation of the property. Designating a property based upon a popularly held but false belief would set a dangerous precedent. If nothing else, the nomination should be corrected based upon the additional information presented in this memorandum so the City Council can make an informed decision.

¹⁵ Teresa Grimes interview with Bruce Bothwell on April 20, 2022.

¹⁶ Ibid.

TABLE 2: CHRONOLOGICAL HISTORY OF THE PROPERTY		
Year	Event	Source (s)
1900	Henry Richard Bristol lives in Santa Ana with his wife, Ella and their four children. His occupation is druggist. He was born in Illinois in 1855.	U.S. Census, 1900, Ancestry.com
1902	Lindley Fowler Bothwell lives at 1997 Orchard Avenue with his parents Samuel Fowler Bothwell and Myra Lindley Bothwell. He was born in California in 1902.	U.S. Census, 1910, Ancestry.com
1910	H.R. Bristol, Sr. lives in Santa Ana with his wife, Ella and daughter, Marian. His occupation is not listed.	U.S. Census, 1910, Ancestry.com
1914	H.R. Bristol, Sr. buys 70 acres of Tract No. 2605.	Los Angeles Times, April 1, 1979 and Tract Map
1919-1924	L.F. Bothwell attends U.S.C.	U.S. School Yearbooks, Ancestry.com
1920	H.R. Bristol, Sr. lives on Ventura Road with his wife, Ella and son, Lawrence. His occupation is farmer. H.R. Bristol, Jr. lives on Wells Drive with his wife, Sue and their four children. His occupation is farmer.	U.S. Census, 1920, Ancestry.com
1920	L.F. Bothwell lives at 212 S. Ardmore Avenue with his parents and siblings.	U.S. Census, 1920, Ancestry.com
1921	L.F. Bothwell lives at 212 S. Ardmore Avenue with his parents and siblings.	1921 City Directory
1922	Lawrence Bristol dies.	Los Angeles Times, August 22, 1922
1924	L.F. Bothwell receives M.A. in History from U.S.C.	USC Digital Library
1924	H.R. Bristol Sr. lives with his wife Ella at 19730 Ventura Boulevard. His occupation is fruit grower.	1924 City Directory
1924	Ella Bristol dies.	Santa Ana Register, June 25, 1924
1926	H.R. Bristol Sr. agrees to sell Samuel and Myra Bothwell 20 acres of orange trees that were part of a 100-acre grove that was then six years old.	Quit Claim Deed, February 17, 1930 and Los Angeles Times November 26, 1978 <i>The HCM nomination appears to be based upon this 1978 article, but no original sources.</i>
1926	L.F. Bothwell graduates from Oregon Agricultural College, returns to Los Angeles, and buys an orange	https://osughost.imodules.com/s/resources/templ

Grimes Peer Review Memorandum

	grove. This was the start of a citrus empire that by 1943 had grown to 34 ranches, which he either owned or managed. At the time, he was considered by the U.S. Department of Agriculture to be one of the nation’s top-10 citrus farmers. He also had his own soil chemistry lab, served as an adviser to growers all over the southwest and was one of California’s leading cattle breeders. Home-based in the San Fernando Valley, his concerns stretched from San Bernardino to San Diego to Ventura. His professional affiliations included memberships in the American Society of Agronomy and the Society of Soil Scientists.	ates/login/index.aspx?gid=1&pgid=493 <i>This blog appears to be partially based upon the 1978 article in the LA Times. No primary sources could be found verifying any of these claims.</i>
1926	Marion Seale announces were engagement to L.F. Bothwell. She is attending Stanford University.	Stanford University Review, Vol. 27, No. 7
1927	L.F. Bothwell marries Marion Seale, who graduated in 1928.	https://osughost.imodules.com/s/resources/templates/login/index.aspx?gid=1&pgid=493 U.S. Marriage Index, Ancestry.com <i>Other sources confirmed that Seale graduated in 1927 – not 1928.</i>
1927	Marion Seale graduates for Stanford.	Oakland Tribune, May 17, 1953
1928	H.R. Bristol, Sr. dies.	U.S. Find a Grave Index, Ancestry.com
1928	The property is entirely planted with orange trees at this time. There is a collection of buildings with a driveway from Ventura Boulevard on the north (the home of H.R. Bristol, Sr.) and another collection of buildings with a driveway from Wells Drive on the south (the home of H.R. Bristol, Jr.) This house still stands at 19801 W. Wells Drive.	UCSB Geospatial Collection <i>The larger orange grove visible in the photograph is essentially the same as Tract No. 10515, which is approximately 70 acres.</i>
1929	Tract No. 10515 is subdivided from the estate of H.R. Bristol, Sr. The owners include Samuel, Myra, Lindley, and Marion Bothwell and Paul J. Howard and Alaseba Howard. The Howard family buys the former home of H.R. Bristol, Jr. on Wells Drive.	Tract Map, Los Angeles County Land Records <i>This may have been the actual date Bothwell purchased the property –</i>

Grimes Peer Review Memorandum

		<i>not 1926. The subdivision was approximately 70 acres.</i>
1930	L.F. Bothwell lives at 2327 (or 23274) Beachwood Drive with his wife Marion Seale Bothwell. His is a farmer in the orange business.	California Voter Registrations and U.S. Census, 1930, Ancestry.com
1930	H.R. Bristol, Jr. lives in Oregon with his family. His occupation is farmer.	U.S. Census, 1930, Ancestry.com
1930s	There are numerous articles about the Bothwell family in society pages regarding club activities, charitable events, marriages, etc. and only one regarding ranching in 1939.	Various newspapers, Ancestry.com
1930	Bothwell's fancy fruit box business begins. At the same time, he has his own soil bacteriological laboratory, providing pruning, spraying and other services to 40 ranches from San Francisco to the Mexican border.	Los Angeles Times November 26, 1978 <i>No other sources could be found verifying most of this information. Additionally, the house was not constructed until 1934. The existing south shed dates from 1952 but appears to have replaced an older building from the 1940s.</i>
1934	Marion Seale Bothwell lives on Ventura Boulevard. No address number was included.	California Voter Registrations, Ancestry.com
1934	The existing house is constructed.	Los Angeles County Office of the Assessor
1938	L.F. Bothwell lives at 5000 Oakdale Avenue. His occupation is rancher.	California Voter Registrations, Ancestry.com <i>Apparently, the street was renumbered around 1950.</i>
1939	Bothwell is mentioned i as an "agricultural advisor to film stars in the San Fernando Valley driving one of his four Rolls Royce trucks."	San Francisco Examiner February 16, 1939

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1940s	There are numerous articles about L.F. Bothwell regarding his automobile collection but none regarding ranching.	Various newspapers, Ancestry.com
1940	L.F. Bothwell lives at 5000 Oakdale Avenue with his wife Marion Seale, son L.F. Jr, and daughter, Bonnie. His occupation is farmer.	U.S. Census, 1920, Ancestry.com
1940	The house and south shed are present at this time. The south shed was used for farm equipment. There is a pergola type structure in the current location of the garage and tool shop. There appear to be small structures in the current location of the “worker housing.”	UCSB Geospatial Collection
1942	L.F. Bothwell lives in Canoga Park with his wife Marion Seale.	World War II Draft Card, Ancestry.com
1944	Marion Seale Bothwell lives at 5000 Oakdale Avenue.	California Voter Registrations, Ancestry.com
1944	The property remains the same as it was in 1940.	UCSB Geospatial Collection
1947	The storage building for Bothwell’s car collection is constructed.	Los Angeles County Office of the Assessor
1947	The house and storage building are present at this time. The south shed was either removed or covered with trees in the photograph.	Historic Aerials.com <i>The HCM nomination states the garage and tool shop are constructed by 1947, but this is a misreading of the photograph.</i>
1949	Marion Seale Bothwell lives in Oakland with her children Lindley Jr. and Bonnie.	1949 City Directory
1949	A fire destroys 32 antique vehicles; presumably the buildings they were stored in were destroyed as well.	Los Angeles Times, February 5, 1949
1950	Helen Ann Bothwell lives at 5300 Oakdale Avenue.	California Voter Registrations, Ancestry.com <i>There is no online record of a divorce and re-marriage.</i>
1952	The house and storage building remain. The pergola and garage are gone. The current south shed is	Historic Aerials.com

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	present. The first floor was used for farm equipment and the second floor for the car collection.	
1954	L.F. Bothwell lives at 5300 Oakdale Avenue.	California Voter Registrations, Ancestry.com
1960	The house, storage building, south shed remain. The garage and tool shed are present.	UCSB Geospatial Collection
1964	The house, storage building, south shed, garage and tool shed remain. The “worker housing” is present.	Historic Aerials.com <i>The building identified in the HCM nomination as “worker housing” is a multipurpose building with a workshop and storage as well as a caretaker’s unit on the second floor.</i>
1967	The property remains the same as it was in 1964.	Historic Aerials.com
1971	The property remains the same as it was in 1964.	UCSB Geospatial Collection
1978	The property remains mostly the same as it was in 1964. The train station and storage shed are present, and the immediate area is still planted with orange trees.	Historic Aerials.com
1980	The buildings and structures on the property remain the same as they were in 1964; however, <u>the trees on the 10-acre parcel are essentially gone.</u>	Historic Aerials.com
1985	The trees are replanted on the 10-acre parcel.	Historic Aerials.com
1987	Marion Seale Bothwell dies.	U.S. Death Index, Ancestry.com
1994	L.F. Bothwell lives at 5300 Oakdale Avenue.	U.S. Phone and Address Directories, Ancestry.com
1996	L.F. Bothwell dies.	U.S. Find a Grave Index, Ancestry.com
2016	Helen Ann Bothwell dies.	U.S. Find a Grave Index, Ancestry.com



Figure 4: 1928 aerial photograph, UCSB Geospatial Collection, approximate boundary of property outlined in red. Note orange trees are planted, but no buildings or structures are present.



Figure 5: 1940 aerial photograph, UCSB Geospatial Collection, approximate boundary of property outlined in red. Note orange trees are planted, road cuts through the middle of the property, the house is on the south side of the road, and there are various buildings and structures on the southeast side of the property.



Figure 6: 1944 aerial photograph, UCSB Geospatial Collection, approximate boundary of property outlined in red. Note the property remained unaltered from 1940.



Figure 7: 1947 aerial photograph, NETR Historic Aerials.com, approximate boundary of property outlined in red. Note the construction of storage building for the car collection on east.



Figure 8: 1952 aerial photograph, NETR Historic Aerials.com, approximate boundary of property outlined in red. Note the structure and buildings that once stood on the southeast are gone.



Figure 9: 1960 aerial photograph, UCSB Geospatial Collection, approximate boundary of property outlined in red. Note the garage and tool shed are present, but the orange trees are beginning to fade.



Figure 10: 1964 NETR Historic Aerials.com, approximate boundary of property outlined in red. Note the construction of the north storage buildings and the orange trees are continuing to fade.

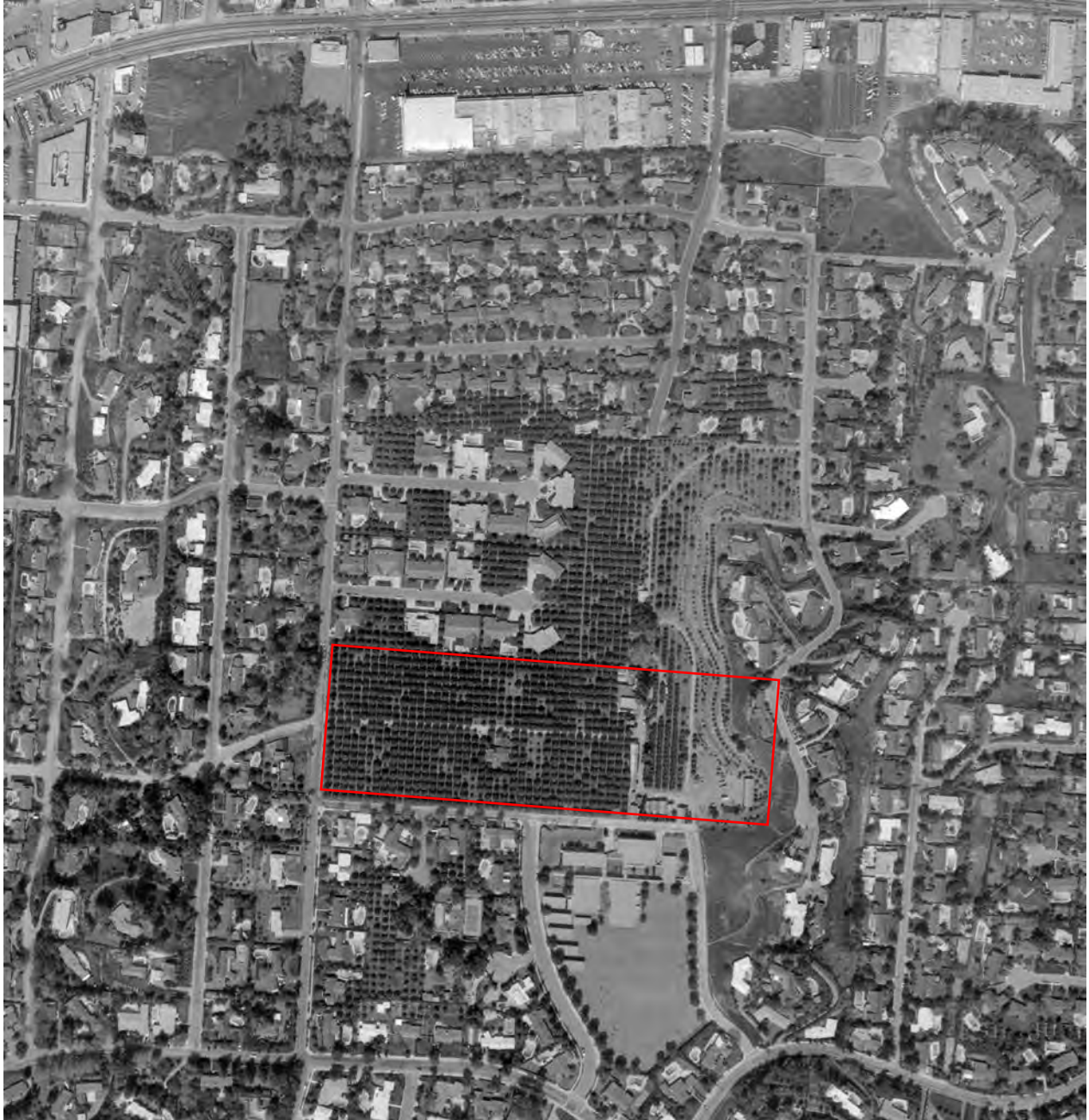


Figure 11: 1971 aerial photograph, UCSB Geospatial Collection, approximate boundary of property outlined in red. Note the property remained unaltered from 1964.



Figure 12: 1978 NETR Historic Aerials.com, approximate boundary of property outlined in red. Note the construction of the train station and shed and the orange trees are continuing to fade.



Figure 13: 1980 NETR Historic Aerials.com, approximate boundary of property outlined in red. Note the orange trees are essentially gone.



Figure 14: 1985 NETR Historic Aerials.com, approximate boundary of property outlined in red. Note the orange trees have been replanted.

Exhibit E

Teresa Grimes | Historic Preservation

Teresa.Grimes@icloud.com

323-868-2391

February 4, 2025

City Planning Commission
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Re: Response to Appeal, 5300 Oakdale Avenue; VTT-83927; ZA-2023-2170-
ZAD-ZV-ZAA; ENV-2020-6762-EIR (Program EIR)

Dear President Lawshe and Planning Commissioners:

I am a qualified Architectural Historian and Historian under the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) and have more than 35 years of experience in the identification, evaluation, and documentation of properties as historical resources as well as the analysis of impacts on significant resources pursuant to federal, state, and local laws and regulations. My resume is attached for your consideration. I am writing in response to the appeal of the proposed project (Project) at 5300 Oakdale Avenue. The Appellant argues that the Project will have impacts not addressed in the Housing Element EIR, including impacts on historical resources. The Appellant fails to acknowledge, however, that impacts on historical resources were fully analyzed in a professionally peer-reviewed assessment report that is part of the public record. The "5300 Oakdale Avenue, Los Angeles, California, Historical Resource Assessment Report" (Historic Report) dated January 2024 and prepared by my firm, provided an in-depth evaluation of the property and concluded it was not a historical resource as defined by CEQA. Therefore, the Project will have no impacts on historical resource because there are none on the Project site or immediate vicinity.

Properties identified by SurveyLA are not mandatory or presumptive historical resources

The Appellant notes that the property was identified by SurveyLA, the city-wide historic resource survey of Los Angeles, but misrepresents its meaning. SurveyLA was a reconnaissance-level survey that systematically identified properties potentially eligible under federal, state, and local landmark and historic district programs. The survey was conducted from the public right-of-way and site-specific research was limited. The City's "CEQA Guide for Historical Resources" adopted in September 2024 clearly states that properties identified by SurveyLA are not mandatory or presumptive historical resources. The City has the discretion to consider such properties as historical resources unless a preponderance of evidence demonstrates otherwise. The City makes the determination regarding the treatment of properties as historical resources for CEQA purposes based upon the whole record including studies prepared by qualified professionals. It is not unusual for properties identified as potential historical resources by SurveyLA to be

determined ineligible for designation based upon further investigation. Such was the case with the property at 5300 Oakdale Avenue.

Properties rejected as HCMs are not mandatory or presumptive historical resources

The Appellant references the Letter of Determination issued by the Zoning Administrator (ZA) and notes the City Council declined to list the property as a Historic-Cultural Monument (HCM) based upon evidence it did not meet the criteria. The Appellant cites the Staff Report prepared by the Office of Historic Resources (OHR) and Cultural Heritage Commission (CHC) to support its contention that the property qualifies as a historical resource under CEQA. However, a recommendation by the CHC to the City Council to designate a property as a HCM does not make it a historical resource as defined by CEQA. While a property *designated* as a HCM is presumed to be historical resource for CEQA purposes, one that has been *nominated and rejected* is not. According to the Cultural Heritage Ordinance, only the City Council has authority to designate properties as HCMs – not the CHC or OHR Staff.

The Appellant denigrates the City Council’s decision to decline the HCM nomination as “politically infused” rather than face the facts it does not meet the criteria based upon the whole record. In addition to the CHC Staff Report, which omitted important information, the City Council considered in its decision other information that demonstrated the property is not historically significant.

Criteria for HCM designation are not the same as those for National or California Registers

The Appellant has based their argument that the property is eligible for listing in the National and California Registers on the limited information in the HCM nomination even though the criteria are not the same. This is why locally designated historical resources (i.e., HCMs) are *presumptive* rather than *mandatory* historical resources. In many cases, a designated HCM will not be eligible for listing in the National or California Registers because it is less than 50 years of age or lacks physical integrity. The Cultural Heritage Ordinance does not include a minimum age requirement or a physical integrity requirement for a property to be a designated HCM.

The ZA did not assume the City Council’s decision to decline the HCM nomination meant the property was not a historical resource for CEQA purposes, as suggested by the Appellant. Rather, the ZA considered the evidence and conclusions in the Historic Report, which evaluated the property based on the applicable criteria for listing in the National and California Registers and concluded that it is not eligible. The Historic Report was prepared in accordance with the City’s requirements, reviewed by the City’s expert staff, and its findings were accepted as valid by the Department of City Planning.

Age and 50 Year Rule

The Appellant notes that the property operated as a commercial citrus grove between 1926 and 2016. As the Cultural Heritage Ordinance does not have a minimum age requirement, the HCM nomination concluded that the period of significance ended at 2016. To be eligible for listing in

the National and California Registers, however, a property must have achieved significance more than 50 years ago. Thus, to be eligible for listing in the National or California Registers when the environmental review as conducted in 2024, the property at 5300 Oakdale Avenue must have achieved significance by 1974, 50 years ago, or meet special requirements. Properties less than 50 years of age must be exceptionally important to be considered eligible for listing in the National Register. Properties less than 50 years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand their historical importance. As discussed below, the property was not significant as of 1974 and is not of exceptional importance.

Criterion A - Agriculture

The Appellant claims the property is eligible under National Register Criterion A because it “is associated with the once-dominate citrus industry in Los Angeles as the last operating commercial orange grove in the San Fernando Valley.” This is the same argument for HCM designation that was rejected by the City Council, and no new information has been provided.

There is no evidence the grove played a significant role in the history of agriculture before 1974. According to *National Register Bulletin #15*, “Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well.”¹

The grove was originally planted in 1926 and was merely part of a trend that was already well established. As discussed in the *Los Angeles Citywide Historic Context Statement* for Industrial Development:

Oranges were introduced to the region around 1804 at Mission San Gabriel, and Mission trees formed the basis of groves of several Los Angeles growers. The first orange grove in Los Angeles was laid out in 1834, when William Wolfskill planted 70 acres near present day Fourth and Alameda Streets. Wolfskill was later reported to own more than two-thirds of California’s orange groves.²

The grove on the subject property is not especially old in the context of the citrus industry in Los Angeles and as explained in the Historic Report, the grove was completely replaced between 1980 and 1985. Even if the original grove remained from 1926, a property is not automatically significant simply because of its age. To be eligible, the property must be significant in the history of agriculture beyond its age, which has not been demonstrated by the Appellant.

¹ Patrick Andrus and Rebecca Shrimpton, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: U.S. Department of the Interior, 1997), 12.

² LSA Associates, “Context: Industrial Development, 1850-1980,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, December 2015), 20.

Criterion A - Entertainment

The Appellant claims the property is significant in the context of the entertainment industry as the location of the “first live outdoor dramatic color television broadcast.” “All the Trees in the Field” was an episode of the NBC anthology series *Matinee Theater* filmed on the property at 5300 Oakdale Avenue on January 11, 1956. The Appellant does not cite any scholarly sources on the history of television explaining how this event was a milestone, nor were any found in the preparation of this response. In fact, credible evidence documents earlier live television broadcasts, including color broadcasts. Some sources note the first live outdoor television broadcast as the Epsom Derby on June 3, 1931, and others note a simple shot from a park in London on November 10, 1936; in both cases the broadcasts aired on BBC.³ Fifteen years later on June 25, 1951, CBS aired the first live color television broadcast, which was the variety show “Premiere.” The first live outdoor color broadcast was the Tournament of Roses Parade on NBC on January 1, 1954. Naturally, sporting events and news segments would continue to be broadcast live and in color outside.

Just like the last of its kind is not necessarily significant, neither is the first. In this case, the Appellant is creating a “first” by splitting hairs (claiming it was the first “dramatic” outdoor live color broadcast), which is why the context of filming on location is so important. *National Register Bulletin #15* states “the significance of a property can be judged and explained only when it is evaluated within its historic context.”⁴ The *Los Angeles Citywide Historic Context Statement for The Entertainment Industry* includes the theme Filming Locations Associated with the Motion Picture and Television Broadcasting Industries, 1908-1980. The theme provides an overview of location filming dating back to the 1890s. With regard to the history of television, the theme explains that the industry was moving away from live programming toward filmed programming in the mid-1950s:

As television found its way into more homes across the United States in the 1950s, the commercial television industry began to evolve from live programming toward filmed programming. This shift allowed scripted-content genres, such as dramas and comedies, to flourish in the mid-1950s.⁵

³ “A Brief History of Outside Broadcasting,” *Ross Video*, posted on May 21, 2024, https://www.rossvideo.com/blog/a-brief-history-of-outside-broadcasting/#:~:text=The%20First%20Outside%20Broadcast&text=In%20the%20early%20days%20of,crew%20on%20November%2010%2C%201936;‘The%20First%20Outside%20Television%20Broadcast,’%20Epsom%20&%20Ewell%20History%20Explorer,accessed%20on%20January%2031,%202025,https://eehe.org.uk/28911/outsidetv/#:~:text=Baird's%20'Caravan'%20by%20the%20winning,transmission%20facilities%20of%20the%20latter;‘Outside%20Broadcasting,’%20Wikipedia,accessed%20on%20January%2031,%202025,https://en.wikipedia.org/wiki/Outside_broadcasting

⁴ *National Register Bulletin #15*. 7.

⁵ Historic Resources Group, “Context: The Entertainment Industry, 1908-1980,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, September 2019), 24

Westerns were just as popular as television shows as motion pictures, which was enhanced by the authenticity created by filming on location:

The late 1950s saw an exponential rise in the number of action-oriented Westerns on television, including *Cheyenne*, *Gunsmoke*, *Maverick*, *Have Gun – Will Travel*, and *The Rifleman*. Although filming was still primarily limited to the studio, the Western’s natural inclusion of outdoor action sequences began to signal the forthcoming trend of filming on location for television, and sequences for many of television’s early Westerns were filmed amidst the surrounding landscape of Southern California at movie ranches owned by studios or independent producers.⁶

“The Lone Ranger” on ABC from 1949 to 1957 and “Hopalong Cassidy” on NBC from 1949 to 1952 are also examples of early Western television series that incorporated scenes filmed on outdoor sets. The syndicated “The Cisco Kid” had been filmed in color since 1949 in anticipation of color broadcasting.

The producers of *Matinee Theater* did not incite NBC to create programming in color as implied by the Appellant. NBC was already at the forefront of color programming because its parent company RCA manufactured the most successful line of color television sets.⁷ During the 1955-56 television season, three regularly scheduled programs were broadcast in color. The 1956-57 season would feature 17 series filmed in color.

As noted above, the first live outdoor color television broadcast was the Tournament of Roses Parade on NBC on January 1, 1954. The episode “All the Trees in the Field” aired two years later on January 11, 1956. The only factor that stands out in the Appellant’s claim of significance is “drama.” The fact that the program was a drama instead of a variety show or a Western does not appear to be of any consequence in the history of television. Furthermore, this is when television was shifting away from live programming toward filmed programming, so in this regard “All the Trees in the Field” was at the end rather than the beginning of the trend.

Even if the episode “All the Trees in the Field” was an important milestone in the history of television, the period of significance would be 1956. The Appellant does not identify the physical features of the property that would illustrate this moment in time. Additionally, to be eligible for listing in the National Register, the property would need to retain sufficient integrity from 1956 to convey the significance, which is not the case.

Criterion B – Lindley Bothwell

The potential significance of the property in relation to Lindley Bothwell (1901-1986) was fully analyzed in the Historic Report and found ineligible for listing under Criterion B. To be eligible for listing under Criterion B, a property must be associated with the lives of persons significant in our

⁶ Ibid.

⁷ Gorham A. Kindem, “Hollywood’s Conversion to Color: The Technological, Economic, and Aesthetic Factors,” *Journal of the University Film Association*, Vol. 31, No. 2, (Spring 1979), 35.

past. Several steps are involved in determining whether a property is significant under Criterion B. First, the person must be significant within a historic context. Second, the property must be associated with the person's productive life. Finally, the property must be compared with other associated properties to identify the best representation of the person's historic contributions.

From 1929 to 1986, the property at 5400 Oakdale Road was owned and occupied by Bothwell and his family. No evidence was found indicating that he was significant within a historic context. Bothwell's activities included cheerleading (or yelling), farming, fundraising, and car collecting and racing. *National Register Bulletin #15* states the person's activities must be "demonstrably important" within national, state, or local history.⁸ Having interesting hobbies, working in an identifiable profession, or being fondly remember by a community is not justification for significance under Criterion B. Of all of his activities, car collecting was the most notable. Even if there was a context developed for this topic and Bothwell was considered a significant figure, the importance would be attached to the collection, not the buildings in which the collection was stored. Criterion B is typically restricted to properties that illustrate through it physical features the person's important achievements.⁹ Thusly, the Historic Report correctly concluded the property is ineligible for listing under Criterion B. The storage sheds on the property are utilitarian in design and do not express the collection they once, but no longer contain. The Appellant does not offer any new credible information regarding Bothwell, merely a different opinion, which is inconsistent with the National Park Service guidance.

Period of Significance

Since the property was found ineligible for listing in the National and California Registers in the Historic Report, it has no period of significance. For historically significant properties, however, the period of significance is usually measured by the length of the association(s). If a property is eligible under more than one criterion for significance and/or more than one context, each must be identified. Thus, the period of significance under Criterion A would be different from Criterion B, and the period of significance in the context of citrus industry would be different from the period of significance in the context of the entertainment industry. Nevertheless, the Appellant argues that the period of significance simply ends in 2016 when the owners stopped operating it as a commercial citrus grove. The Applicant is not only incorrectly applying the concept, but they are also incorrectly conflating continued use with historic significance.

A property is not automatically significant because of the length of its use as suggested by the Appellant. National Park Service guidance for determining a period of significance states that:

Continued use or activity does not necessarily justify continuing the period of significance. The period of significance is based upon the time when the property made the contributions or achieved the character on which significance is based.

⁸ *National Register Bulletin #15*. 14.

⁹ *Ibid.*

Fifty years ago is used as the closing date for periods of significance where activities begun historically continued to have importance and no more specific date can be defined to end the historic period. (Events and activities occurring within the last 50 years must be exceptionally important to be recognized as "historic" and to justify extending a period of significance beyond the limit of 50 years ago.)¹⁰

The argument the property is significant under National Register Criterion A in the citrus industry context is fatally flawed because it is based upon the twisted notion that the importance is the continued use. According to family history, after the death of Bothwell in 1986, his wife Annie kept the trees alive in his honor. Once they were no longer profitable, she sold other assets to keep watering them. When she died in 2016, the heirs decided to sell the property. This is the story of a woman keeping the memory of her late husband alive, not the story of a citrus grove significant in the agricultural history of Los Angeles.

Conclusion

The property at 5300 Oakdale Avenue is not currently designated under national, state, or local landmark or historic district programs. The property was identified in the 2012 historic resource survey of the Encino – Tarzana CPA as appearing eligible for listing in federal, state, and local registers of historical resources. After careful inspection, investigation, and evaluation, the Historic Report concluded that none of the buildings, structures, or sites on the property appear to be individually or collectively eligible for listing in the National and California Registers due to a lack of significance. The Los Angeles City Council determined the property does not qualify for designation as a HCM. Thus, the property is not a historical resource as defined by CEQA and as a result the Project would not cause any site-specific impacts on historical resources.

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in cursive script that reads "Teresa Grimes". The signature is written in black ink on a white background.

Teresa Grimes

¹⁰ Linda McClelland, Linda, Carol D. Shull, James Charleton, et, *National Register Bulletin #16A: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: U.S. Department of the Interior, 1997), 42.

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Teresa Grimes has 30 years of experience in the field of historic preservation. She is widely recognized as an expert in the identification and evaluation of historical resources having successfully prepared dozens of landmark and historic district nominations for a wide variety of property types. Teresa graduated from the University of California with a Master of Art degree in Architecture and has worked in the private, public, and non-profit sectors. She has extensive experience in the preparation of environmental compliance documents in accordance with the California Environmental Quality Act (CEQA) including the identification of historical resources, analysis of direct, indirect, and cumulative impacts, and development of mitigation measures. Teresa has also managed the preparation of historic structure reports and worked with architects, engineers, and conservators to comply with the Secretary of the Interior’s Standards for the Treatment of Historic Properties. Some of her CEQA projects are listed below.

Educational Background

- M.A., Architecture, University of California, Los Angeles, 1992
- B.A., Political Science, University of California, Los Angeles, 1986

Qualifications

- Meets the Secretary of the Interior’s Professional Qualifications Standards for history and architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.

Professional Activities

- Friends of Residential Treasures: Los Angeles, Board Member, 2024-Present
- Pasadena Heritage, Board Member, 2008-2012
- Highland Park Heritage Trust, Board Member, 1996-1998
- West Hollywood Cultural Heritage Advisory Board, Board Member, 1990-1994

Professional Experience

- Teresa Grimes | Historic Preservation, Principal, 1999-2005, 1993-1994, 1991-1992, 2020 - Present
- GPA Consulting, Principal Architectural Historian, 2009-2020
- Christopher A. Joseph & Associates, Senior Architectural Historian, 2006-2009
- Historic Resources Group, Architectural Historian, 1994-1998
- Getty Conservation Institute, Research Associate, 1992-1993
- Los Angeles Conservancy, Preservation Officer, 1988-1991

Selected Projects

- Art Center College of Design Master Plan, Pasadena, Historical Resource Technical Report, 2016
- Baldwin Hills Crenshaw Plaza, Los Angeles, Historical Resource Technical Report, 2010
- Campbell Hall Master Plan, Los Angeles, Historical Resource Technical Report, 2007
- City of Hope Specific Plan, Alhambra, Historical Resource Survey and Technical Report, 2016
- Claremont Graduate University Master Plan, Claremont, Historical Resource Survey and Technical Report, 2015
- Claremont McKenna College Master Plan, Claremont, Historical Resource Survey and Technical Report, 2008-2010
- CF Braun & Company Plan, Alhambra, Historical Resource Technical Report, 2020
- Downtown Specific Plan Update, El Segundo, Historical Resource Technical Report, 2021-Ongoing
- Emerson College Hollywood Campus, Los Angeles, Historical Resource Technical Report, 2010
- Los Angeles Aerial Rapid Transit Project, Los Angeles, 2020-2022
- Los Angeles County Museum of Art Master Plan, Los Angeles, Historical Resource Technical Report, 2020
- Oakwood School Master Plan, Los Angeles, Historical Resource Technical Report, 2016
- Scripps College, Claremont, Secretary of the Interior’s Standards Compliance, 2020-2021
- Silver Lake Reservoir Master Plan, Los Angeles, Secretary of the Interior’s Standards Compliance, 2020-2021
- TVC 2050 Specific Plan, Los Angeles, Peer Review, 2021-2024
- West LA Commons, Los Angeles, Peer Review, 2021-2022
- Westlake /MacArthur Park Project, Los Angeles, Historical Resource Technical Report, 2020-2024

Exhibit F



PROTECTED TREE REPORT

PREPARED FOR

Oakdale Estates, LLC
11766 Wilshire Blvd. Suite 820
Los Angeles, CA 90025

PROPERTY

5300 Oakdale Ave
Woodland Hills, CA 91364
APNs 2164-008-001, -005, -006, and -007
Council District 3, Encino -Tarzana Community Plan

CONTACT

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February 7, 2024

PREPARED BY

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ASSIGNMENT

The Assignment included:

- Field Observation and Inventory of Trees on Site
- Recommendations for the protection of trees to remain
- Photographs of the subject trees are included in Appendix B
- Matrix of proposed protected tree removals and protected trees to remain
- Evaluation of potential construction impacts
- A Tree Location Plot Map is included in Appendix A
- Protected tree construction impact guidelines

LIMITS OF THE ASSIGNMENT

The field inspection was a visual, grade level tree assessment. No special tools or equipment were used. No tree risk assessments were performed. My site examination and the information in this report is limited to the date and time the inspection occurred. The information in this report is limited to the condition of the trees at the time of my inspection.

TREE CHARACTERISTICS AND SITE CONDITIONS

Detailed information with respect to size, condition, species and recommendations are included in the Summary of Field Inspections in Appendix C. The trees are numbered on the Tree Location Map in Appendix A.

PROTECTED TREE REPORT

5300 Oakdale Ave, Woodland Hills, CA 91364

SUMMARY AND OVERVIEW

PROJECT OVERVIEW	
Site Address	5300 Oakdale Ave, Woodland Hills, CA 91364
Location and/or Specific Plan	Woodland Hills
Project Description	21 New Single Family Residences
Date of Site Inspection	04/29/23 and 01/28/24
Number of Protected Trees on Site	3
Number of Recommended Removals	0
	Overall Area: 612,868.50 sq.ft. (14.07 AC); Proposed Area: 426,848.03 sq.ft. (9.91 AC); MRCA Preservation Area: 186,020.47 sq.ft. (4.16 AC)

The property located at 5300 N. Oakdale Avenue, Los Angeles, CA 91364, Oakdale Estates, is an intact 14-acre citrus orchard straddling the neighborhoods of Tarzana and Woodland Hills. Oakdale Estates, LLC is proposing to preserve approximately 4.16 acres of the orchard including existing drives and adding a new caretaker unit on the preserved property in conjunction with developing 21 single family lots on the remaining 9 acres of property, consistent with the zoning. Furthermore, as a feature to the proposed project; two rows of citrus trees on approximately 0.39 acres and most of the Washingtonian Fan Palm trees located along Oakdale Avenue will be retained. A suitable public agency will be selected to take title to the preserved area. There are a total of 1,451 citrus trees on site. A total of 1,143 trees in the north and south groves are proposed removals and 308 trees will be preserved and replanted. A further discussion of the Citrus trees is in Exhibit D.

PROTECTED TREES, URBAN FORESTRY DIVISION

This property is under the jurisdiction of the City of Los Angeles and guided by the Native Tree Protection Ordinance No. 186873. **Protected Trees** are defined by this ordinance as oaks (*Quercus* sp) indigenous to California but excluding the scrub oak (*Quercus dumosa*); Southern California black walnut (*Juglans californica* var. *californica*); Western sycamore (*Platanus racemosa*) and California bay laurel (*Umbellularia californica*) trees with a diameter at breast height (DBH) of four inches (4") or greater. **Protected Shrubs** are defined as Mexican elderberry (*Sambucus mexicana*); Toyon (*Heteromeles arbutifolia*) which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub.

At this time I observed three (3) coast live oak (*Quercus agrifolia*) trees on the property. (See Appendix A.1 for Tree Location Map) These trees will be retained and protected in place. One (1) coast live oak is located on the proposed area for construction, and will be retained and protected in place. Two (2) coast live oaks are located on the preserved area and will also be retained and protected in place. Please refer to the Appendix A.1 Tree Location Map on page 20.

NEIGHBOR TREES - OFFSITE TREES

There are six (6) coast live oak trees on the neighboring adjacent properties that will not be impacted by construction.

These trees will be retained and protected in place and are offsite on the preserved land where no construction will occur.

CITY OF LOS ANGELES STREET PARKWAY TREES, URBAN FORESTRY DIVISION

At this time, I observed nineteen (19) **City of Los Angeles Street Trees** in the parkway perimeter of the property. These street trees were approximately 60 foot tall Fan Palms.

Fifteen (15) trees will receive no impact and will be retained, four (4) trees are recommend for removal due to driveway installation and required road widening. City Department of Engineering was contacted, and they have agreed to reduce the required pavement section along Oakdale Avenue enough to preserve the remaining palm trees.

NON-PROTECTED SIGNIFICANT TREES, DEPARTMENT OF CITY PLANNING

The Department of City Planning requires the identification of the location, size, type and condition of all existing trees on the site with a DBH (Diameter at breast height = 54" above grade or 4.5") of 8 inches (8") or greater. These trees will be identified as **Non-Protected Significant Trees**.

At this time, I observed (9) Non-Protected Significant Trees on the property.

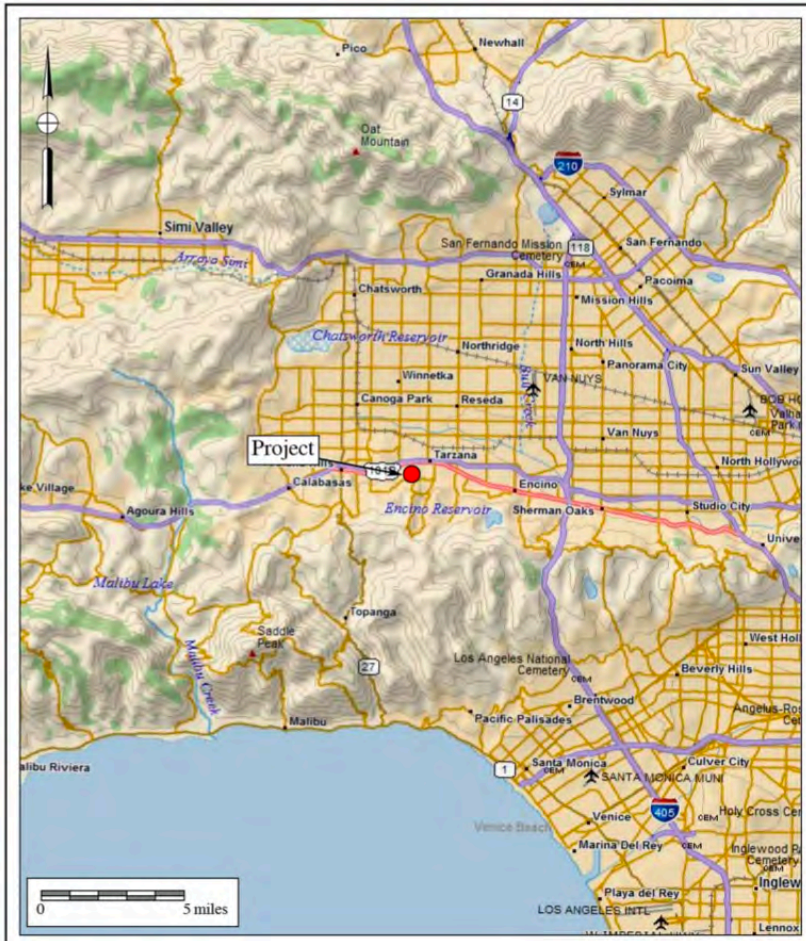
Three (3) trees are located in the area of construction. Canary pine trees #5, #10 and #11 will be impacted by construction and are recommended for removal and replacement to the satisfaction of the City of Los Angeles Department of City Planning.

Six (6) other non-protected significant trees will be retained and protected in place in the preserved area.

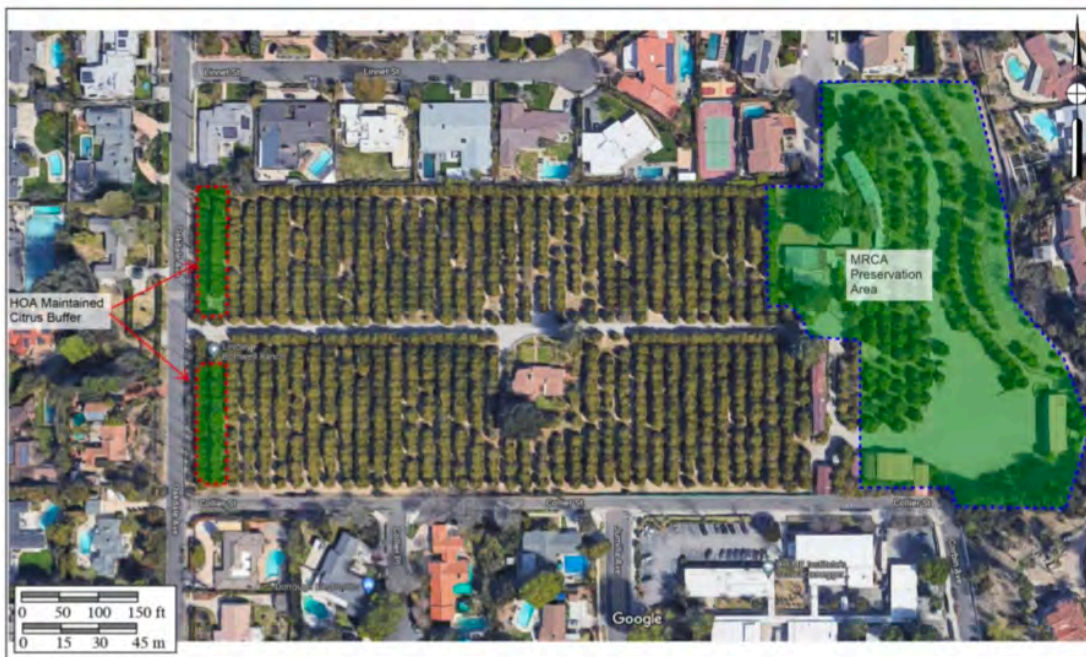
NEW TREES

In addition to the 308 trees being preserved and replanted, (57 of the 308 are being replanted in the area along Oakdale Avenue) the project will plant/install 328 new native trees and shrubs on the property, such as coast live oak (*Quercus agrifolia*), Western Sycamore (*Platanus racemosa*) and toyon shrub (*Heteromeles arbutifolia*). Along Collier Street, 66 of the new trees will be installed. 212 new native trees/shrubs will be installed within the areas of construction, and 50 new native trees/shrubs will be planted in the preserved area in locations determined by the preservation agency.

PROPERTY LOCATION



AERIAL PHOTO OF PROPERTY



IMPACT ANALYSIS AND SPECIFIC RECOMMENDATIONS

PROTECTED TREES #1

Oak tree #1 is the solo protected tree within the future buildable pads on lot 16. This tree is setback 10'-6" from the edge of the proposed residence and a retaining wall will be constructed around this tree to mitigate grading differences. Exploratory trenching was performed around this tree and revealed no significant roots. This tree will tolerate the proposed retaining wall construction and will receive minimal impact and will be retained. See illustration below for retaining wall around oak #1.

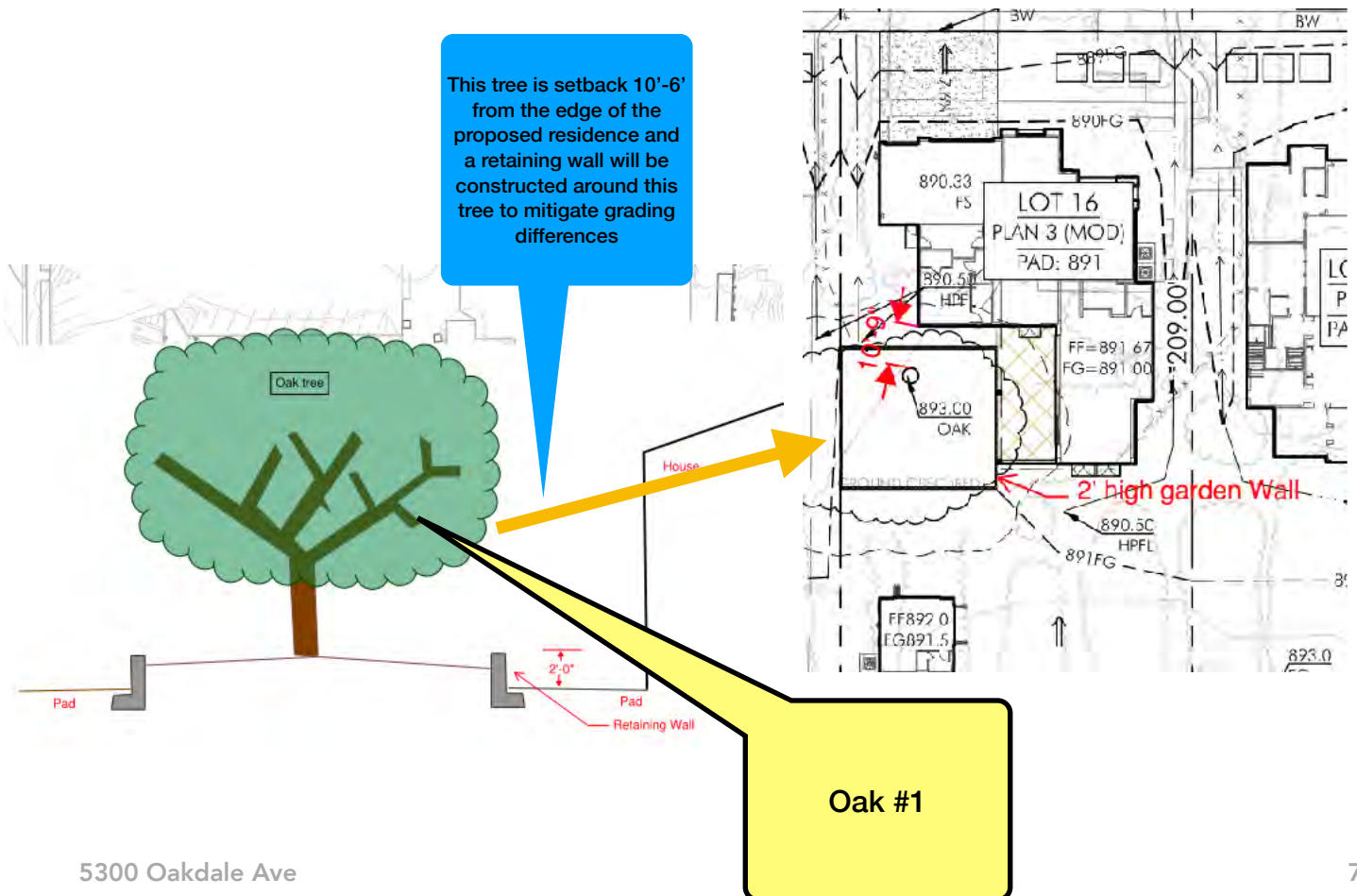
See Appendix A.1 Tree Location Map on page 6 for tree locations.

PROTECTED TREES #2 & #3

There are 2 oaks within the open area of this dedicated preserved land area and oaks flanking the perimeter. Protected oak trees #2 and #3 are outside of the construction zone, will receive no impact and will be retained and protected in place. See Appendix A.1 Tree Location Map on page 6 for tree locations.

OFF SITE PROTECTED TREES

Off-Site Oak tree #OS4 - #OS8 are outside of the construction zone and will be retained and protected in place. Four of these trees are offsite on the dedicated parcel/land where no construction will occur. Oak #OS9 on neighboring property is setback from the proposed construction. Any work performed nearby will assess the roots and modify any soil work prior to ensure reduced impact.



IMPACT ANALYSIS AND SPECIFIC RECOMMENDATIONS

STREET TREES

There are (19) nineteen Street *Washingtonia robusta* fan palms located in the ROW and are considered Parkway Street Trees.

City conditions require road widening of Oakdale Avenue and Collier Street to LADOT standards and construction of ingress/egress for this new housing development.

Two (2) Mexican Fan palms will need to be removed for the proper driveway opening at the westerly project entry along Oakdale Avenue. Additionally, another two (2) Mexican Fan Palms at the intersection of Collier Street and Oakdale Avenue will need to be removed to make way for the required road widening. This will be a total of four (4) Fan Palms to be removed for the road widening and installation of the entrance road/driveway.

The remaining 15 street palms will receive root pruning and will be minimally impacted by the road widening. Palms can handle root pruning in close proximity. These palms will be retained and protected in place. City Department of Engineering was contacted, and they have agreed to reduce the required pavement section along Oakdale Avenue enough to preserve the remaining palm trees.

Aerial View of Property- Shows locations of street trees



IMPACT ANALYSIS AND SPECIFIC RECOMMENDATIONS

AGRICULTURAL CITRUS GROVE

SUMMARY: This property contains an orchard of 1,451 citrus trees. Approximately 1,143 trees in the north and south groves are recommended for removal due to construction impact and their beyond-redemption condition. 251 trees on the preserved area behind train station, including the terrace area. Also, 57 trees will be retained and replanted along Oakdale Avenue. Replanting of some of the trees is necessary to complete the city ROW to city standards.

These remaining trees are in variable condition and will require regular active maintenance including adequate irrigation, fertilizers, pruning, weed and pest control to survive and be productive.

HISTORY OF SITE & CURRENT CONDITION REPORT BY CITRUS EXPERT DAVID MATIAS: Previously, the land was an agricultural orchard for growing, harvesting and selling citrus. Years of drought, poor irrigation and lack of maintenance took their toll and now the majority of this orchard is in major decline. These aged trees are both distressed and declining according to Dave Matias' report evaluating the citrus trees, dated March 14, 2022. See report in Appendix E, pages 45 - 52.

Mr. Matias goes on to note that these trees suffered many years of under-watering. The resulting damage is unlikely to be ameliorated in California's current water restrictive climate and, even if provided ample water, the orchard could not overcome years of neglect to return to its former state.

Substantial leaf loss, wilt and (branch) die-back indicates that these trees have been under watered for years. Once citrus is allowed to dry out, restoring water normally will not restore the tree to its original healthy state.

The trees are declining and in senescence (death spiral) and although they may have leaves and some fruit, it does not denote any meaningful potential for overcoming their age and natural lifespan of citrus trees in the most optimal conditions.

Dave Matias analysis was performed prior to 2022 summer's extended mega-drought, and will most certainly push most of these citrus trees into a "severe stress" condition.

AGRICULTURAL TREES not NON-PROTECTED SIGNIFICANT TREES: The agricultural citrus trees in this case do not meet the criteria for a typical, non-protected significant tree. A non-protected significant tree is an amenity tree that provides shade and canopy in an urban setting. Here, they are neither amenity nor shade canopy trees, but rather agricultural trees.

From a tree canopy standpoint, the existing trees have no desirable or significant quality, especially as compared to broad evergreen or broad deciduous trees. A shade tree can be defined as a tree that exceeds 25 feet in height at maturity, requires little maintenance and is drought tolerant. For all the foregoing reasons, these citrus trees meet neither the criteria for a typical amenity tree nor a shade tree. Thus, the 1:1 replacement requirement for non-protected, significant trees does not apply in this case.

In place of the dying orchard, twenty-one homes will be built and new trees will be planted. In fact, included in this project is a landscape plan which will incorporate a robust collection of new trees. Please see provided landscaping plan on page 9 of this report.

IMPACT ANALYSIS AND SPECIFIC RECOMMENDATIONS

NON-PROTECTED TREES 8" or greater

There is a low quantity of non-protected trees. These consist of seven canary pines and two queen palm trees. Canary pine trees #5, #10 and #11 will be impacted by construction and are recommended for removal. Six other trees will be retained and protected in place.

RETAINED CITRUS and OAKS - Aerial View of Property- Shows locations of retained citrus and oak trees and retained non-protected significant trees in NON developed areas.



GENERAL RECOMMENDATIONS

During the course of construction, trees can receive much stress, pollution, soil compaction and lack of water. The following general recommendations should be followed to establish and maintain a healthy environment for all retained trees.

WORKING IN THE TREE PROTECTION ZONE

This area generally encompasses an area within the dripline of the tree plus additional feet depending on the species and size of the tree. However, if you should need to encroach within a tree's protected zone, please follow these guidelines.

Observation – All work within the protected zone should be observed by a certified arborist experienced with each specific tree's requirements. The arborist should be contacted in a timely manner to ensure their availability.

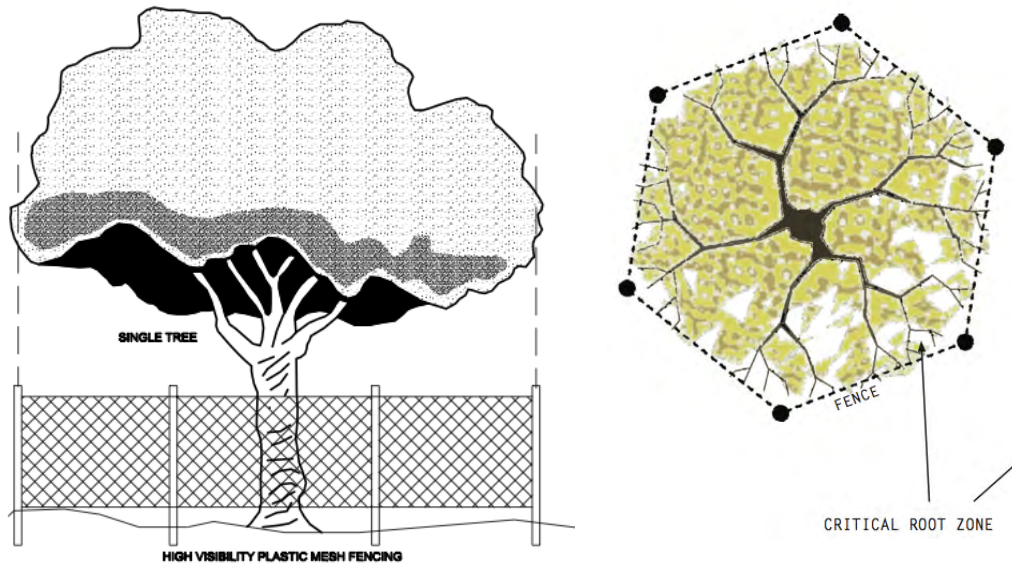
Hand Tools – All work should be performed utilizing hand tools only. To reduce compaction in the root zone, no large equipment, such as backhoes or tractors should be utilized in this protected zone.

Root Pruning - Should there be a need to perform any light root pruning, it should be done carefully. The roots should be exposed through hand digging. **The roots should be cut at a 90-degree angle and cut cleanly.** No roots should be torn or jagged; this can lead to rotting and decay in the root zone and reduced stability and health in the tree. I caution excessive root pruning, and encourage you to err on the conservative side. If a tree is in any existing stress or is lacking in health and vigor, the root pruning can contribute to the quick decline of a tree.

Protective Fencing – If necessary, the arborist should be contacted to develop a specific fencing plan for your trees. Fencing may be of a flexible configuration and be a minimum of 4 feet in height. A warning sign must be displayed on the street side of the fence, stating the requirements of all workers in the protected zone. Throughout the course of construction, maintain the integrity of the tree protection zone fencing and keep the site clean and maintained at all times.

Irrigation – Irrigate trees for the duration of the project. If the tree is newly planted, deep watering should be weekly during its establishment period. If the tree is quite mature, deep water once per month during spring and summer months.

PROTECTIVE FENCING



Tree protection fencing must be installed at the edge of the Tree Protection Zone (critical root zone) or beyond **prior to the start of any clearing, grading or other construction activity**. If space limits the fencing, place at the furthest possible distance from the trunk.

- 1) Fencing may be of a **flexible configuration or chain-link** and be a minimum of 4 feet in height supported by vertical posts at a maximum of ten-foot intervals to keep the fence upright and in place.
- 2) A warning sign should be posted on the fencing which states, **“Warning: Tree Protection Zone”** and stating the requirements of all workers in the protected zone. Example available upon request.
- 3) Throughout the course of construction, **maintain the integrity of the tree protection zone fencing and keep the site clean and maintained at all times**. No construction staging or disposal of construction materials or byproducts including but not limited to paint, plaster, or chemical solutions is allowed in the Tree Protection Zone.

PLANTING WITHIN THE PROTECTED ZONE

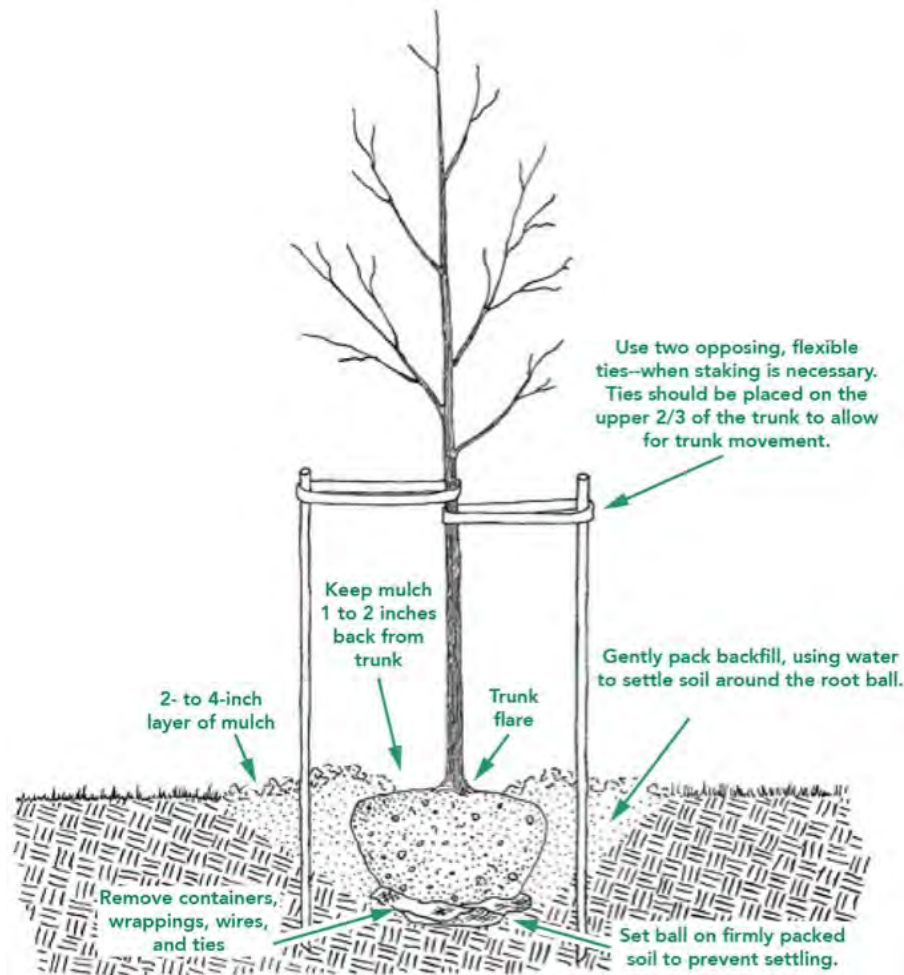
Trees remain healthier and vigorous with NO plantings within the protected zone. The natural leaf litter that the tree provides should be allowed to remain on the ground, to provide natural mulch and nutrients. If planting is desired, please follow these recommendations:

Plant Selection – Only drought tolerant plants that are compatible with the specific trees should be selected. Most importantly, select plants that are resistant to *Armillaria* or *Phytophthora*. Some trees are particularly susceptible to these diseases in urban areas and when under construction stress. Please refer to local guides for acceptable plant recommendations

Irrigation – Water should not be spraying toward the base of the trunk or tree; this can encourage rotting of the root crown. Excessive moisture on the base of the trunk can encourage *Armillaria mellea* (Oak Root Fungus) or *Phytophthora cinnamomi* (Avocado Root rot). Both of these fungus' can reduce the health and vigor of the tree, thus leading to decline and potential failure of the tree (falling over). It is recommended to only provide irrigation to the roots in the warmer months of spring and early summer, thus extending the natural rainy season. This irrigation should be provided via soaker hoses that do not spray upward.

Mulch - Apply a light layer of organic mulch over the root zone (approx. 3- 4 inches thick). The mulch will reduce loss of moisture from the soil, protect against construction compaction, and moderate soil temperatures. It also has been demonstrated that the addition of mulch reduces soil compaction over time. Do not place mulch against the trunk, instead placing at least 3 inches from base.

NEW TREE PLANTING



The ideal time to plant trees and shrubs is during the dormant season, in the fall after leaf drop or early spring before budbreak. Weather conditions are cool and allow plants to establish roots in the new location before spring rains and summer heat stimulate new top growth. Before you begin planting your tree, be sure you have had all underground utilities located prior to digging.

If the tree you are planting is balled or bare root, it is important to understand that its root system has been reduced by 90 to 95 percent of its original size during transplanting. As a result of the trauma caused by the digging process, trees commonly exhibit what is known as transplant shock. Containerized trees may also experience transplant shock, particularly if they have circling roots that must be cut. Transplant shock is indicated by slow growth and reduced vigor following transplanting. Proper site preparation before and during planting coupled with good follow-up care reduces the amount of time the plant experiences transplant shock and allows the tree to quickly establish in its new location. Carefully follow nine simple steps, and you can significantly reduce the stress placed on the plant at the time of planting.

NEW TREE PLANTING, continued

- 1. Dig a shallow, broad planting hole.** Make the hole wide, as much as three times the diameter of the root ball but only as deep as the root ball. It is important to make the hole wide because the roots on the newly establishing tree must push through surrounding soil in order to establish. On most planting sites in new developments, the existing soils have been compacted and are unsuitable for healthy root growth. Breaking up the soil in a large area around the tree provides the newly emerging roots room to expand into loose soil to hasten establishment.
- 2. Identify the trunk flare.** The trunk flare is where the roots spread at the base of the tree. This point should be partially visible after the tree has been planted (see diagram). If the trunk flare is not partially visible, you may have to remove some soil from the top of the root ball. Find it so you can determine how deep the hole needs for proper planting.
- 3. Remove tree container for containerized trees.** Carefully cutting down the sides of the container may make this easier. Inspect the root ball for circling roots and cut or remove them. Expose the trunk flare, if necessary.
- 4. Place the tree at the proper height.** Before placing the tree in the hole, check to see that the hole has been dug to the proper depth and no more. The majority of the roots on the newly planted tree will develop in the top 12 inches of soil. If the tree is planted too deeply, new roots will have difficulty developing because of a lack of oxygen. It is better to plant the tree a little high, 1-2 inches above the base of the trunk flare, than to plant it at or below the original growing level. This planting level will allow for some settling.
- 5. Straighten the tree in the hole.** Before you begin backfilling, have someone view the tree from several directions to confirm that the tree is straight. Once you begin backfilling, it is difficult to reposition the tree.
- 6. Fill the hole gently but firmly.** Fill the hole about one-third full and gently but firmly pack the soil around the base of the root ball. Be careful not to damage the trunk or roots in the process. Fill the remainder of the hole, taking care to firmly pack soil to eliminate air pockets that may cause roots to dry out. To avoid this problem, add the soil a few inches at a time and settle with water. Continue this process until the hole is filled and the tree is firmly planted. It is not recommended to apply fertilizer at time of planting.
- 7. Stake the tree, if necessary.** If the tree is grown properly at the nursery, staking for support will not be necessary in most home landscape situations. Studies have shown that trees establish more quickly and develop stronger trunk and root systems if they are not staked at the time of planting. However, protective staking may be required on sites where lawn mower damage, vandalism, or windy conditions are concerns. If staking is necessary for support, there are three methods to choose among: staking, guying, and ball stabilizing. One of the most common methods is staking. With this method, two stakes used in conjunction with a wide, flexible tie material on the lower half of the tree will hold the tree upright, provide flexibility, and minimize injury to the trunk (see diagram). Remove support staking and ties after the first year of growth.
- 8. Mulch the base of the tree.** Mulch is simply organic matter applied to the area at the base of the tree. It acts as a blanket to hold moisture, it moderates soil temperature extremes, and it reduces competition from grass and weeds. A 2- to 3-inch layer is ideal. More than 3 inches may cause a problem with oxygen and moisture levels. When placing mulch, be sure that the actual trunk of the tree is not covered. Doing so may cause decay of the living bark at the base of the tree. A mulch-free area, 1 to 2 inches wide at the base of the tree, is sufficient to avoid moist bark conditions and prevent decay.

TREE MAINTENANCE AND PRUNING

Some trees do not generally require pruning. The occasional removal of dead twigs or wood is typical. Occasionally a tree has a defect or structural condition that would benefit from pruning. Any pruning activity should be performed under the guidance of a certified arborist or tree expert.

Because each cut has the potential to change the growth of the tree, no branch should be removed without a reason. Common reasons for pruning are to remove dead branches, to remove crowded or rubbing limbs, and to eliminate hazards. Trees may also be pruned to increase light and air penetration to the inside of the tree's crown or to the landscape below. In most cases, mature trees are pruned as a corrective or preventive measure.

Routine thinning does not necessarily improve the health of a tree. Trees produce a dense crown of leaves to manufacture the sugar used as energy for growth and development. Removal of foliage through pruning can reduce growth and stored energy reserves. Heavy pruning can be a significant health stress for the tree.

Yet if people and trees are to coexist in an urban or suburban environment, then we sometimes have to modify the trees. City environments do not mimic natural forest conditions. Safety is a major concern. Also, we want trees to complement other landscape plantings and lawns. Proper pruning, with an understanding of tree biology, can maintain good tree health and structure while enhancing the aesthetic and economic values of our landscapes.

Pruning Techniques – From the I.S.A. Guideline

Specific types of pruning may be necessary to maintain a mature tree in a healthy, safe, and attractive condition.

Cleaning is the removal of dead, dying, diseased, crowded, weakly attached, and low- vigor branches from the crown of a tree.

Thinning is the selective removal of branches to increase light penetration and air movement through the crown. Thinning opens the foliage of a tree, reduces weight on heavy limbs, and helps retain the tree's natural shape.

Raising removes the lower branches from a tree to provide clearance for buildings, vehicles, pedestrians, and vistas.

Reduction reduces the size of a tree, often for clearance for utility lines. Reducing the height or spread of a tree is best accomplished by pruning back the leaders and branch terminals to lateral branches that are large enough to assume the terminal roles (at least one-third the diameter of the cut stem). Compared to topping, reduction helps maintain the form and structural integrity of the tree.

TREE MAINTENANCE AND PRUNING, continued

How Much Should Be Pruned?

Mature trees should require little routine pruning. A widely accepted rule of thumb is never to remove more than one-quarter of a tree's leaf-bearing crown. In a mature tree, pruning even that much could have negative effects. Removing even a single, large-diameter limb can create a wound that the tree may not be able to close. The older and larger a tree becomes, the less energy it has in reserve to close wounds and defend against decay or insect attack. Pruning of mature trees is usually limited to removal of dead or potentially hazardous limbs.

Wound Dressings

Wound dressings were once thought to accelerate wound closure, protect against insects and diseases, and reduce decay. However, research has shown that dressings do not reduce decay or speed closure and rarely prevent insect or disease infestations. Most experts recommend that wound dressings not be used.

DISEASES AND INSECTS

Continual observation and monitoring of your tree can alert you to any abnormal changes. Some indicators are: excessive leaf drop, leaf discoloration, sap oozing from the trunk and bark with unusual cracks. Should you observe any changes, you should contact a Tree specialist or Certified Arborist to review the tree and provide specific recommendations. Trees are susceptible to hundreds of pests, many of which are typical and may not cause enough harm to warrant the use of chemicals. However, diseases and insects may be indication of further stress that should be identified by a professional.

GRADE CHANGES

The growing conditions and soil level of trees are subject to detrimental stress should they be changed during the course of construction. Raising the grade at the base of a tree trunk can have long-term negative consequences. This grade level should be maintained throughout the protected zone. This will also help in maintaining the drainage in which the tree has become accustomed.

INSPECTION

The property owner should establish an inspection calendar based on the recommendation provided by the tree specialist. This calendar of inspections can be determined based on several factors: the maturity of the tree, location of tree in proximity to high-use areas vs. low-use area, history of the tree, prior failures, external factors (such as construction activity) and the perceived value of the tree to the homeowner.

Assumptions and Limiting Conditions

No warranty is made, expressed or implied, that problems or deficiencies of the trees or the property will not occur in the future, from any cause. The Consultant shall not be responsible for damages or injuries caused by any tree defects, and assumes no responsibility for the correction of defects or tree related problems.

The owner of the trees may choose to accept or disregard the recommendations of the Consultant, or seek additional advice to determine if a tree meets the owner's risk abatement standards.

The Consulting Arborist has no past, present or future interest in the removal or retaining of any tree. Opinions contained herein are the independent and objective judgments of the consultant relating to circumstances and observations made on the subject site.

The recommendations contained in this report are the opinions of the Consulting Arborist at the time of inspection. These opinions are based on the knowledge, experience, and education of the Consultant. The field inspection was a visual, grade level tree assessment.

The Consulting Arborist shall not be required to give testimony, perform site monitoring, provide further documentation, be deposed, or to attend any meeting without subsequent contractual arrangements for this additional employment, including payment of additional fees for such services as described by the Consultant.

The Consultant assumes no responsibility for verification of ownership or locations of property lines, or for results of any actions or recommendations based on inaccurate information.

This Arborist report may not be reproduced without the express permission of the Consulting Arborist and the client to whom the report was issued. Any change or alteration to this report invalidates the entire report.

Should you have any further questions regarding this property, please contact me at (310) 663-2290.

Respectfully submitted,

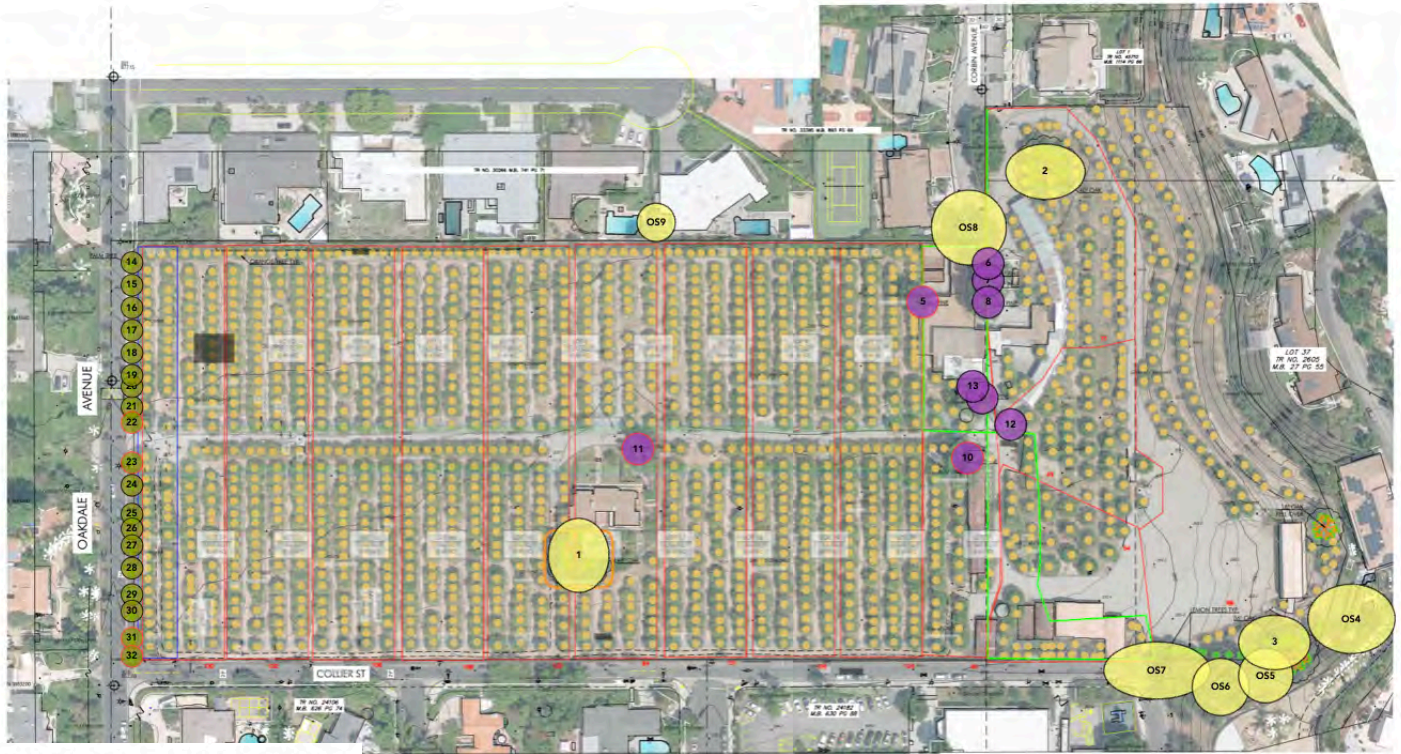


Lisa Smith

Registered Consulting Arborist #464
ISA Board Certified Master Arborist #WE3782B
ISA Tree Risk Assessor Qualified- Instructor
American Society of Consulting Arborists, Member



APPENDIX A.1 - TREE LOCATION - SURVEY MAP, REDUCED



Appendix A.1: Tree Locations on Project Survey

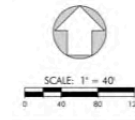
TREE LOCATION EXHIBIT

PROJECT SUMMARY	
Site Address	5300 Oakdale Ave
Location and/or Specific Plan	Woodland Hills
Project Description	21 New Single Family Homes
Proposed Floor Area - Lot Size (FAR)	X SF x SF
Number of Protected Trees on Site	3
Number of Recommended Removals	0

BOTHWELL RANCH
5300 OAKDALE AVE
TARZANA, CA 91356

A.P.N.: 2164-008-001, 2164-008-005
2164-008-006 & 2164-008-007

KEY	
	Protected Native Oak Tree
	Non-Protected Tree
	Agricultural Citrus Grove
	Street Tree
	Protective Fencing
	Tree For Removal



September 21, 2022

PREPARED BY:



PACIFIC COAST CIVIL, INC.
38141 AGOURA ROAD, SUITE 200
WOODLAND HILLS, CA 91367
TEL: (818) 888-8188
FAX: (818) 888-8188

OWNER:

BORSTEN ENTERPRISES
11166 WILSHIRE BOVD, SUITE 820
LOS ANGELES, CA
90024

SHEET: 1 OF 1

SUMMARY OF FIELD INSPECTION					
Tree #	Species	Status	DBH (")	Condition	Retain or Remove
1	Coast Live Oak <i>Quercus agrifolia</i>	Protected	48	Fair	Retain
2	Coast Live Oak <i>Quercus agrifolia</i>	Protected	33.5	Fair	Retain
3	Coast Live Oak <i>Quercus agrifolia</i>	Protected	36	Fair	Retain
5	Canary Pine <i>Pinus canariensis</i>	Non-Protected	36	Fair	REMOVE
6	Canary Pine <i>Pinus canariensis</i>	Non-Protected	34	Fair	Retain
7	Canary Pine <i>Pinus canariensis</i>	Non-Protected	32	Fair	Retain
8	Canary Pine <i>Pinus canariensis</i>	Non-Protected	38	Fair	Retain
9	Canary Pine <i>Pinus canariensis</i>	Non-Protected	30	Fair	Retain
10	Canary Pine <i>Pinus canariensis</i>	Non-Protected	30	Fair	REMOVE
11	Canary Pine <i>Pinus canariensis</i>	Non-Protected	30	Fair	REMOVE
12	Queen Palm <i>Spathoglauis romanzoffiana</i>	Non-Protected	18	Fair	Retain
13	Queen Palm <i>Spathoglauis romanzoffiana</i>	Non-Protected	18	Fair	Retain
14-32	California Fan Palm <i>Washingtonia filifera</i>	Street	22	Fair	4 removals
33	Citrus <i>Citrus sp</i>	Agricultural Citrus Grove	6" - 8"	Poor-very Poor	REMOVE
OS4	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	12	C	Retain
OS5	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	20, 20	C	Retain
OS6	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	24	C	Retain
OS7	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	36	C	Retain
OS8	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	24	C	Retain
OS9	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	15	D	Retain

TREE COUNT

Citrus Trees: 1,451

Palm Trees on Oakdale: 15 of 19 preserved

Palm Trees Preserved Parcel east: 2 preserved

Large Pines: 4 of 7 preserved

Oak Trees: 3 - 2 of which are on preserved east parcel and one preserved on western parcel

Total preserved in place and replanted citrus: 308 trees

Native trees in Preserve (to be donated in donation agreement): 50



PROJECT SUMMARY	
Site Address	5300 Oakdale Ave
Location and/or Specific Plan	Woodland Hills
Project Description	21 New Single Family Homes
Proposed Floor Area - Lot Size (FAR)	X SF : x SF
Number of Protected Trees on Site	3
Number of Recommended Removals	0

KEY	
	Protected Native Oak Tree
	Non-Protected Tree
	Remaining Agricultural Citrus Grove
	Street Tree
	Protective Fencing
	Tree For Removal

SUMMARY OF FIELD INSPECTION						
Tree #	Species	Status	DBH (")	Condition	Retain or Remove	
1	Coast Live Oak <i>Quercus agrifolia</i>	Protected	48	Fair	Retain	
2	Coast Live Oak <i>Quercus agrifolia</i>	Protected	33.5	Fair	Retain	
3	Coast Live Oak <i>Quercus agrifolia</i>	Protected	36	Fair	Retain	
5	Canary Pine <i>Pinus canariensis</i>	Non-Protected	36	Fair	REMOVE	
6	Canary Pine <i>Pinus canariensis</i>	Non-Protected	34	Fair	Retain	
7	Canary Pine <i>Pinus canariensis</i>	Non-Protected	32	Fair	Retain	
8	Canary Pine <i>Pinus canariensis</i>	Non-Protected	38	Fair	Retain	
9	Canary Pine <i>Pinus canariensis</i>	Non-Protected	30	Fair	Retain	
10	Canary Pine <i>Pinus canariensis</i>	Non-Protected	30	Fair	REMOVE	
11	Canary Pine <i>Pinus canariensis</i>	Non-Protected	30	Fair	REMOVE	
12	Queen Palm <i>Syagrus romanzoffiana</i>	Non-Protected	18	Fair	Retain	
13	Queen Palm <i>Syagrus romanzoffiana</i>	Non-Protected	18	Fair	Retain	
14-32	California Fan Palm <i>Washingtonia filifera</i>	Street	22	Fair	4 removals	
33	Citrus <i>Citrus sp</i>	Agricultural Citrus Grove	6" - 8"	Poor-very Poor	REMOVE	
OS4	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	12	C	Retain	
OS5	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	20, 20	C	Retain	
OS6	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	24	C	Retain	
OS7	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	36	C	Retain	
OS8	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	24	C	Retain	
OS9	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	15	D	Retain	

TREE COUNT

TREE COUNT

- Citrus Trees: 1,451
- Palm Trees on Oakdale: 15 of 19 preserved
- Palm Trees Preserved Parcel east: 2 preserved
- Large Pines: 4 of 7 preserved
- Oak Trees: 3 - 2 of which are on preserved east parcel and one preserved on western parcel

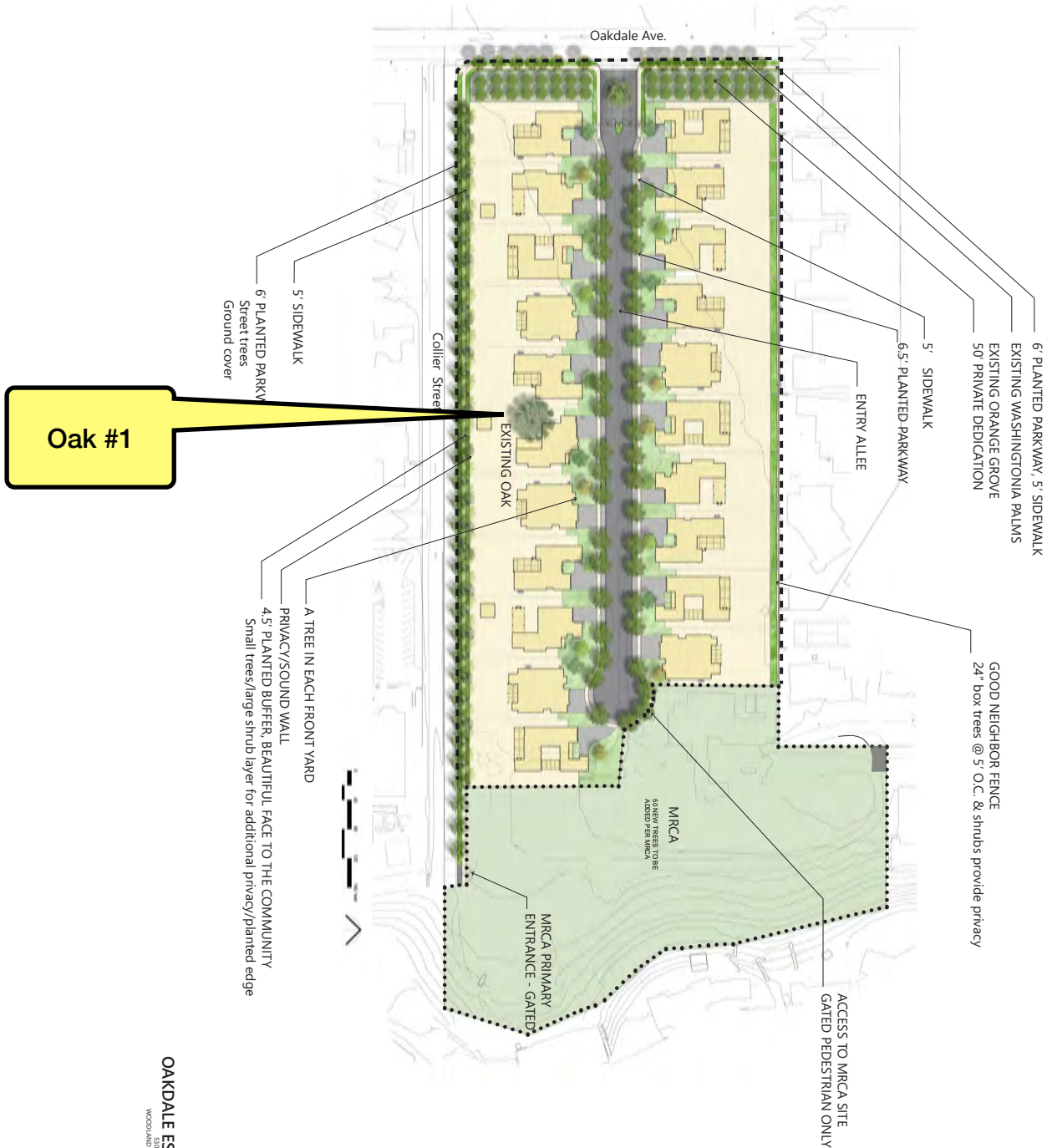
Total preserved in place and replanted citrus: 308 trees

Native trees in Preserve (to be donated in donation agreement): 50

APPENDIX A.3 - TREE REPLACEMENT MAP, Landscaping PLAN REDUCED

ILLUSTRATIVE SCHEMATIC LANDSCAPE PLAN

Toller Meyer Associates, Inc.
 Landscape Architecture & Planning - Urban Design
 10000 Wilshire Blvd., Suite 1000
 Culver City, CA 90230-3421
 310.309.8500 | 310.309.1515 | http://www.tollermeier.com



OAKDALE ESTATES
 WOODLAND HILLS, CA 91364
 01/2023

APPENDIX A.4 - TREE REPLACEMENT MAP, Landscaping PLAN REDUCED

PRELIMINARY TREE PLANTING PLAN Selected

TREE COUNT		
CENTER ALLEE	40	36" box Ulmus parvifolia, plant per plan
COLLIER AVE Parkway Inboard buffer	35	36" box Platanus racemosa, 30' O.C.
	31	36" box Chitalpa tashkentensis or equal, 30' O.C. offset from sycamores for privacy 'wall'
ENTRY SPECIMEN	1	60" box Olea Europea 'Swan Hill' multi trunk
NORTH PRIVACY EDGE	150	24" box Podocarpus gracilior or equal, planted 5' O.C.
FRONT YARD TREES	21	Minimum 24" box, various species that complement plant palette
TOTAL PROPOSED TREES	278	
EXISTING		
Washingtonia palms		
Oak: Oakdale Orange grove, 2 rows		

NEIGHBOR PRIVACY



Laurus nobilis



Podocarpus gracilior - tree or hedge
Fern Pine



Eleaocarpus decipiens
Japanese Blueberry Tree

ENTRY ALLEE

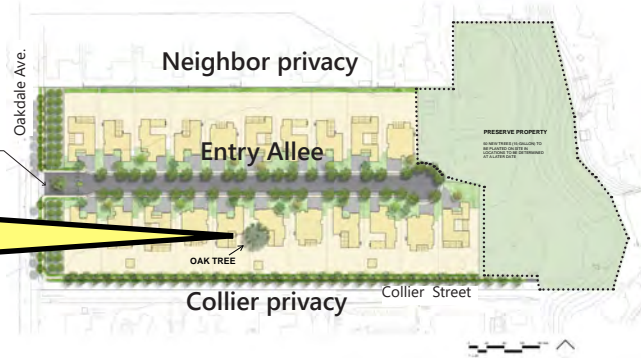


Ulmus parvifolia
True Green/Drake Elm
Rounded canopy, evergreen



Entry Gate Specimen Olive

Oak #1



ENTRY GATE SPECIMEN



Olea europea 'Swan Hill'
Fruitless Olive
Evergreen multi-trunk

COLLIER PRIVACY



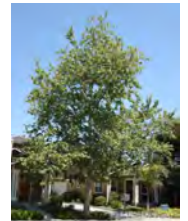
Rhus integrifolia
Lemonadeberry
Native



Heteromeles arbutifolia
Toyon
Native



Chitalpa tashkentensis 'Pink Dawn'
Pink Dawn Chitalpa
Airy structure, ornamental form/flower, deciduous



Platanus racemosa
California sycamore
Deciduous

12

APPENDIX B - PHOTOGRAPHS



PHOTO 1 - There are (19) nineteen Street Washingtonia robusta fan palms located in the ROW and considered Parkway Street Trees. City plans require road widening of Collier Street and construction of ingress/egress for this new housing development. City Department of Engineering was contacted, and they have agreed to reduce the required pavement section along Oakdale Avenue enough to preserve the remaining palm trees. Only 4 of the Mexican Fan palms will need to be removed along the east side of Oakdale Avenue. The remaining 15 street palms will receive root pruning and will be minimally impacted by the road widening. These palms will be retained and protected in place.

5300 Oakdale Ave

APPENDIX B - PHOTOGRAPHS



PHOTO 2 - Oak tree #1 is setback 10' - 6" from construction and will receive minimal impact. This tree will be retained and protected in place per the design, in Lot 16.

APPENDIX B - PHOTOGRAPHS



PHOTO 3 - Oak tree #1 is setback 10' 6" from construction and will receive minimal impact. This tree will be retained and protected in place per the design, in Lot 16.

APPENDIX B - PHOTOGRAPHS



PHOTO 4 - Protected Oak #2 oak is in the preserved land area and outside of the construction zone, will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 5 - Protected Oak #2 oak is in the preserved land area and outside of the construction zone, will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 6 - Protected Oak #3 oak is in the preserved land area and outside of the construction zone, will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 7 - Protected Oak #3 oak is in the preserved land area and outside of the construction zone, will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 8 - Protected oak tree OFF-SITE is outside of the construction zone, will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 9 - Protected OFF-SITE Oak #OS5 is outside of the adjacent preserved land where no construction will occur. It will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 10 - Protected OFF-SITE Oak #OS5 is outside of the construction zone, will receive no impact and will be retained and protected in place. In fact, this tree is offsite adjacent to the preserved land where no construction will occur.

APPENDIX B - PHOTOGRAPHS



PHOTO 11 - Protected OFF-SITE Oak #OS5 & OS6 are outside of the adjacent preserved land where no construction will occur. They will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 12 - Protected OFF-SITE Oak #OS7 is outside of the adjacent preserved land where no construction will occur. It will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 13 - Non-Protected canary pine. This tree will be impacted by the proposed construction and will require removal.

APPENDIX B - PHOTOGRAPHS

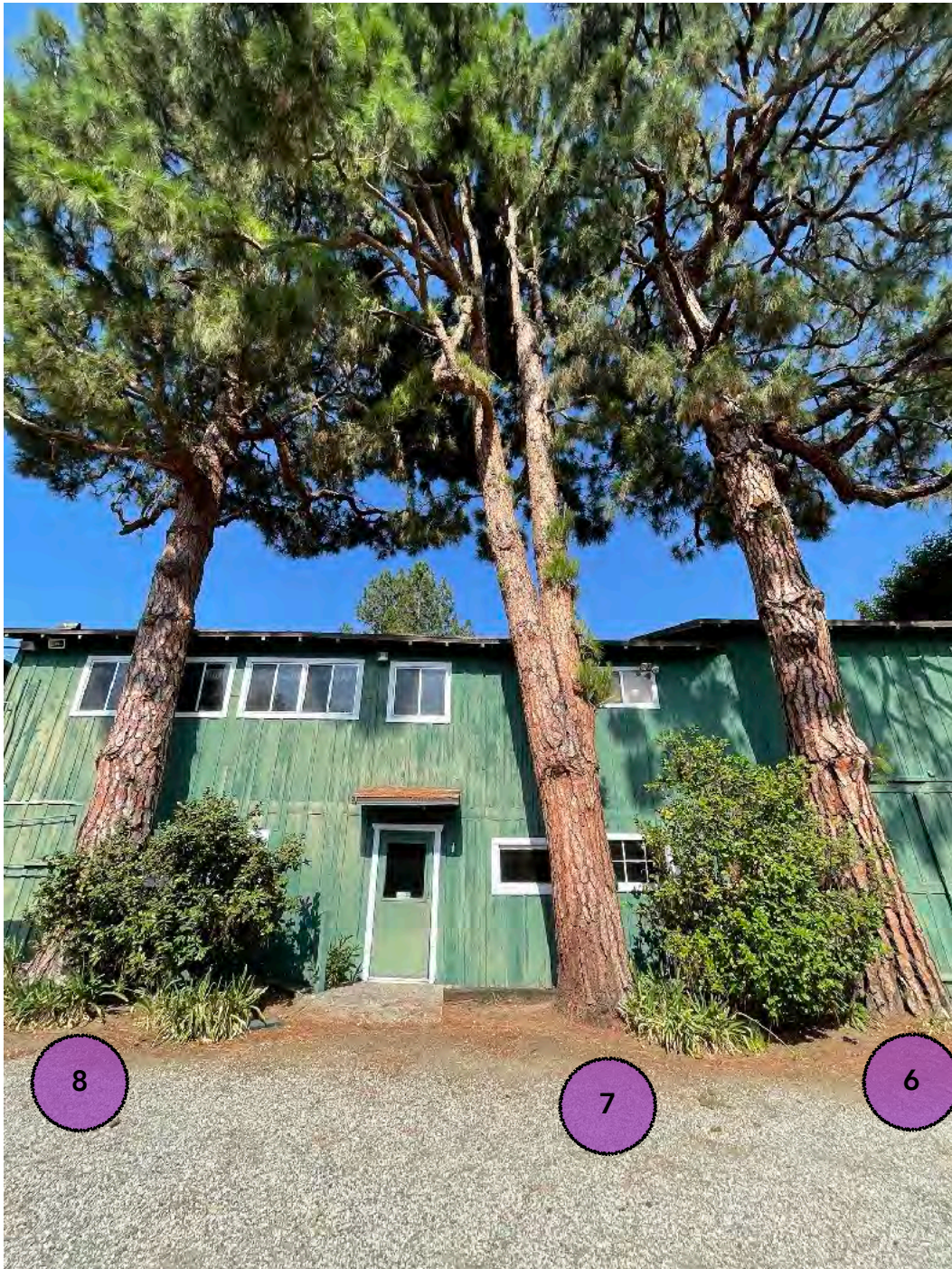


PHOTO 14 - Non-Protected canary pine - Located in the preserved area. These will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 15- Protected OFF-SITE Oak #OS8 is outside of the adjacent preserved land where no construction will occur. It will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 16 - Shows some of the agricultural citrus grove for removal.

APPENDIX B - PHOTOGRAPHS



PHOTO 17 - Shows some of the agricultural citrus grove for removal.

APPENDIX B - PHOTOGRAPHS



PHOTO 18 - Shows some of the agricultural citrus grove for removal.

APPENDIX B - PHOTOGRAPHS



PHOTO 19 - Shows protected OFF-SITE Oak #OS9 on neighboring property will receive no impact and will be retained and protected in place.

APPENDIX C - SUMMARY OF FIELD INSPECTION

Rating Code: A = Excellent, B = Good, C = Fair, D = Poor, E = Nearly Dead, F = Dead

Tree #	Species	Status	Location	DBH (")	Height (')	Spread (')	Summary of Condition	Retain or Remove
1	Coast Live Oak <i>Quercus agrifolia</i>	Protected	Lot 16 - Private Property	48	50	60	C	Retain
2	Coast Live Oak <i>Quercus agrifolia</i>	Protected	Preserved Area	33.5	40	55	C	Retain
3	Coast Live Oak <i>Quercus agrifolia</i>	Protected	Preserved Area	36	50	50	C	Retain
5	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Private Property	36	75	35	C	REMOVE
6	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Preserved Area	34	60	20	C	Retain
7	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Preserved Area	32	60	15	C	Retain
8	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Preserved Area	38	60	25	C	Retain
9	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Preserved Area	30	60	25	C	Retain
10	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Private Property	30	60	25	C	REMOVE
11	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Private Property	30	60	25	C	REMOVE
12	Queen Palm <i>Syagrus romanzoffiana</i>	Non-Protected	Preserved Area	18	45	15	C	Retain
13	Queen Palm <i>Syagrus romanzoffiana</i>	Non-Protected	Preserved Area	18	35	15	C	Retain
14	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
15	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
16	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
17	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
18	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
19	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
20	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain

APPENDIX C - SUMMARY OF FIELD INSPECTION

Rating Code: A = Excellent, B = Good, C = Fair, D = Poor, E = Nearly Dead, F = Dead

Tree #	Species	Status	Location	DBH (")	Height (')	Spread (')	Summary of Condition	Retain or Remove
21	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
22	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	REMOVE
23	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	REMOVE
24	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
25	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
26	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
27	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
28	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
29	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
30	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	Retain
31	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	REMOVE
32	California Fan Palm <i>Washingtonia filifera</i>	Street	Parkway Tree	22	75	10	C	REMOVE
33	Citrus <i>Citrus sp</i>	Agricultural Citrus Grove	Private Property	6" - 8"	15	15	D-E	1,143 Removals
OS4	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	Off-Site	12	25	15	C	Retain
OS5	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	Off-Site	20, 20	20	20	C	Retain
OS6	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	Off-Site	24	35	20	C	Retain
OS7	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	Off-Site	36	45	45	C	Retain
OS8	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	Off-Site	24	50	25	C	Retain
OS9	Coast Live Oak <i>Quercus agrifolia</i>	Off Site Protected	Off-Site	15	25	20	D	Retain

APPENDIX D - SUMMARY OF DATA

Table 1. Summary of Data - Total Protected Trees or Shrubs On Site

Coast Live Oak (<i>Quercus agrifolia</i>)	3
Number of Native Coast Live Oak trees to be removed	0
Number of Native Coast Live Oak trees to be minimally impacted by the construction	0
Number of Native Coast Live Oak trees not dead, to be retained, and/or where natural grade is unchanged	3
Total Protected Trees or Shrubs (DBH 4" or greater)	3
Total Protected Trees or Shrubs to be removed	0
Total Protected Trees or Shrubs to be minimally impacted	0
Total Protected Trees or Shrubs to be retained, and/or where natural grade is unchanged	3

APPENDIX D - SUMMARY OF DATA

Table 2. Schedule of Proposed Removals

Tree #	Species	Status	Condition	RECOMMENDATION	
				Retain or Remove	Reason for Removal
5	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Fair	Remove	Construction Impact
10	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Fair	Remove	Construction Impact
11	Canary Pine <i>Pinus canariensis</i>	Non-Protected	Fair	Remove	Construction Impact
22	California Fan Palm <i>Washingtonia filifera</i>	Street	Fair	Remove	Construction Impact
23	California Fan Palm <i>Washingtonia filifera</i>	Street	Fair	Remove	Construction Impact
31	California Fan Palm <i>Washingtonia filifera</i>	Street	Fair	Remove	Construction Impact
32	California Fan Palm <i>Washingtonia filifera</i>	Street	Fair	Remove	Construction Impact
	Citrus Citrus sp (1143 removals)	Agricultural Citrus Grove	Very Poor	Remove	Construction Impact

APPENDIX D - SUMMARY OF DATA

Table 3. Summary of Replacement

	Existing Trees to Be Removed	Trees to be Planted in Replacement
PROTECTED TREES OR SHRUBS Replaced 4:1	0	0
CITY OF L.A. STREET TREES Replaced 2:1	4	8
NON-PROTECTED SIGNIFICANT TREES 8" + DBH Replaced 1:1	3	3
TOTAL	7	11

Recommended Species and Size of Replacement Trees

Non-Protected Significant Canary Island Pine tree will be replaced at a one-to-one (1:1) ratio, to the satisfaction of the City of Los Angeles Department of City Planning.

Street trees will be replaced at a two-to-one (2:1) ratio, to the satisfaction of the Urban Forestry Division.

APPENDIX E - Dave Matias Citrus Evaluation

Bothwell Citrus Ranch Evaluation

At

**5300 Oakdale Avenue
Woodland Hills CA.**

Prepared for:

**Erik Pfahler
Borstein Enterprises
11766 Wilshire Boulevard
Suite 820
Los Angeles, CA 90025**

Prepared by:

**Dave Matias
Plant and Pest Consultant
1174 Bridgeport Rd.
Corona, California 92882
(951) 212-2315**

**ASCA Registered Consulting Arborist # 476
ISA Certified Arborist WC-0463A
C-27 ST. CONT. LIC. 599831
C.D.F.A. P.C.A. 74261
C.D.F.A. Q.A.L. 98669**

March 14, 2022

APPENDIX E - Dave Matias Citrus Evaluation

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Background and summary	1
Site inspection and Discussion	1-2
Citrus culture and Conclusion	2
Site Map	3
Site Photographs	4-5
Assumptions and Limiting Conditions	6

APPENDIX E - Dave Matias Citrus Evaluation

Bothwell Ranch Citrus

page 1 of 6

Scope of work

Evaluate existing Citrus Trees in their current state at 5300 Oakdale Avenue, Woodland Hills CA.

Background and Summary

The Bothwell Ranch dates to 1926. It was part of a 30-acre citrus operation with approximately 14 acres remaining. It is primary Valencia Orange. According to the ranch manager the orchard has been operating at a loss for many years and was last harvested in 2019. Substantial leaf loss, wilt and die-back indicates that these trees have been under watered for years. The orchard is in moderate to severe stress currently. Because of water cost, it has been curtailed for years according to the ranch manager.

Water became more expensive in the mid-1980s when the Los Angeles Department of Water and Power discontinued its bargain agricultural rate for farms. This forced many growers out of business. The Bothwell Ranch has been selling its assets to maintain the orchard. Even with water curtailment the costs of water alone exceed any potential revenue. Citrus needs regular irrigation to produce volume and quality fruit. When water is curtailed, the tree can survive for some time, but fruit production ceases and tree damage can become permanent.

Site Inspection and Discussion

A site inspection was conducted on March 14, 2022, with Albelardo the current ranch manager for the past 32 years. The orchard is in moderate to severe stress currently. Several crop years still hang on few of the trees but is shrunken, very soft and easily falls from touch. Substantial leaf loss, wilt and die-back indicates that these trees have been under watered for years. Many trees probably will not survive another season without ample water. Once citrus is allowed to dry out, restoring water normally will not restore the tree to its original healthy state.

A typical commercially operated citrus grove annually requires between 2.5-to-3.5-acre feet of water per acre of grove area, which is very expensive in a metropolitan area. Drought has plagued Southern California for decades. Citrus growers relied on winter rains to supplement their irrigation needs and incorporate fertility. Winter rain would wash trees of dust, aerial pollutants, and leach sodium out of the root zone from irrigation water. The last time this orchard was irrigated was by rainfall in December 2021. The orchard historical irrigation ran on a weekly schedule for decades up to 32 hour run time during the hotter times of the year or during Santa Ana winds conditions. Currently, it gets 4 hours occasionally to prevent it from completely drying out. Albelardo was planning on giving the orchard a light irrigation within a day or so after minor irrigation repairs.

Citrus suffers when the root system is too wet or too dry. Trees must maintain even soil moisture and cannot be allowed dry out between irrigations. Drying has a negative effect on fruit set, size, quality, and eventual death. Drying or excessive wet conditions can lead to increase susceptibility to insect and disease.

Citrus bark is very thin and normally is protected from sunburn from a dense leaf canopy. You should not be able to see through a healthy citrus tree. Substantial leaf loss has occurred exposing the interior of these trees to sunlight. Exposure to the interior of a tree can lead to bark sunscald that can permanently damage or kill a limb.

The main 9.6 acres portion of the grove contains Valencia orange. It is not known what variety of Valencia or rootstock were used here. There are trees of different age and size within rows. According to the ranch manager, most of the grove was replanted approximately 36 years ago. It appears that this citrus orchard had been well taken care of in the past. It has good tree uniformity with few gaps and dead trees.

It appears that the original orchard was furrow irrigated. Parts of the original irrigation system remain but not functional. At some point the irrigation was converted to a micro irrigation system. The current system has a mixture of different size sprinklers preventing good irrigation uniformity. This creates a situation where some trees receive too much water while others not enough. Some minor irrigation damage was observed probably from coyotes looking for water.

Weed control is good at this time, which is to be expected from the lack of irrigation and rainfall. Herbicides had been used sparingly in the past but have not been used recent times. Current weed control is performed with hand tools, weed eater, or scraping with a tractor.

APPENDIX E - Dave Matias Citrus Evaluation

Bothwell Ranch Citrus

page 2 of 6

This site has been relatively insect pest free and received very little if any pest control over the years. 2019 was the last time this orchard was sprayed with an insecticide to comply with regulatory requirements to move fruit off site.

The eastern portion of the ranch approximately 4 acres is mostly flat. It has open ground that new citrus or other gardening actives can expand into. It has approximately 1.25 acres of mixed citrus and contains the oldest trees on the ranch. Valencia, navel, grapefruit, lemon, and mandarin and tangerine were observed. Many of the older trees have substantial die-back. Some of the older tree's express disease issues such as psoriasis and phytophthora and should be considered for removal. These issue and others are now prevented by using newer bud lines and rootstocks.

The current system has a mixture of different size sprinklers preventing good irrigation uniformity. This creates a situation where some trees receive too much water while others not enough. The system was turned off and its performance could not be verified. It appears this system is worn out and probably has minor leaks that would affect the entire system. There are trees that are about dead and still being irrigated.

The most easterly portion of the 4 acres has a west exposure (approximately 1.2 acres) slopes upward to existing homes. This area has several terraces, has the poorest soil conditions, and is the driest portion of the property. Because of slope drainage and sun exposure this area is difficult to irrigate and maintain moisture. The remainder of the acreage is occupied by shop building, storage sheds and a large graveled open space.

Citrus Culture and Conclusion

Citrus is a sub-tropical plant and requires a long-term commitment to work. It requires good soil, fertility, and even soil moisture to survive and be productive. Growers make a sizable investment to establish an orchard. It takes years before production to start, thus starting with the right tree is critical. It takes several years to produce a certified tree in the nursery. Growers contract with commercial citrus nurseries that certify variety, pest, and disease-free trees. Before planting growers test soil to determine the best rootstock to use in their soil and be pest free. Commercial citrus nurseries graft the desired fruit variety onto to the rootstock using the same bud source. This maintains tree and fruit uniformity within the orchard. It can take five to seven years before an orchard starts producing a reasonable crop.

Citrus inputs such as water, fertilizer, pruning, and pest control have been studied for more than a century. There are many tools for the grower to use to maximize quality and production. Using weather data and soil moisture devices growers can fine tune moisture needs. Soil and leaf analysis can fine tune nutritional needs. Regular orchard scouting for pest prevent serious outbreaks. With proper care citrus can produce for over 100 years. It appears that there may be trees that date back to the time when this orchard was established.

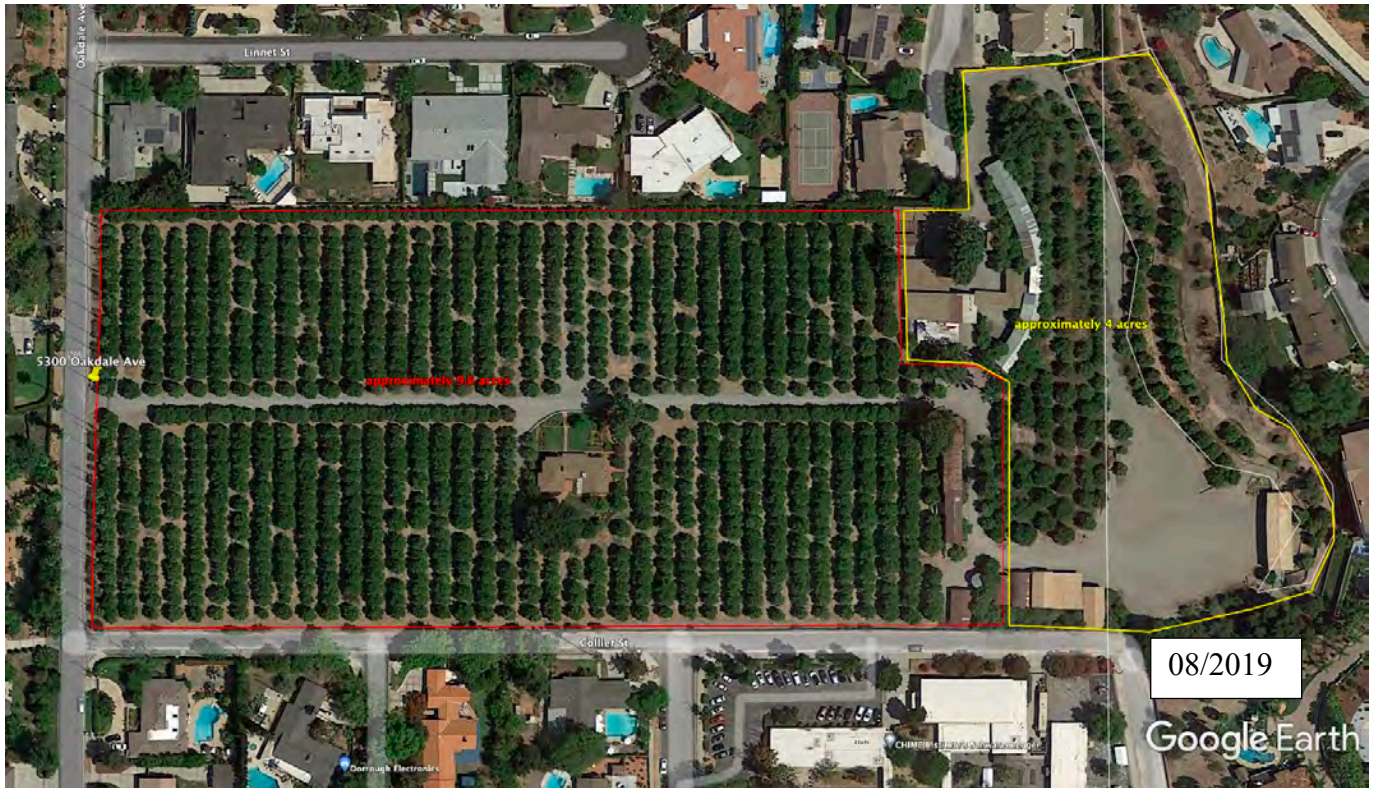
The local citrus industry infrastructure that growers relied on to get their crops harvested in Southern California disappeared when, land value, taxes, water, labor, insurance, packing facilities costs and other inputs became increasingly expensive. This site has been operating at a loss for many years.

As the farming infrastructure has disappeared in this region drastically driving up costs and coupled with high water costs and lower priced fruit from other areas, it has made it impossible for a citrus grove to be financially feasible in the Los Angeles metropolitan area.

A citrus grove requires regular active maintenance and operation to keep it healthy and productive. Unfortunately, continued lack of irrigation, fertilizers, pruning, weed and pest control will continue to stress the trees and eventually lead to death of the orchard within the next few years. Some trees in the orchard appear to be relatively healthy and may recover after several years if inputs are restored. They still may be suitable for landscaping and non-commercial fruit production if handled appropriately.

APPENDIX E - Dave Matias Citrus Evaluation

Site Map



Google Earth aerial from 2019 shows trees with dense deep green canopies. Today most trees have die-back and have lost a substantial amount of leaf cover.

APPENDIX E - Dave Matias Citrus Evaluation

Bothwell Ranch Citrus

page 4 of 6

Pictures from the western 9.6-acre portion of the ranch



Three years of crop. Note leaf drop.



View along main drive looking west toward Oakdale. Note leaf drop and die-back.

Pictures from the eastern 4 acres of the ranch



View from slope looking southwest toward shop building showing trees in various stages of decline.



View of many dead trees behind shop area.

5300 Oakdale Ave

Dave Matias Plant and Pest Consultant

March 14, 2022

APPENDIX E - Dave Matias Citrus Evaluation

Bothwell Ranch Citrus

page 5 of 6

Pictures from proposed area to be preserved.



View west toward Oakdale along main drive.



View from north-east corner looking south.



View of avocado and weeds in severe water stress. Top of slope looking north.

5300 Oakdale Ave



View of Building 9. Grounds are clean and well maintained.

APPENDIX E - Dave Matias Citrus Evaluation

Bothwell Ranch Citrus

page 6 of 6

Assumptions and Limiting Conditions

- 1 Care has been taken to obtain all information from reliable sources. All data has been verified insofar as possible; however, the arborist can neither guarantee nor be responsible for the accuracy of information provided by others.
- 2 Loss or alteration of any part of this report invalidates the entire report.
- 3 Possession of this report or copy thereof does not imply right of publication or use for any purpose by any other than the person to whom it is addressed, without the prior expressed written or verbal consent of the consulting arborist.
- 4 The consulting arborist shall not be required to give testimony or to attend court, provide additional services or attend meeting by reason of this report unless subsequent contractual arrangements are made, including payment of an additional fee for such services as described in the fee schedule and contract of engagement.
- 5 Sketches, diagrams, graph, and photographs in this report, being intended as visual aids, are not necessary to scale and should not be construed as engineering or architectural reports or surveys.
- 6 Unless expressed otherwise information contained in this report covers only those items that were examined and reflects the condition of those items at the time of inspection and the inspection is limited to visual examination of accessible items without dissection, excavation, or coring.
- 7 This inspection does not warranty or guarantee that these trees are free of defects from hidden or unapparent conditions expressed or implied. The conclusions of this report are derived from visual inspection. No samples were taken to confirm or deny the presence of disease. I hereby certify that the statements furnished above represent the data and information, and that the facts, statements, and information presented herein are true and correct to the best of my knowledge and believe.



Dave Matias
Plant and Pest Consultant

Exhibit G

February 3, 2023
J.N.: 3064.00

Mr. Erik Pfahler
Borstein Entreprises
11766 Wilshire Boulevard, Suite 820
Los Angeles, CA 90025

Subject: Assessment for Property Designation as Prime Farmland, Proposed Residential Development, 5300 Oakdale Avenue, Woodland Hills, California

Dear Mr. Pfahler,

We have prepared this correspondence to address the issue concerning the subject property designation as Prime Farmland by the Department of Conservation. Therefore, we have analyzed the site conditions using the Land Evaluation and Site Assessment (LESA) Model as provided by the California Department of Conservation, 1997 Instruction Manual (updated 2011).

Findings

The California Department of Conservation uses the LESA formula to make determinations of the potential significance of a project's conversion of agricultural lands during the Initial Study phase of the CEQA review process. Scoring thresholds are based upon both the total LESA score as well as the component Land Evaluation (LE) and Site Assessment (SA) sub-scores. In this manner, the scoring thresholds are dependent upon the attainment of a minimum score for the LE and SA sub-scores so that a single threshold is not the result of heavily skewed sub-scores (i.e., a site with a very high LE score, but a very low SA score, or vice versa). Table 9 provided in the California Department of Conservation Instruction Manual presents the LESA scoring thresholds.

The LESA model utilizes various metrics to analyze and assign a score to a property. The model is broken into two main categories designated as Land Evaluation (LE) and Site Assessment (SA). Albus and Associates has addressed the LE section while Dave Matias, the client's agriculture specialist and consulting arborist, has addressed the SA section.

The LE section is broken into two parts and they are identified as the Land Capability Classification (LCC) and the Storie Index. The LCC indicates the suitability of soils for most kinds of crops, while the Storie Index provides a numeric rating of the relative degree of suitability or value of a given soil for intensive agriculture. Each are assigned a weighting factor of 25% for a total of 50% of the overall score for the LESA model.

The LCC is currently the most widely available source of information on land quality with several resources available online to determining scores. However, the Storie Index is more subjective and qualified soil scientists are generally needed to determine an appropriate score. As such, the LESA model allows the Land Evaluation section to rely solely on the LCC score with a weighting factor of 50% of the overall LESA score. For this evaluation, we have opted to only use the LCC value for the

LE section and thereby assign the LCC a 50% weighting in the overall LESA score and no weighting to the Storie Index.

The subject site has a long history of producing oranges but over the last few decades has relied heavily on offsite water supplies to irrigate the site. We understand that as a result of the increased need to import water for irrigation at the site and the continued draught conditions in the region, the Los Angeles Department of Water and Power will no longer allow water they supply to be used for agricultural purposes at the site. A LCC rating for a site depends on whether the site is irrigated or non-irrigated. Due to the restrictions placed on the site, the site is now non-irrigated and the LCC score is based on non-irrigation. According to the USDA Natural Resources Conservation Service, Web Soil Survey (WSS), the site has three different Soil Map Units. Results of the WSS search are provided in Appendix A. The LCC Class for each zone is provided by the WSS based on the Soil Map Unit listed. The area of each of these three zones was determined as a percentage of the total property area as shown on the WSS map in Appendix A. The area of each unit, LCC for each zone, the individual LCC ratings, and the resulting LCC scores are indicated on the attached Land Evaluation Worksheet. Using the worksheet, an overall LCC score of **50.76** was calculated. By applying a weighting factor of 50%, a Land Evaluation subtotal score is **25.38**.

Dave Matias has analyzed the section related to Site Assessment as summarized below:

Site Assessment (Includes four components):

1. The Project Size Rating

The Project Size rating is based upon identifying acreage figures for three separate groupings of soil classes within the project site. The property only contains 11.8 acres of class III soils and a less significant area of 2.1 acres of class IV soil.

Score: 10

2. The Water Resources Availability Rating

The site is located in the City of Los Angeles and must use expensive domestic Municipal water for irrigation, making the cost of irrigation infeasible. Although water is available through the LADWP, the water rates are so high it makes it infeasible to use this source. Additionally, no well water is allowed or available. Furthermore, the site is located in a dry hot climate, so without irrigation farming would not be feasible. The closest option available on Table 5. Water Resource Availability Scoring is Option 9.

Score: 45

3. The Surrounding Agricultural Land Rating

The Surrounding Agricultural Land Rating is designed to provide a measurement of the level of agricultural land use for lands in close proximity to a subject project. This score is determined by evaluating the subject site in relation to the broader adjacent agricultural area identified as the "Zone of Influence". Applying the prescribed formula to calculate the Zone of Influence it was determined to be 276 acres. The subject site is 14.07 acres. The result of these factors equals 0.05%. ($14/276 \text{ acres} = .005$). applying this ratio to Table 6 equals a score of zero.

Score: 0

4. The Surrounding Protected Resource Land Rating

The Surrounding Protected Resource Land Rating is essentially an extension of the Surrounding Agricultural Land Rating, and is scored in a similar manner. Protected resource lands are those lands with long term use restrictions that are compatible with or supportive of agricultural uses of land (i.e.- Williamson Act contracted lands, Publicly owned lands maintained as park, forest, or watershed resources, Lands with agricultural, wildlife habitat, open space, or other natural resource easements that restrict the conversion of such land to urban or industrial uses). Similar to the Surrounding Agricultural Land Rating, this score is determined by evaluating the subject site in relation to the broader adjacent Protected Resource Lands identified as the "Zone of Influence". Applying the prescribed formula to calculate the Zone of Influence it was determined to be 276 acres. The subject site is 14.07 acres. The result of these factors equals 0.05%. (14/276 acres = .005). applying this ratio to Table 6 equals a score of zero.

Score: 0

These factors were then incorporated into the worksheet attached in Appendix A.

Scoring thresholds are based upon the total LESA score and in some cases the component LE and SA sub-scores (where LESA scores are between 40 and 79 points). Combining the LE and SA factors summarized above, the **overall LESA score is 33.6**.

When applying this score to Table 9 of Section IV. "California Agricultural LESA Scoring Thresholds - Making Determinations of Significance Under CEQA" shown below, the result categorizes the subject property as: "Not Considered Significant".

Table 9. California LESA Model Scoring Thresholds

Total LESA Score	Scoring Decision
0 to 39 Points	Not Considered Significant
40 to 59 Points	Considered Significant <u>only</u> if LE <u>and</u> SA subscores are each <u>greater</u> than or equal to 20 points
60 to 79 Points	Considered Significant <u>unless</u> either LE <u>or</u> SA subscore is <u>less</u> than 20 points
80 to 100 Points	Considered Significant

Closing

We appreciate this opportunity to be of service to you. If you should have any questions regarding the contents of this correspondence, please do not hesitate to call.

Sincerely,

ALBUS & ASSOCIATES, INC.



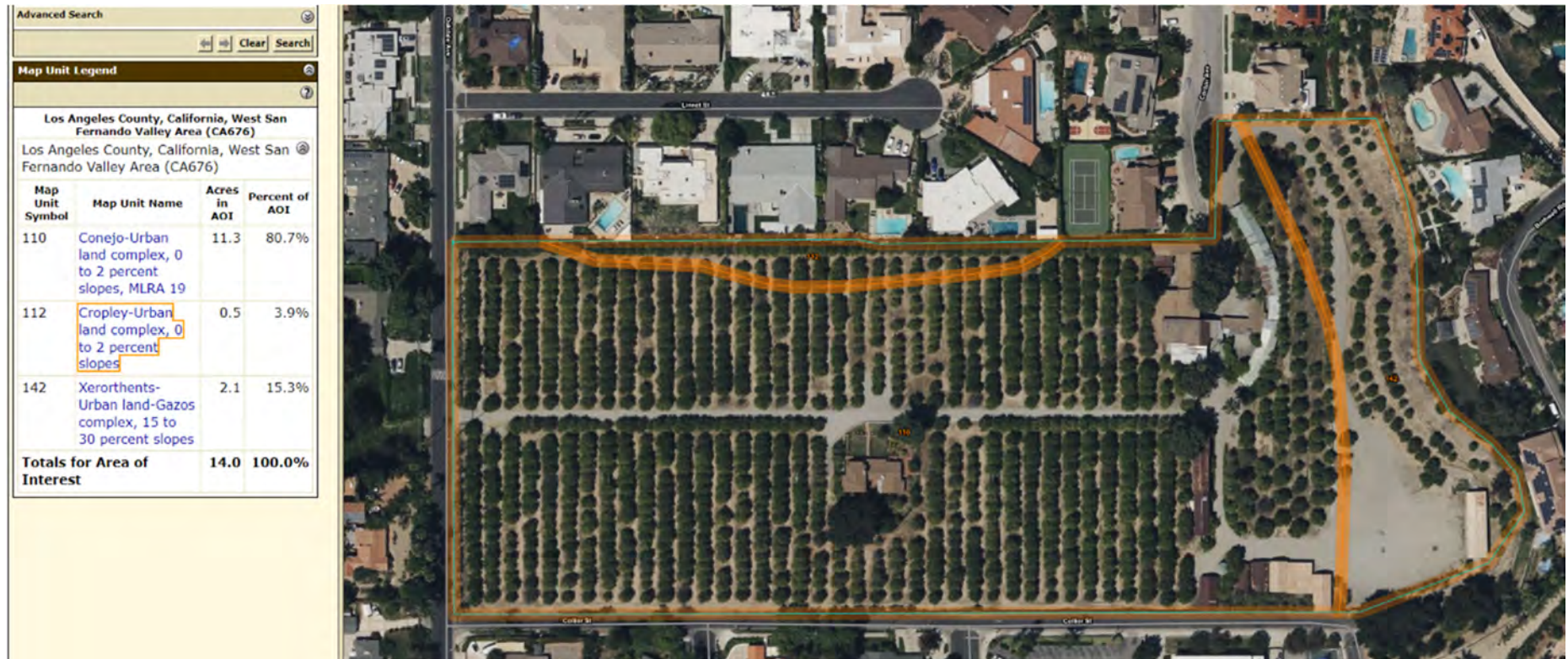
David E. Albus
Principal Engineer
GE 2455



Attachments: Appendix A- California Agricultural LESA Worksheets

APPENDIX A

California Agricultural LESA Worksheets



From the USDA Natural Resources Conservation Service, Web Soil Survey (WSS)

Appendix A. California Agricultural LESA Worksheets

NOTES

Calculation of the Land Evaluation (LE) Score

Part 1. Land Capability Classification (LCC) Score:

- (1) Determine the total acreage of the project.
- (2) Determine the soil types within the project area and enter them in **Column A** of the **Land Evaluation Worksheet** provided on page 2-A.
- (3) Calculate the total acres of each soil type and enter the amounts in **Column B**.
- (4) Divide the acres of each soil type (**Column B**) by the total acreage to determine the proportion of each soil type present. Enter the proportion of each soil type in **Column C**.
- (5) Determine the LCC for each soil type from the applicable Soil Survey and enter it in **Column D**.
- (6) From the LCC Scoring Table below, determine the point rating corresponding to the LCC for each soil type and enter it in **Column E**.

LCC Scoring Table

LCC Class	I	Ile	Ils,w	IIle	IIls,w	IVe	IVs,w	V	VI	VII	VIII
Points	100	90	80	70	60	50	40	30	20	10	0

- (7) Multiply the proportion of each soil type (**Column C**) by the point score (**Column E**) and enter the resulting scores in **Column F**.
- (8) Sum the LCC scores in **Column F**.
- (9) Enter the LCC score in box <1> of the **Final LESA Score Sheet** on page 10-A.

Part 2. Storie Index Score:

- (1) Determine the Storie Index rating for each soil type and enter it in **Column G**.
- (2) Multiply the proportion of each soil type (**Column C**) by the Storie Index rating (**Column G**) and enter the scores in **Column H**.
- (3) Sum the Storie Index scores in **Column H** to gain the Storie Index Score.
- (4) Enter the Storie Index Score in box <2> of the **Final LESA Score Sheet** on page 10-A.

Land Evaluation Worksheet

Land Capability Classification (LCC) and Storie Index Scores

A	B	C	D	E	F	G	H
Soil Map Unit	Project Acres	Proportion of Project Area	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
110	11.3	80.7%	3c	60	48.42		
112	0.5	3.9%	3s	60	2.34		
142	2.1	15.3%	8	0	0		
Totals		(Must Sum to 1.0)		LCC Total Score	50.76	Storie Index Total Score	

Site Assessment Worksheet 1.

Project Size Score

	I	J	K
LCC Class	LCC Class	LCC Class	LCC Class
I - II	III	IV - VIII	
Total Acres			
Project Size Scores			

Highest Project Size Score

NOTES

Final LESA Score Sheet

Calculation of the Final LESA Score:

- (1) Multiply each factor score by the factor weight to determine the weighted score and enter in Weighted Factor Scores column.
- (2) Sum the weighted factor scores for the LE factors to determine the total LE score for the project.
- (3) Sum the weighted factor scores for the SA factors to determine the total SA score for the project.
- (4) Sum the total LE and SA scores to determine the Final LESA Score for the project.

	Factor Scores	Factor Weight	Weighted Factor Scores
LE Factors			
Land Capability Classification	<1> 50.76	0.25 0.5	25.38
Storie Index	<2> N.A.	0.25	N.A.
<i>LE Subtotal</i>		0.50	25.38
SA Factors			
Project Size	<3> 10	0.15	1.5
Water Resource Availability	<4> 45	0.15	6.75
Surrounding Agricultural Land	<5> 0	0.15	0
Protected Resource Land	<6> 0	0.05	0
<i>SA Subtotal</i>		0.50	8.25
Final LESA Score			33.63

For further information on the scoring thresholds under the California Agricultural LESA Model, consult Section 4 of the Instruction Manual.