

**FINAL EIR APPENDIX A
NOTICE OF PREPARATION, INITIAL STUDY
& RESPONSES TO IS/NOP**



NOTICE OF PREPARATION

PROJECT TITLE: LOS ANGELES STATE HISTORIC PARK MASTER DEVELOPMENT PLAN

The California Department of Parks and Recreation is the Lead Agency under the requirements of the California Environmental Quality Act and is considering the preparation of an environmental document for the project identified above. We need to know the views of your agency or organization as to the scope and content of the environmental information that is germane to your agency's or organization's statutory responsibilities or interest in connection with the proposed project. If you do not belong to an agency or organization, this notice has been sent to inform you that detailed planning for the Los Angeles State Historic Park is commencing and to provide you with an early opportunity to learn more about the project at the Public Information Meeting and discuss the project. If you have issues that are important to you, a response to the Notice of Preparation will provide you the opportunity to request that the EIR identify these issues.

Your response must be sent to the address below not later than thirty (30) days after the receipt of this notice. We would appreciate the name and mailing address of a contact person to direct future correspondence.

PROJECT DESCRIPTION: To meet requirements set forth in Title 14 of the California Administration Code, The California Department of Parks and Recreation is preparing the Los Angeles State Historic Park Master (LASHP) Development Plan and initiating the environmental review process under the California Environmental Quality Act (CEQA). The Park General Plan/EIR (SCH # 2003031096) was approved by the State Park and Recreation Commission on June 10, 2003. The Master Development Plan synthesizes the General Plan/EIR goals and guidelines into design concepts that will be implemented in phases as funding becomes available. LASHP is located in the City of Los Angeles between N. Broadway and N. Spring Street and in close proximity to the Chinatown Gold Line Station. Interim park uses have provided for immediate public use of the Park as permanent planning and a long-term vision for the Park were developed. The Master Development Plan represents the design footprint of the long-term vision.

The 32-acre site occupies a critical nexus within the geography and cultural history of Los Angeles. LASHP is located at the foot of the Elysian Hills on the previous site of the historic Southern Pacific River Station Railyard, between the channelized Los

Angeles River and the expanding downtown core of the city. Surrounded by several diverse downtown neighborhoods, the Park's proposed long-term development design will express many of the interwoven histories and the multi-cultural significance of this site, while satisfying a broad range of year round recreational opportunities. The LASHP Master Development Plan includes the potential re-creation of more than ten acres of natural habitats that long ago vanished from the heart of the city, and blends the historical importance and narratives of the site with programs and environments that aim to fulfill the goal of establishing a major public open space and destination for future generations to celebrate the past, present, and future of Los Angeles. The design vision would incorporate partnerships with outside agencies and organizations and would occur in phases as approvals and funding became available.

The proposal for the park's organizational structure is derived from the linear grain of the historic railyard, with more hardscape park uses grouped closer to downtown and more resource-based uses biased towards the river. The downtown end of the Park would be activated by a Welcome Station/ Café (park orientation and food), a large Interactive Interpretive Fountain civic gathering area (water play and visual gateway), and an Interpretive Play Area (exercise and education). A "Railyard Plaza," would span the length of the N. Spring Street frontage, unifying this long edge of the project as a linear garden environment. This is planned to ensure that the pedestrian-friendly public realm of the park extends to the street and to accommodate on-site parking and flexible areas for special events, markets and festivals.

The river end of the park draws its inspiration from the Los Angeles River as the historic lifeblood of the city and a center of local biodiversity with a ground-breaking proposal to create over five acres of wetland and riparian habitats, and an additional five acres of transitional and upland habitats. These wet and dry ecologies would allow visitors to experience the incredible biological richness of the historic river corridor and may incorporate water cleansing bio-swales as a sustainability feature at this natural gateway into the site. Working in concert with these habitat zones, an Ecology Center along the edge of N. Spring Street will facilitate public access to a wide range of indoor and outdoor interpretive, educational, community and recreational programs as well as provide a possible restaurant venue.

At the heart of the park would be a five-acre multi-use lawn and performance venue that is oriented to a new plaza stage that would sit above the exact location of the archaeological remains of the historic turntable and roundhouse of the rail yard. As a new cultural nexus, the stage would be designed to protect and potentially expose some of these archaeological features. In doing so it would reference this railroad hub and recall the site's former robust industrial use and this important era in the history of the site, the city and the country. Spanning across the Park from the top of the Welcome Station to the North Broadway a fountain bridge will allow important access from the neighborhoods atop the adjacent bluff and Elysian Park and will provide shade, interpretive viewpoints, and a refreshing 'rain' as relief from the hot Los Angeles sun.

Interpretive paths and 'portals' thread throughout the entire Park to offer visitors a variety of learning, reflective, and interactive experiences that reveal, illuminate, and expand on the natural, cultural, industrial and agricultural facets of the site by merging contemporary technologies and historic cultural references. This will position the Los Angeles State Historic Park within the 21st Century context and allow it to remain

compatible with evolving technologies and to incorporate those future cultural histories as they develop.

The California Department of Parks and Recreation (CDPR) is working with a design team led by Hargreaves Associates, as Prime Consultant and Design Lead. CDPR, along with Hargreaves Associates, is coordinating the efforts of an interdisciplinary design team, and is supported by Michael Maltzan Architecture for the development of the building programs and architectural design and Ralph Appelbaum Associates for the integration of interpretive aspects throughout the project.

POSSIBLE EFFECTS AND MITIGATIONS: The project has potential effects on aesthetics, air quality, cultural and community resources, erosion and water quality, noise, land use and urban planning, public safety, recreation, transportation, and public utilities. It is anticipated that these potential effects will either be minor, avoided through careful planning and coordination, or will utilize mitigation measures and policies to reduce potential impacts of future projects and activities to a level below significance. However, additional environmental review may be conducted as related future projects and any corresponding mitigation measures are proposed.

PUBLIC MEETINGS: The California Department of Parks and Recreation has an active public involvement program for the planning and development of facilities at Los Angeles State Historic Park. A Public Information Meeting will take place on Thursday, November 20, 2008 between 6:30 and 8:00 PM at the Los Angeles Conservation Corps Clean & Green Headquarters at 1400 N. Spring Street, Los Angeles, CA. An overview of the design concepts and project implementation will be presented and the planning team will respond to questions from the public. Notices associated with the project's CEQA review are available at two websites: http://www.parks.ca.gov/?page_id=25022 and http://www.parks.ca.gov/?page_id=983

PLAN DEVELOPMENT & ENVIRONMENTAL REVIEW: Once written and prepared, the Los Angeles State Historic Park Master Plan Draft EIR will be made available for public review and comment in accordance with the California Environmental Quality Act (CEQA). The Draft EIR will then be refined, and responses to public comments prepared. The Los Angeles State Historic Park Final EIR with appropriate changes and responses to comment will then be submitted for approval by the California Department of Parks and Recreation Deputy Director of Operations.

DEPARTMENT OF PARKS AND RECREATION CONTACT PERSON:

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(619) 220-5300
(619) 220-5400 (fax)

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers, except "No Impact", that are adequately supported by the information sources cited. A "No Impact" answer is adequately supported if the referenced information sources show that the impact does not apply to the project being evaluated (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on general or project-specific factors (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must consider the whole of the project-related effects, both direct and indirect, including off-site, cumulative, construction, and operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether that impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate when there is sufficient evidence that a substantial or potentially substantial adverse change may occur in any of the physical conditions within the area affected by the project that cannot be mitigated below a level of significance. If there are one or more "Potentially Significant Impact" entries, an Environmental Impact Report (EIR) is required.
4. A "Mitigated Negative Declaration" (Negative Declaration: Less Than Significant with Mitigation Incorporated) applies where the incorporation of mitigation measures, prior to declaration of project approval, has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact with Mitigation." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR (including a General Plan) or Negative Declaration [CCR, Guidelines for the Implementation of CEQA, § 15063(c)(3)(D)]. References to an earlier analysis should:
 - a) Identify the earlier analysis and state where it is available for review.
 - b) Indicate which effects from the environmental checklist were adequately analyzed in the earlier document, pursuant to applicable legal standards, and whether these effects were adequately addressed by mitigation measures included in that analysis.
 - c) Describe the mitigation measures in this document that were incorporated or refined from the earlier document and indicate to what extent they address site-specific conditions for this project.
6. Lead agencies are encouraged to incorporate references to information sources for potential impacts into the checklist or appendix (e.g., general plans, zoning ordinances, biological assessments). Reference to a previously prepared or outside document should include an indication of the page or pages where the statement is substantiated.
7. Explanation(s) of each issue should identify:
 - a) the criteria or threshold, if any, used to evaluate the significance of the impact addressed by each question and
 - b) the mitigation measures, if any, prescribed to reduce the impact below the level of significance.

ENVIRONMENTAL (INITIAL STUDY) CHECKLIST

I. BACKGROUND INFORMATION

Project Title: Los Angeles State Historic Park Master Development Plan

Project ID#
PCA#

Contact Person: Tina Robinson, Environmental Coordinator **Telephone:** (619) 220-5300

Location: Los Angeles State Historic Park, City of Los Angeles, Los Angeles County

Checklist Date: November 2008

Project Description:

The California Department of Parks and Recreation is preparing the Los Angeles State Historic Park Master (LASHP) Development Plan and initiating the environmental review process under the California Environmental Quality Act (CEQA). The Park General Plan/EIR (SCH # 2003031096) was approved by the State Park and Recreation Commission on June 10, 2003. The Master Development Plan synthesizes the General Plan/EIR goals and guidelines into design concepts that will be implemented in phases as funding becomes available. The 32-acre site occupies a critical nexus within the geography and cultural history of Los Angeles. LASHP is located at the foot of the Elysian Hills on the previous site of the historic Southern Pacific River Station Railyard, between the channelized Los Angeles River and the expanding downtown core of the city. Surrounded by several diverse downtown neighborhoods, the Park's proposed long-term development design will express many of the interwoven histories and the multi-cultural significance of this site, while satisfying a broad range of year round recreational opportunities. The LASHP Master Development Plan includes the potential re-creation of more than ten acres of natural habitats and blends the historical importance and narratives of the site with programs, environments, and built structures to establish a major public open space and destination for future generations to celebrate the past, present, and future of Los Angeles. The site would include gateways, ecology demonstration projects, and ecology center, civic gathering and play areas, pathways, a lawn and performance venue, and cultural interpretive themes and sites.

II. ENVIRONMENTAL CHECKLIST

| | <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|--|---|--|---|--------------------------|
| 1. AESTHETICS. | | | | |
| <u>ISSUES</u> | | | | |
| Would the project: | | | | |
| a) Have a substantial adverse effect on a scenic vista? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

COMMENTS

The setting is a partially developed park located within a heavily urbanized light commercial/industrial area. There are residential areas nearby and ongoing planning efforts may bring new housing and mixed uses within close proximity. Design will be developed to maximize park views, attributes and goals identified in the General Plan.

PROPOSED MITIGATION

Design of the Park's built features will incorporate public, professional, and other stakeholder concepts in accordance with the General Plan to develop a unique urban park that incorporates cultural, community and natural features.

| | | | |
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| <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|---|--|---|----------------------|

2. AGRICULTURAL RESOURCES.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997), prepared by the California Department of Conservation as an optional model for use in assessing impacts on agricultural and farmland. Would the project:

ISSUES

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

COMMENTS:

Although the Park has been used historically for agriculture, it is fully located within an urban setting and not on the inventory for Prime, Unique, or Important Farmland. Recently, a Park demonstration project planted corn on the site as part of a community interpretive event but not as commercial farmland. The use of the site as farmland prior to the railroad occupying the land will be part of the Park interpretation of the site's history.

PROPOSED MITIGATION

No mitigation required

3. AIR QUALITY.

ISSUES

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make the following determinations. Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan or regulation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutant concentrations (e.g., children, the elderly, individuals with compromised respiratory or immune systems)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|---|--|---|----------------------|
|---|--|---|----------------------|

COMMENTS:

The Park is in a non-attainment area for air quality so people attending activities at the Park during a poor air quality event could be exposed to poor air quality. It is not anticipated that the Park would be substantial generator of pollutants due to the small amount of parking at the site and the availability of users to access the Park from the Gold Line light rail.

PROPOSED MITIGATION

Mitigation will be explored during the development of the EIR, however, it is not anticipated that there will be substantial mitigation measures employed due to limited effectiveness of or ability of the lead agency to control potential mitigation measures for the site.

4. BIOLOGICAL RESOURCES.

ISSUES

Would the project:

| | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a sensitive, candidate, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on federally protected wetlands, as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

COMMENTS:

Except for limited natural landscape plantings, here are no biological resources on the site. However, the Master Development Plan would propose to add such resources to the site if a source of water can be reliably delivered.

| <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|---|--|---|----------------------|
|---|--|---|----------------------|

PROPOSED MITIGATION

No mitigation required but biological enhancements may be added to the project.

5. CULTURAL RESOURCES.

ISSUES

Would the project:

- | | | | | |
|--|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource, as defined in §15064.5? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to §15064.5? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

COMMENTS:

The site contains significant, intact historic archaeological artifacts, particularly building foundations associated with the first rail station in Los Angeles and other important remnants of the settling of Los Angeles. These features will be preserved and interpreted as part of the Park development.

PROPOSED MITIGATION

Phase II archaeological testing has been undertaken at the Park and significant features will be avoided during construction.

6. GEOLOGY AND SOILS.

ISSUES

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area, or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|---|---|--|---|-------------------------------------|
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable, as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems, where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

COMMENTS:

All work will proceed according to current design standards and protocols and include a geotechnical evaluation. Standard BMPs will be incorporated to address potential erosion during construction and as part of the project design. The site is located near the Raymond Fault, identified on the Alquist-Priolo Earthquake Fault Zoning Map and located in southern California, an area identified for frequent seismic events. The geotechnical evaluation will address this issue, and identify appropriate design measures to ensure safety standards are met. These issues will be further identified in the EIR. The project will connect to City of Los Angeles water and sewer systems.

PROPOSED MITIGATION

Construction will occur per the site recommended design standards and protocols.

7. HAZARDS AND HAZARDOUS MATERIALS.

ISSUES

Would the project:

| | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials, substances, or waste into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on a site which is included on a list of hazardous materials sites, compiled pursuant to Government Code §65962.5, and, as a result, create a significant hazard to the public or environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| | <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|--|---|--|---|-------------------------------------|
| e) Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport? If so, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Be located in the vicinity of a private airstrip? If so, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| h) Expose people or structures to a significant risk of loss, injury, or death from wildland fires, including areas where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

COMMENTS:

The site was remediated for hazardous waste prior to the acquisition of the property by the California Department of Parks and Recreation (CDPR). However, test wells indicated the presence of groundwater contamination. This issue will be addressed in greater detail in the EIR as studies are conducted and evaluated. The project would not create hazardous substances since the site is in Park use and the materials used for construction and construction methods will proceed with appropriate protocols and conditions to prevent the release of any potential hazardous substances. There are two schools within 1/4 mile of the project site, however, they are not directly adjacent to the site and separated by industrial uses. An adopted emergency response plan will be developed for the site by CDPR and include response plans for special events. The project site is in a urban location and not subject to wildland fires nor likely to produce landscaping that would place nearby land uses at risk of wildland fire.

PROPOSED MITIGATION

Possible mitigation or remediation required for groundwater contamination - possibly from offsite source. Will be addressed in EIR in detail.

8. HYDROLOGY AND WATER QUALITY.

ISSUES

Would the project:

| | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner which would result in substantial on- or off-site erosion or siltation? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|---|---|--|---|-------------------------------------|
| d) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in on- or off-site flooding? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map, or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h) Place structures that would impede or redirect flood flows within a 100-year flood hazard area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i) Expose people or structures to a significant risk of loss, injury, or death from flooding, including flooding resulting from the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Result in inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

COMMENTS:

The project site, although not part of the Los Angeles River channel, is located nearby and at a higher elevation. In order to utilize the river as a water source for the proposed wetland and riparian interpretive area on the project site, water would have to be piped onto the site from a location upstream. In concert with plans proceeding with the City of Los Angeles, a drainage system would also need to be constructed to remove water from the project site. All work would be coordinated with cooperating agencies for this portion of the project and in compliance with water quality standards.

PROPOSED MITIGATION

Mitigation, if required, would be identified during the preparation of the EIR as design details are developed.

9. LAND USE AND PLANNING.

ISSUES

Would the project:

| | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with the applicable land use plan, policy, or regulation of any agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

COMMENTS:

The Park is an existing site that will not divide existing communities but is anticipated to serve as a community focal point. The City of Los Angeles is actively planning land use changes adjacent and near the Park and CDPR is coordinating to ensure

| | | | |
|---|--|---|----------------------|
| <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|---|--|---|----------------------|

that these planning efforts are compatible. No habitat is located on the site but a demonstration project may include the creation of habitat for interpretation.

PROPOSED MITIGATION

No mitigation is required but CDPR will continue to coordinate planning efforts with the City of Los Angeles.

10. MINERAL RESOURCES.

ISSUES

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that is or would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

COMMENTS:

No mineral resources are located on the project site.

PROPOSED MITIGATION

No mitigation required.

11. NOISE.

ISSUES

Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Generate or expose people to noise levels in excess of standards established in a local general plan or noise ordinance, or in other applicable local, state, or federal standards? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Generate or expose people to excessive groundborne vibrations or groundborne noise levels? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Create a substantial permanent increase in ambient noise levels in the vicinity of the project (above levels without the project)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Create a substantial temporary or periodic increase in ambient noise levels in the vicinity of the project, in excess of noise levels existing without the project? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport? If so, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|--|---|--|---|----------------------|
|--|---|--|---|----------------------|

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) Be in the vicinity of a private airstrip? If so, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

COMMENTS:

Project events may require mitigation as they occur and CDPR will coordinate with the City of Los Angeles in order to minimize potential noise impacts to future residents. However, in the existing condition, there are few residences in a close enough proximity to the Park. Therefore, there would be little increase in ambient noise levels to existing adjacent, sensitive land uses. Park users would be subject to high noise levels during special events such as concerts but these would be temporary in nature. Ambient noise levels from park users would be increased as the Park is used by more visitors

PROPOSED MITIGATION

Mitigation measures for special events will be addressed in the EIR. No other mitigation is anticipated at this time.

12. POPULATION AND HOUSING

ISSUES

Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

COMMENTS:

The City of Los Angeles is concurrently undergoing planning efforts to introduce mixed commercial and residential uses in the project area. CDPR is coordinating with the City of Los Angeles on their planning efforts but it is not anticipated that existing housing would be relocated. New infill development may occur in close proximity to the Park because the Park Master Development Plan will make mixed use development more attractive in the immediate area.

PROPOSED MITIGATION

No mitigation is required but CDPR will coordinate closely with the City of Los Angeles to develop appropriate uses at the Park site.

| | <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|--|---|--|---|----------------------|
|--|---|--|---|----------------------|

13. PUBLIC SERVICES.

ISSUES

Would the project:

| | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Result in significant environmental impacts from construction associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Police protection? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| CDPR? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Other public facilities? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

COMMENTS:

The Park Master Development Plan will create a popular urban park utilized by many of the area's residents and attract regional users as well. It will become a community focal point and resource and require appropriate support to maintain its features and function. Additionally, special events will require additional public services for public safety and operational support.

PROPOSED MITIGATION

Specific mitigation strategies will be developed and discussed in the EIR

14. RECREATION.

ISSUES

Would the project:

| | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Increase the use of existing neighborhood and regional CDPR or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

COMMENTS:

CDPR will provide a new recreational opportunity to underserved urban communities as well as regional users. It is anticipated that operational public safety and maintenance support will be needed to adequately service the Park, especially as the visitor use increases with implementation of the Master Development Plan

PROPOSED MITIGATION

Specific mitigation strategies will be developed and discussed in the EIR

| | <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|--|---|--|---|----------------------|
|--|---|--|---|----------------------|

15. TRANSPORTATION/TRAFFIC

ISSUES

Would the project:

- | | | | | |
|--|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Cause a substantial increase in traffic, in relation to existing traffic and the capacity of the street system (i.e., a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Exceed, individually or cumulatively, the level of service standards established by the county congestion management agency for designated roads or highways? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Cause a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Contain a design feature (e.g., sharp curves or a dangerous intersection) or incompatible uses (e.g., farm equipment) that would substantially increase hazards? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Result in inadequate parking capacity? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

COMMENTS:

The project will attract greater numbers of park visitors to the site, particularly during special events. It is not anticipated that the site will contain adequate parking if these visitors were to all use motor vehicles to access the site. The Chinatown Station on the Gold Line light rail system is located immediately adjacent to the Park and it is anticipated that many visitors will access the Park without the need to drive motor vehicles. Additionally, joint planning is ongoing with the City of Los Angeles and other parties for additional parking areas offsite. A traffic study and further refinement of the traffic and parking issues will be addressed in the EIR.

PROPOSED MITIGATION

Specific mitigation strategies will be developed and discussed in the EIR

16. UTILITIES AND SERVICE SYSTEMS.

ISSUES

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Exceed wastewater treatment restrictions or standards of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

| | <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|---|---|--|---|--------------------------|
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Would the construction of these facilities cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Would the construction of these facilities cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in a determination, by the wastewater treatment provider that serves or may serve the project, that it has adequate capacity to service the project's anticipated demand, in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations as they relate to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

COMMENTS:

The project will have new water and sewer service needs that will be addressed in the EIR. Since the project is a park use, it is anticipated that many of these needs would be minor in nature.

PROPOSED MITIGATION

Specific mitigation strategies will be developed and discussed in the EIR

III. MANDATORY FINDINGS OF SIGNIFICANCE.

Would the project:

| | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Have the potential to eliminate important examples of the major periods of California history or prehistory? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects, and probably future projects?) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| | <u>POTENTIALLY SIGNIFICANT IMPACT</u> | <u>LESS THAN SIGNIFICANT WITH MITIGATION</u> | <u>LESS THAN SIGNIFICANT IMPACT</u> | <u>NO IMPACT</u> |
|---|---|--|---|--------------------------|
| d) Have environmental effects that will cause substantial adverse effects on humans, either directly or indirectly? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

COMMENTS:

Due to its nature as an urban park and the sensitivity of the cultural resources on the project site, planning efforts will need to incorporate many issues during the development of the Master Development Plan and EIR. It is anticipated that the cultural resources will be fully protected and interpreted as part of the project. The Park may play a substantial role as an urban feature in the City of Los Angeles and require continued coordination in both long-term and special event planning between CDPR and the City of Los Angeles.

IV. PRELIMINARY DETERMINATION

On the basis of the Initial Study,

- I find that the proposed project could not have an adverse effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect because the mitigation measures described in the attached Mitigation appendix will be required. A NEGATIVE DECLARATION will be prepared.
- I find the proposed project may have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

PREPARER: Tina Robinson

TITLE: Environmental Coordinator **DATE:** November 2008



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December 18, 2008

Tina Robinson, Environmental Coordinator
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Re: Notice of Preparation Los Angeles State Historic Park Master Development Plan

Dear Ms. Robinson:

The City Project submits these public comments regarding the Notice of Preparation Los Angeles State Historic Park Master Development Plan. The City project has submitted extensive public comments about this site over the past ten years and fully incorporates those comments here.

Briefly stated, we ask that the Department address the following concerns in the scope and content of the Park and any related planning documents including the environmental impact report and master development plan.

First, the Park must fully reflect the cultural and historical diversity of the site from Native American times to the present. Please see the attached Policy Report by Robert García, Erica S. Flores, and Julie Ehrlich, *The Cornfield and the Flow of History: People, Place, and Culture (April 2004)*, and the recommendations at page 21, and Robert García, Erica F. Baltodano, Christopher T. Hicks, *Public Art in the Public Park (2005)*, both of which are fully incorporated by reference here. The concerns that the Park fully and fairly reflect diversity, democracy, and freedom are especially acute because of the fact that over 900 official cultural and historical monuments in the City of Los Angeles, only 76 pertain to people of color, women, Native Americans, or workers. See www.cityprojectca.org/ourwork/publicart.html.

Second, the planning documents must address the health impacts of providing places and policies for physical activity and healthy eating in the Park – or not – on the children and people of Los Angeles. According to the County of Los Angeles, the prevalence of childhood obesity varies significantly among cities and communities, from a low of 4% in Manhattan Beach to a high of 37% in Maywood, and was found to be strongly associated with economic hardship. The County Health Department found a higher prevalence of obesity in cities or communities where the economic burden (higher poverty, lower educational attainment, more dependents, etc.) was greater compared to other cities and communities. Cities with less open area set aside as parks, recreational area, or wilderness area were more likely to have a higher prevalence of children who are obese. Source: Los Angeles County Department of Public Health, Office of Health Assessment and Epidemiology, *Preventing Childhood Obesity: the need to create healthy places. A Cities and Communities Health Report*. October 2007. See www.cityprojectca.org/blog/archives/480.

Healthy, Livable Communities For All

Board of Advisors: Chris Burrows Lydia Camarillo Virginia Keeny Robbie LaBelle Lyndon Parker
The City Project is a project of Community Partners

Los Angeles is park poor, and there are unfair disparities in access to park, school, and health resources. Children of color living in poverty with no access to a car have the worst access to parks, and to school fields with five acres or more of playing fields, and have the highest levels of child obesity. Active recreation at the Los Angeles State Historic Park can alleviate those disparities and promote health. See the attached Policy Report by Robert García, Erica Flores, Elizabeth Pine, *Dreams of Fields: Soccer, Community and Equal Justice* (December 2002), which is fully incorporated by reference here.

Third, we ask that the planning documents address the environmental justice and civil rights implications of the Plan and Park. See, e.g., *Dreams of Fields: Soccer, Community and Equal Justice* at 21-28.

We are eager to meet with you to work together to address these concerns.

Sincerely,

Robert García
Executive Director and Counsel

Zoë Rawson
Staff Attorney

Enclosures

The Cornfield and the Flow of History: People, Place, and Culture

A Report on the Park in the Cornfield to the
California Department of Parks and Recreation



The Great Wall of Los Angeles © Judith Baca.
Sponsored by Social and Public Art Resource Center (SPARC).

Robert García
Erica S. Flores
Julie Ehrlich

The City Project
Center for Law in the Public Interest

April 2004

**MISSION OF THE
CENTER FOR LAW IN THE PUBLIC INTEREST**

The Center for Law in the Public Interest is a nonprofit law firm that seeks justice for traditionally under-represented people and organizations and engages in litigation and other advocacy on a broad range of issues that have a significant impact on the public interest.

**MISSION OF THE CITY PROJECT
AT THE CENTER FOR LAW IN THE PUBLIC INTEREST**

The mission of The City Project at the Center for Law in the Public Interest is to achieve equal justice, democracy and livability for all by influencing the investment of public resources to achieve results that are equitable, enhance human health and the environment, and promote economic vitality for all communities. Focusing on parks and recreation, playgrounds, schools and transit, we help bring people together to define the kind of community where they want to live and raise children. The City Project works with diverse coalitions in strategic campaigns to shape public policy and law and to serve the needs of the community as defined by the community.

The Cornfield and the Flow of History: People, Place, and Culture

A Report on the Park in the Cornfield to the
California Department of Parks and Recreation

Robert García
Erica S. Flores
Julie Ehrlich¹

The City Project
Center for Law in the Public Interest

April 2004

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The value of the Cornfield lies in its potential to slice through time, connecting these larger historical and social patterns to the personal stories relevant to the contemporary experience of Angelenos. It will serve as the touchstone through which all of us come to see how we fit into the greater Los Angeles story.

The Cornfield State Park
Advisory Committee
Recommendations Report, p. 9

I. Executive Summary

One of the broadest and most diverse alliances ever formed behind any issue in Los Angeles stopped warehouses to create a state park in the 32-acre Cornfield, a site of remarkable social, historical, and cultural significance to all Angelenos and the last vast open space in downtown Los Angeles. The *Los Angeles Times* called the Cornfield a “heroic monument” and a “symbol of hope.”²

The Cornfield State Park Advisory Committee presented a vision for the Cornfield based on the essential themes of culture and history, connectivity, recreation, and transportation, stating that “a park at the Cornfield should be connected to the struggles, the histories, and the cultures of the rich and diverse communities that have surrounded it since the site was settled.” The Center for Law in the Public Interest (the Center) presents this report on the people of the Cornfield to the California Department of Park and Recreation to guide the general plan process. This Report addresses these themes, with a particular emphasis on the forgotten history of Los Angeles. From the time of the Tongvas, who built the village of Yangna near the Cornfield, the Cornfield and its surroundings have been a place imbued with the diverse history of Los Angeles.

Part II of this Report presents the vision for the Cornfield, as articulated by the Advisory Committee. Part III places the Cornfield in a geographic and historical context, and describes the demographics of the community surrounding the Cornfield today. Part IV addresses the struggle for parks in Los Angeles, linking the Cornfield to Chavez Ravine. The people struggled to create a sense of community and to fulfill their dreams in both situations, but triumphed only in the Cornfield. Part V of this Report describes the struggles, hopes, and triumphs of the people of the Cornfield and El Pueblo.

In Part VI, we address the theme of connectivity. Support is growing to create the Heritage Parkscape in the heart of Los Angeles. The Heritage Parkscape would link the Cornfield to El Pueblo, the Los Angeles River, Taylor Yard, and over 100 additional historical, cultural, recreational, and environmental resources that have been identified by the Advisory Committee. In Part VII, we make our recommendations for the Cornfield general plan before concluding our Report in Part VIII.

II. The Vision for the Cornfield



The Cornfield is “a heroic monument” and “a symbol of hope,” according to the *Los Angeles Times*.³

The Cornfield State Park Advisory Committee recognized in its Recommendations Report to the California Department of Parks and Recreation that urban parks play a unique role in fostering community.⁴ Since their inception, urban parks have celebrated history, provided venues for cultural events, supported wildlife habitat, and provided opportunities for active recreation. The park at the Cornfield should enhance the natural environment, celebrate the social, historical, and cultural environment, and enrich the lives of those who visit and reside or work nearby.⁵

The Advisory Committee’s vision for the Cornfield is based on the essential themes of culture and history, connectivity, recreation, and transportation. With these themes in mind, the Committee believes that “a park at the Cornfield should be connected to the struggles, the histories, and the cultures of the rich and diverse communities that have surrounded it since the site was settled.”⁶

The development of the Cornfield into a world-class park will be a “critical building block in an urban renaissance of the historic heart of the city,”⁷ the Advisory Committee notes. The Cornfield not only represents the “beginning in the rebirth of downtown Los Angeles,” it also serves as a “recognition of the richness of our past and the enormous possibilities of our collective future.”⁸

The Cornfield is part of a collective vision for a comprehensive and coherent web of parks, playgrounds, schools, beaches, forests and open space, and transportation that serves the diverse needs of diverse users and reflects the cultural urban landscape, as discussed below.⁹

III. The Cornfield

The Cornfield lies just south of the confluence of the 51-mile Los Angeles River and the 22-mile Arroyo Seco, in one of Los Angeles’s most culturally, historically, and ethnically diverse– and park-poor– communities.

The Cornfield, an abandoned rail yard for over 12 years, is located near downtown between Chinatown on the west and the River on the east, within walking distance of City Hall, and just down the hill from Dodger Stadium. A few blocks south is El Pueblo de Los Angeles, the Spanish birthplace of the City, lined with historic buildings. The Native American village of Yanga lay nearby. The William Mead Homes, one of the first public housing projects in Los Angeles, is located directly east of the Cornfield. Little Tokyo lies further south.

Remnants of the historic Zanja Madre, the “Mother Trench,” the lifeline that first brought water from the Los Angeles River to El Pueblo in 1781, run through the Cornfield.



Remnants of the Zanja Madre or “Mother Trench” that first brought water from the Los Angeles River to El Pueblo de Los Angeles in 1781 have been found at the Cornfield.¹⁰

Los Angeles became the most important city in Southern California in large part because of its water supply. The Zanja Madre provided water from the River to El Pueblo for residential, agricultural, and industrial use from 1781 until 1904. The Zanja system permitted early Los Angeles to develop an agricultural economy and vineyards, citrus groves, vegetable gardens, and later fields of flowers.¹¹



Original water wheel at the Cornfield site in 1852.¹²

The Juan Bautista de Anza National Historic Trail, which marks the trail that Spaniards and Catholic missionaries used to reach northern California, runs near the Cornfield. The Cornfield communities are crisscrossed by old Native American trails, railroads, trolley lines, and freeways. The nearby Native American Tongva or Gabrieleño village of Yangna was located near the confluence of several Native American trails.¹³

The people of the Cornfield today are disproportionately people of color who live in poverty, have no access to a car, have limited education, and lack access to parks and open space. Chinatown until now has had no park, and still has no middle school or high school with playgrounds, playing fields, or green space. The only elementary school there does not have a single blade of grass. The only playground in the William Mead Homes was long closed because of environmental contamination.

The community within a five mile radius of the Cornfield is 68% Latino, 14% Asian, 11% non-Hispanic white, and 4% African-American.¹⁴ Thirty percent of the population lives in poverty, compared to 14% for the State of California as a whole, and 18% for Los Angeles County. The median household income is \$28,908 – just 60% of the \$47,493 median household income for the State.

Today four freeways eviscerate the Cornfield communities, but fully 29% of households have no access to a car – an astonishing figure in Los Angeles, the car capital of the world. Only 9% of households in California and 13% of households in Los Angeles County are without cars. With the recent opening of the MTA Gold Line light rail and connecting bus service, the Cornfield is more accessible to surrounding communities and visitors.

Fewer than half of the people of the Cornfield over age 25 (49%) have completed high school, and just 15% have a bachelor's degree. In contrast, 77% of Californians and 70% of County residents over age 25 have high-school diplomas; 27% of Californians and 25% of County residents have bachelor's degrees.

There are 993,047 people including 282,967 children (28%) within five miles of the Cornfield.¹⁵

Many public leaders see the revitalization of the Los Angeles River corridor as a key to the economic and environmental enhancement of Los Angeles, and a thread that could provide Los Angeles with a greater sense of community. Central to the River's revitalization is the Cornfield, a site from which the history of Los Angeles flows.

IV. The Struggle for Parks: the Cornfield and Chavez Ravine

“On a deserted railroad yard north of Chinatown, one of Los Angeles's most powerful and tenacious real estate developers, Ed Roski, Jr., of Majestic Realty Co., met his match,” according to a front page article in the *Los Angeles Times*.¹⁶ Members of the Chinatown Yard Alliance stopped federal subsidies for an \$80 million warehouse project planned by Majestic and the City of Los Angeles without full environmental review, and secured state funding to create the park in the Cornfield.

The Alliance brought together an unprecedented group of over 35 community, civil rights, traditional environmental, environmental justice, religious, business, and civic organizations and leaders. The Alliance secured the support of the community, a Cardinal of the Catholic Church, Guatemalan Nobel Peace Laureate Rigoberta Menchú, a Cabinet member in the Clinton administration, Governor Gray Davis, and the state legislative leadership to make the dream of a park come true.

In addition to creating playing fields and open space in a neighborhood that have none, a park in the Cornfield will help improve the quality of life, create quality jobs, increase tourism, increase property values, promote economic revitalization of the community and preserve invaluable cultural and historic resources at the birthplace of Los Angeles.

The Cornfield and its environs exemplify the struggle by low-income people of color in Los Angeles for livable communities with parks, playgrounds, schools, and recreation. Chavez Ravine, just up the hill from the Cornfield, was a bucolic Latino community through the 1950s. The 1930 Report by the Olmsted Brothers & Bartholomew and Associates, *Parks, Playgrounds and Beaches for the Los Angeles Region*, stressed that the Cornfield vicinity was ideal for regional athletic fields: “The bottom of Chavez Ravine near the easterly end is easily accessible from the city and would make an ideal place for athletic fields of large size to serve large crowds.”¹⁷ The Report recommended that the City of Los Angeles acquire the area so that it could be “devoted to recreation and made a part of the park.”¹⁸



Chavez Ravine, circa 1950s.¹⁹

The City instead forcibly evicted the residents of Chavez Ravine with promises to build affordable housing there. The City razed the community and destroyed their way of life, then broke its promises to the people and sold the land to the Dodgers baseball franchise. The Dodgers drowned Chavez Ravine in a sea of asphalt to build Dodger Stadium and a parking lot for 50,000 cars with not a single place for children to play.²⁰



Los Angeles County sheriffs forcibly evict Mrs. Aurora Vargas, 36, from her home at 1771 Malvina Avenue in Chavez Ravine on May 9, 1959.²¹



Chavez Ravine today.²²

Los Desterrados – those who lost their land, their homes, and their community – still reunite once a year to commemorate the destruction of Chavez Ravine at the hands of City officials. Fittingly, Carol Jaques, one of Las Desterradas, is now a Commissioner for El Pueblo de Los Angeles Historic Monument.



DIVISION OF THE BARRIOS & CHAVEZ RAVINE

The Great Wall of Los Angeles © Judith Baca.

Sponsored by Social and Public Art Resource Center (SPARC).²³

V. The People of the Cornfield

A. The Tongvas and the Village of Yangna



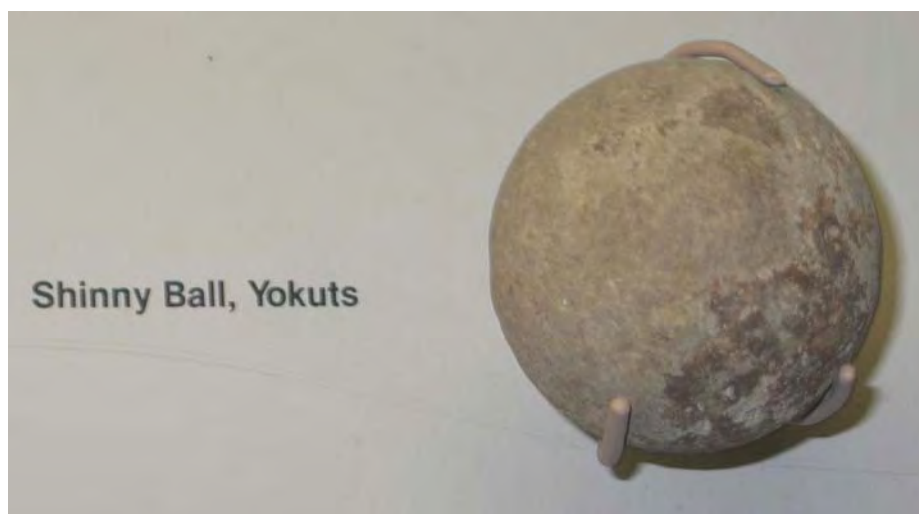
The Great Wall of Los Angeles © Judith Baca.

Sponsored by Social and Public Art Resource Center (SPARC).

The Tongva or Gabrieleño Native Americans who lived on and near the Cornfield for approximately three millennia were for the most part exterminated by succeeding onslaughts of Spaniards, Catholic missionaries, Mexicans, and Yankees beginning in the late 1700s. About

200 Tongvas lived in the village of Yangna, the largest of some 100 villages that were home to about 5,000 Native Americans in the Los Angeles region, when the Spaniards arrived in 1769. Eventually, the Tongvas were relocated to the east side of the River. In the mid-1800s, Yangna was destroyed. Today the village of Yangna is commemorated by nothing more than a center divider on the Hollywood freeway.²⁴

According to Chief Anthony Morales and tribe member Mark Acuna, Tongva families played “shinny,” a game similar to soccer, and enjoyed other field sports along the Los Angeles River.



Shinny ball on display at the Southwest Museum of the American Indian in Los Angeles.²⁵

“California’s native games and toys are a reflection of the natural history of the state—its mountains, rivers, deserts, wetlands, woodlands, and seashore—and California’s first people.”²⁶ Native Californians had a “passion for football-type games.”²⁷ They “drove, tossed, or batted balls of mountain mahogany, braided buckskin, or polished stone, stuffed deerhide or seasoned laurel knots.”²⁸ In most shinny- and soccer-like games, teams tried to score by getting the ball past the other team and through goal posts, or through a hole.²⁹ Soccer-like games involving balls and goal posts were river games—games played along river beds throughout California.³⁰

Chief Morales supports active recreation for children in the Cornfield today, and has urged officials to “work together to ensure that the children of the Cornfields and [nearby] Taylor Yard are not displaced the way the Tongva people once were.”³¹

B. Latino Los Angeles

To the south of the Cornfield is El Pueblo de Los Angeles Historic Monument, which includes the Plaza built between 1818 and 1824; La Placita, the first Catholic Church in Los Angeles; the tourist attraction Olvera Street; and a total of 27 historic buildings.³²



The Great Wall of Los Angeles © Judith Baca.

Sponsored by Social and Public Art Resource Center (SPARC).

The original Pueblo de Nuestra Señora la Reina de Los Angeles was founded by a diverse group of settlers, Los Pobladores, along the Los Angeles River in 1781. Los Pobladores included 44 Spanish, Native American, Black, mestizo and mulatto settlers, and four Spanish soldiers. The original Pueblo covered about 28 square miles and included the area east across the River now known as Boyle Heights and Lincoln Heights.³³ Mexico, including California, became independent of Spain in 1821.

For over 40 years after statehood in 1850, El Pueblo entered a period of vigilante justice and repeated assaults, murders, and lynchings against lower class Mexicans. Vigilante groups called the Los Angeles Rangers and the El Monte Rangers lynched 15 Mexicans in 1857, for example.³⁴

Through the 1930s, Mexicans disproportionately lived in the area now occupied by Chinatown and then known as Sonoratown because so many people from Sonora, Mexico, lived there.³⁵

During the Great Depression in the 1930s, 350,000 Mexican Americans including United States citizens were deported to Mexico from the train station in the Cornfield because of discrimination and competition for jobs.³⁶



Deportation of Mexican-Americans, *The Great Wall of Los Angeles* © Judith Baca.
Sponsored by Social and Public Art Resource Center (SPARC).

The Zoot Suit riots broke out during World War II when Anglo sailors and soldiers stationed in Chavez Ravine drove to East L.A. and beat up Mexican Americans and Blacks just a few blocks northeast of the Cornfield across the North Main Street Bridge over the Los Angeles River.³⁷ Rumors based on unfounded press accounts insinuated that Mexican American youths who dressed in “zoot suits” were avoiding military service and attacking white women. White sailors brutalized their victims and left them lying in the streets, while police officers and sheriffs arrested Mexican American men instead of the attackers.³⁸



Zoot Suit Riots, *The Great Wall of Los Angeles* © Judith Baca.
Sponsored by Social and Public Art Resource Center (SPARC).

C. Old and New Chinatown

The Chinese first arrived in California driven by dreams of opportunity beginning with the 1849 Gold Rush. Barred from the most lucrative gold mining work, they turned to the railroads and domestic work for a livelihood.³⁹



The Great Wall of Los Angeles © Judith Baca.
Sponsored by Social and Public Art Resource Center (SPARC).

The Chinese were discriminated against, denied a decent livelihood, dehumanized, and lynched. They were not allowed to go to public schools. They were denied citizenship and the rights to vote and to own property. They could not testify in court. The Chinese Exclusion Act of 1882 banned immigration by Chinese laborers into the United States for the next 60 years, and barred immigrants already here from becoming naturalized citizens or having their spouses join them.

By the end of the nineteenth century, the Chinese had been systematically squeezed into a small area southeast of the Cornfield on the south side of the Plaza towards the Los Angeles River through discriminatory enforcement of health regulations, arson, violence, and the destruction of buildings as a result of racial discrimination and fears that Chinese would lower property values. Until after World War II, most Chinese could not rent an apartment or buy a home in most parts of Los Angeles.

In 1871, a mob that included police officers committed the lynching murders of nineteen Chinese residents.⁴⁰ The Chinatown Massacre first brought Los Angeles to national and international attention. The Massacre started on Calle de los Negros—called “Nigger Alley” at the time—within walking distance of the Cornfield and the present Union Station, across the street from the recently opened Chinese National Museum.

In the 1920s and 1930s, the railroads—Union Pacific, Southern Pacific, and the Atchison, Topeka & Santa Fe—planned to construct a terminal downtown. Old Chinatown was destroyed and residents were relocated to the present site of new Chinatown to make room for Union Station. The City Municipal Housing Commission did not even approve a plan to relocate Chinatown until weeks after the demolition started. New Chinatown was built on its present location on vacant Southern Pacific railroad land west of the Cornfield in the area of old Sonoratown. Today Union Station is listed in the National Register of Historic Places for its architectural, historical, and archeological values. An interpretive panel on a walking tour outside Union Station makes no mention of the destruction of Old Chinatown.



Old Chinatown on the east side of Los Angeles Street, north from Aliso.⁴¹

D. Little Tokyo

The first Japanese emigrant party to the mainland United States reached California in 1869. Japanese migration increased significantly in the 1880s, in part because of the demand for labor caused by the Chinese Exclusion Act of 1882.⁴² Since the 1910s, Los Angeles has been the home of more Japanese Americans than any other city in the United States. Little Tokyo, located just south of Old Chinatown, became the residential, business, and cultural center of the Japanese American community in Southern California.⁴³



Most of Los Angeles was off-limits to Japanese Americans and other people of color for much of the twentieth century.⁴⁴

Japanese Americans were forced to leave Little Tokyo by Executive Order 9066 and their mass relocation to concentration camps during World War II. The United States Supreme Court upheld the relocation in *Korematsu v. United States*.⁴⁵ As the Japanese Americans left Little

Tokyo, African Americans lured from the South by the promise of defense jobs moved to the area that then became known as Bronzeville.⁴⁶



Asian-Americans attained naturalization and the right to own land in the 1950s.⁴⁷ Here, a Korean man becomes a U.S. citizen and a Japanese farmer stands proud in his newly purchased field. *The Great Wall of Los Angeles* © Judith Baca.

Sponsored by Social and Public Art Resource Center (SPARC).

After 1945 the Japanese returned and Little Tokyo began to rebuild, but on a much smaller scale. Today a public walking tour combined with public art interprets the social, political, and commercial history embodied there. A terrazzo and concrete sidewalk with bronze lettering carries quotations from residents, timelines for the historic buildings, drawings, and other historical artifacts.⁴⁸ The Little Tokyo Historic District offers important lessons for developing the Cornfield as a historic park and as part of the Heritage Parkscape, as discussed below.

E. African American Los Angeles

The original settlers of El Pueblo, Los Pobladores, included Blacks and mulattos. A Black man, Francisco Reyes, served as alcalde (mayor) of El Pueblo in 1793, almost two hundred years before Tom Bradley, the first Black man elected mayor under statehood.⁴⁹ The last Mexican governor of California before statehood, Pío Pico, was born of African, Native American, and European ancestry under a Spanish flag.⁵⁰

Biddy Mason, one of the most prominent citizens of early Los Angeles, was born a slave in Mississippi. She walked behind her owner's wagon first to Utah and then to Los Angeles. She gained her freedom in Los Angeles through a federal court order in 1856, just before the United States Supreme Court held in the *Dred Scott* case that slaves were chattel entitled to no constitutional protections because Blacks had "no rights which the white man was bound to respect."⁵¹ With savings earned as a midwife, Biddy Mason bought a homestead a few blocks south of the Plaza on Spring Street between Third and Fourth. She helped found the First African Methodist Episcopal Church, one of the most influential and affluent African American

churches in the City today. The Biddy Mason wall and pocket park in the heart of downtown Los Angeles commemorate her contributions to the City.⁵²

Despite the prominent role of Blacks in early Los Angeles, Black residential and business patterns began to change in response to discriminatory housing and land use patterns in the twentieth century. Los Angeles pioneered the use of racially restrictive housing covenants. The California Supreme Court sanctioned restrictive covenants in 1919 and California courts continued to reaffirm them as late as 1947.⁵³ The Federal Housing Authority not only sanctioned restrictions, but developed a recommended formula for their inclusion in subdivision contracts.⁵⁴ Blacks increasingly were pushed out of the Plaza area and became concentrated a few miles away in South Central Los Angeles.



Billie Holliday and the Dunbar Hotel in South Central Los Angeles, where Black musicians stayed and Black residents heard jazz.

The Great Wall of Los Angeles © Judith Baca.

Sponsored by Social and Public Art Resource Center (SPARC).

Restrictive city ordinances, housing covenants, and other racially discriminatory measures dramatically limited access by Black people to housing, jobs, schools, playgrounds, parks, beaches, restaurants, transportation, and other public accommodations. As a result, 95% of the city's housing stock was off limits to Blacks and Asians in the 1920s.



“Blacks Prohibited” sign at Santa Monica Beach, circa 1920s-1930s.⁵⁵

In the 1960s, as social and legal segregation began to fall, middle and upper class blacks disproportionately moved westward. White flight from advancing Blacks opened up opportunities to rent or buy housing. Urban renewal programs targeted ethnic areas and wiped out most nineteenth century buildings and neighborhoods.⁵⁶ By the 1990s, the Baldwin Hills area including the Crenshaw District and Leimert Park had become the geographical focus of Black Los Angeles.⁵⁷



Paul Robeson, Rosa Parks, and birth of the Civil Rights Movement.
The Great Wall of Los Angeles © Judith Baca.
 Sponsored by Social and Public Art Resource Center (SPARC).

F. Solano Canyon

Solano Canyon, surrounded by the hills of Elysian Park near the Cornfield, has housed Irish, Italian, French, Chinese, and Latino immigrants for many generations. Captain Gaspar de Portolá and his men camped at what is now the intersection of Solano and North Broadway at the entrance to Elysian Park during their 1769 expedition. In the 1840s, many immigrants who arrived in Los Angeles and found no place to live sought shelter by camping in the Solano Canyon. Later, many of these families stayed and built their homes in the area, taking advantage of the fertile soil, planting vegetables and orchards. Some of these trees still bloom today.⁵⁸ Italians and French immigrants who played an important part in the development of early Los Angeles later assimilated into the broader culture.



View of the Los Angeles River from Elysian Park, 1898.⁵⁹

Today Solano Canyon residents represent a range of socioeconomic and ethnic groups. Though Solano Canyon is divided by the Pasadena Freeway, the community remains unified. Houses built 100 years ago stand among new, modern apartments with vistas of the Elysian Hills.

G. A Place for Women

Women have played central roles in the development of Los Angeles on and off the Cornfield. Half of the original Pobladores were women. Biddy Mason is one of the most prominent women in the history of the City. Aurora Vargas struggled mightily to save Chavez Ravine. Mural artist Judith F. Baca has commemorated the history of Los Angeles from the perspective of people of color at the Great Wall of Los Angeles, which depicts many of the events that took place in El Pueblo near the Cornfield and along the Los Angeles River. The Women's Building, which overlooks the Cornfield on Spring Street, was the center of feminist artistic activity and consciousness raising in Los Angeles from 1975 to 1981.



The Women's Building near the Cornfield on Spring Street.⁶⁰

H. Recreation at the Cornfield

The Cornfield Advisory Committee called for space for recreation in the Cornfield.⁶¹ The Center has addressed the need for active recreation in the Cornfield in its report *Dreams of Fields: Soccer, Community, and Equal Justice*, submitted to the California Department of Parks and Recreation in December 2002. State Parks and Recreation Director Ruth Coleman has agreed that “[t]he Cornfield will have open space for multiple uses, which can include soccer, which is what happens at Will Rogers, for example.”⁶²



State Parks provides playing fields for soccer at Will Rogers State Historic Park.⁶³

I. Honoring the Community

A plaque at Crissy Field in San Francisco honors the community that made possible the transformation of the site from an airfield to a 100-acre park. A similar plaque at the Cornfield should honor the community that stopped the warehouses in order to fulfill the dream of creating a park. The plaque at the Cornfield could say:

**Dedicated to Those Who Made the Dream of
Creating a Park on the Cornfield a Reality**

**This Park is a Testament to the Struggles, Hopes, and Triumphs
of the Generations Who Have Entered Los Angeles Through the Cornfield and El Pueblo.**



Plaque at Crissy Field in San Francisco recognizes the role of the community in creating the park.⁶⁴

VI. Honoring the Struggles, Hopes, and Triumphs of the People of the Cornfield

The rich history of the Cornfield and surrounding communities along the Los Angeles River can connect the people of Los Angeles through space and time. “The location of the site at the city’s heart . . . presents a unique opportunity in Los Angeles to forge a connection of people, history, and place by opening a window to understanding the past and tracing the present into the future,” according to the Cornfield Advisory Committee.⁶⁵

A. Linking the Cornfield and El Pueblo

The historical and cultural value of the Cornfield lies largely in the fact that it was part of the original Pueblo de Los Angeles along the Los Angeles River, and in its close proximity to El Pueblo Historical Monument today. Linking the Cornfield to El Pueblo Historical Monument will fulfill in part the connectivity element of the vision for the Cornfield articulated by the Cornfield Advisory Committee. The Cornfield can provide open space for social gatherings, cultural events, public art, and recreation, while El Pueblo can provide museum and gallery space in its historic, but largely neglected, buildings. The Cornfield and El Pueblo Historical Monument can be linked to each other through interpretive panels, public art, and greenways, and more broadly to the Heritage Parkscape.



Conceptual design by architect Arthur Golding linking the Cornfield to El Pueblo Historical Monument with tree-lined walkways.

The General Plan for El Pueblo de Los Angeles State Historic Park offers a blueprint for a historic park linking El Pueblo and its historic buildings with the open space in the Cornfield. Originally adopted in 1980, the General Plan described in detail a joint project by the California Department of Parks and Recreation, the City of Los Angeles, and the County of Los Angeles. The State withdrew from the project in 1990, leaving the promise of El Pueblo Historic Park largely unfulfilled. Linking the Cornfield with El Pueblo presents an opportunity to fulfill that promise today. The Center has reissued the General Plan in a digital version that is available on the Center's website at www.clipi.org in an effort to guide policy makers and advocates in making El Pueblo and the Cornfield a world class historic park.

The California Department of Parks and Recreation has also published a study based on the public's need to become more aware of California's cultural diversity and its tangible manifestations on the land. *Five Views: An Ethnic Sites Survey for California (1982)* can serve as a guide for planning the Cornfield, El Pueblo, and the Heritage Parkscape.⁶⁶

B. The Heritage Parkscape

The Advisory Committee recommended developing linkages from the Cornfield to over 100 additional historical, cultural, recreational, and environmental resources in the heart of Los Angeles.⁶⁷

Support in Los Angeles is growing to create the Heritage Parkscape—like the Freedom Trail in Boston or the Little Tokyo historic district—that will forge these links beginning with the Cornfield, El Pueblo, the Los Angeles River, and Taylor Yard.⁶⁸ The Heritage Parkscape will help bring the City together and heal wounds of the past.⁶⁹ The Heritage Parkscape addresses the call for connectivity articulated by the Cornfield Advisory Committee in its Recommendations Report to State Parks.

Public art projects, including murals of scenes like those depicted in the Great Wall of Los Angeles, will revive the forgotten history of Los Angeles. Interpretive panels and displays, photography exhibitions, school art projects, oral histories, and theater will be part of this living legacy. Public transit will take children and their families and friends from the Heritage Parkscape to the beaches, forests, mountains, and other wilderness and recreation areas.⁷⁰

The Heritage Parkscape will serve as a “family album” to commemorate the struggles, hopes and triumphs of the natives, settlers, and later immigrants who entered Los Angeles through this area, the Ellis Island of the region.

The Heritage Parkscape, like the Cornfield, illustrates the power of place: “the power of ordinary urban landscapes to nurture citizens' public memory, to encompass shared time in the form of shared territory And even bitter experiences and fights communities have lost need to be remembered – so as not to diminish their importance.”⁷¹

The footprint of the Heritage Parkscape coincides closely with the Olmsted vision of parks and greenspace for downtown and along the Los Angeles River. The Chinatown Cornfield is a key part of this vision. It is a space that must commemorate the flow of history and preserve one of last vast open spaces in the heart of Los Angeles as a world-class park.⁷² *See inside back cover.*

VII. Recommendations

The Center for Law in the Public Interest presents the following recommendations.

1. The state should adopt Alternative A, the “Minimal Build-Out” conceptual design for the Cornfield, because it maximizes open space for a balanced park that celebrates the struggles, hopes, and triumphs of the generations of people who have entered the region through the Cornfield and El Pueblo.
2. Open space at the Cornfield should be maximized to accommodate social gatherings, cultural events, and recreation. The Cornfield should include large open areas for soccer and other sports, integrated harmoniously with the natural setting and the cultural and historical values at stake, as recommended by the Cornfield Advisory Committee. Museums and other buildings should not be constructed on the site and open space should be made available for active recreation.
3. The Cornfield should include public art projects including murals with scenes like those depicted in the Great Wall of Los Angeles to revive the forgotten history of Los Angeles, and the struggles, hopes, and triumphs of the people along the Los Angeles River.
4. The Cornfield should include interpretive panels and displays to tell the story of the Cornfield, El Pueblo, the Los Angeles River, the people, and of how the community triumphed to create the park in the Cornfield.
5. The Cornfield should be connected to El Pueblo through a greenway with trees, art, and interpretive panels. The 1980 General Plan for El Pueblo provides a good blueprint for linking the Cornfield to El Pueblo.
6. The Cornfield, El Pueblo, Taylor Yard, and the Los Angeles River should be linked through the Heritage Parkscape with over 100 additional cultural, historical, recreational, and environmental resources to serve as a family album for the people of Los Angeles.

VIII. Conclusion

Los Angeles is park poor, with fewer acres of parks per resident than any major city in the country. All communities suffer from the lack of parks and recreation, but low-income people of color suffer first and worst. There are unfair disparities in access to parks, playgrounds, beaches, and recreation based on race, ethnicity, and class. Inspired by a collective vision for a comprehensive and coherent web of parks, playgrounds, schools, beaches, and transportation that serves the diverse needs of diverse users and reflects the cultural urban landscape, the urban park movement is addressing park and recreation inequities and greening Los Angeles. This is part of a broader vision for distributing the benefits and burdens of public resources in ways that are equitable, protect human health and the environment, promote economic vitality, and engage full and fair public participation in the decision making process.

Parks like the Cornfield and open space in school yards, beaches, and wilderness areas like national forests are important in themselves, but there is even more at stake. Parks bring people together to create the kind of community where they want to live and raise children.

The struggle for and triumph of the Cornfield demonstrates how the urban park movement is building community and diversifying democracy from the ground up and giving people a sense of their own power in deciding the future of their city, their lives, and their children's lives. People who have not participated in government before are fighting city hall and wealthy developers— and winning. The urban park movement is making Los Angeles a greener, more just, and more sustainable community for all. The Cornfield is just the beginning.

¹ Robert García is Executive Director, Erica S. Flores is Assistant Director, and Julie Ehrlich is a Policy Analyst at the Center for Law in the Public Interest. This Report is made possible in part by the generous support of the Ford, Surdna, Packard, and Resources Legacy Fund Foundations.

² Jesus Sanchez, “L.A.’s Cornfield Row: How Activists Prevailed,” *L.A. Times*, April 17, 2001, A1.

³ Photo by Robbie LaBelle (2000).

⁴ Cornfield State Park Advisory Committee Recommendations Report 5 (2003).

⁵ *Id.*

⁶ *Id.* at 6.

⁷ *Id.* at 7.

⁸ *Id.*

⁹ See Robert García, *et al.*, “Community, Democracy and the Urban Park Movement,” chapter in the second edition of Robert Bullard’s book on Environmental Justice to be published by the Sierra Club 8-17 (forthcoming 2004) [hereinafter *Community, Democracy and the Urban Park Movement*]. See also Robert García, *et al.*, “Equal Access to California’s Beaches” (Center for Law in the Public Interest, 2003); Robert García, *Equal Access to California’s Beaches*, Proceedings of the Second National People of Color Environmental Leadership Summit (Summit II) (2002), www.ejrc.cau.edu/summit2/Beach.pdf; Robert García, *et al.*, “Healthy Children, Healthy Communities: Schools, Parks, Recreation, and Sustainable Regional Planning,” chapter in the Urban Equity symposium edition of the *FORDHAM URBAN LAW JOURNAL* (forthcoming 2004); Robert García and Tom Rubin, “Cross Road Blues: Transportation Justice and the MTA Consent Decree,” chapter in book by Karen Lucas, ed., *RUNNING ON EMPTY*, to be published by University of Westminster (forthcoming 2004). See generally Olmsted Brothers & Bartholomew and Associates, *Parks, Playgrounds, and Beaches for the Los Angeles Region*; Greg Hise & William Deverell, *EDEN BY DESIGN* (2000).

¹⁰ Photo by Robert García (2004).

¹¹ Blake Gumprecht, *THE LOS ANGELES RIVER: ITS LIFE, DEATH, AND POSSIBLE REBIRTH* 44-63 (2001); Dolores Hayden, *THE POWER OF PLACE: URBAN LANDSCAPES AS PUBLIC HISTORY* 210-25 (1997).

¹² Image courtesy of the Los Angeles Public Library.

¹³ These transportation elements fulfill the transportation theme identified by the Cornfield Advisory Committee. These elements can be articulated through interpretive panels and public art such as murals. Under no circumstances should the Cornfield be destroyed to create a transportation museum dedicated to the railroads with build-out eliminating much or all of the open space at the site, as some advocates maintain. These advocates played no role in stopping the warehouses or securing the funding for a park at the Cornfield. The community did not stop the warehouses in order to build 32 acres of museum space. Any museum or gallery space can be located in the historic buildings of El Pueblo Historic Park or in the Capitol Mills building, leaving maximum open space in the Cornfield. There are already other railroad museums in the state, and any other railroad museum can be placed in Union Station. There is no reason to privilege the history of the railroads, corporate history, and the history of the dominant class over the history of the people of the Cornfield.

¹⁴ The population of California is 32% Latino, 10% Asian, 47% non-Hispanic white, and 6% African-American. The population of Los Angeles County is 45% Latino, 12% Asian, 31% non-Hispanic white, and 10% African-American. (*Source*: 2000 census data).

¹⁵ *Id.*

¹⁶ Jesus Sanchez, “L.A.’s Cornfield Row: How Activists Prevailed,” *supra*. For a detailed account of the successful struggle for the Cornfield, see *Community, Democracy, and the Urban Park Movement*.

¹⁷ Olmsted Brothers & Bartholomew and Associates, *Parks, Playgrounds, and Beaches for the Los Angeles Region* 128-29 (1930). See also Greg Hise & William Deverell, *EDEN BY DESIGN* (2000).

¹⁸ *Id.*

¹⁹ Image courtesy of the Los Angeles Public Library.

²⁰ See *Culture Clash, Chavez Ravine* (2003), complete text published in *AMERICAN THEATER* (Nov. 2003); Don Normark, *CHAVEZ RAVINE, 1949: A LOS ANGELES STORY* at 18-21 (1999).

²¹ Image courtesy of the Herald-Examiner Collection at the Los Angeles Public Library.

²² Image courtesy of the Ralph Morris Collection at the Los Angeles Public Library.

²³ Photos of *The Great Wall of Los Angeles* on the front cover and on pages 8, 10, 11, 12, 14, 15, and 16 were taken by Robert García (2004). The Great Wall of Los Angeles in the Tujunga Wash of the Los Angeles River is the longest mural in the world. It depicts the history of Los Angeles from prehistoric times through the 1960s. The

Center and SPARC are working to link The Great Wall to the Heritage Parkscape in the heart of Los Angeles, restore and extend the mural to include recent events, such as stopping the warehouses to create a park in the Cornfield, and build a park at the Great Wall site.

²⁴ See generally Nancy Bonvillain, NATIVE NATIONS: CULTURES AND HISTORIES OF NATIVE NORTH AMERICANS 393 (2001); Cecilia Rasmussen, "L.A. Then and Now: A Sycamore Deeply Rooted in the City's Past," *L.A. Times*, Sept. 2, 2002.

²⁵ Photo by Julie Ehrlich (2004).

²⁶ Jeannine Gander, GRASS GAMES & MOON RACES: CALIFORNIA INDIAN GAMES AND TOYS 15 (1995).

²⁷ *Id.* at 17.

²⁸ *Id.*

²⁹ *Id.* at 23.

³⁰ See *id.* at 20, 23, 25.

³¹ Chief Anthony Morales, Letter to Governor Gray Davis, Mayor James Hahn, and California State Parks Acting Director Ruth Coleman (February 2003).

³² See generally Jean Bruce Poole and Tevvy Ball, EL PUEBLO: THE HISTORIC HEART OF LOS ANGELES (2002); El Pueblo de Los Angeles State Historic Park General Plan (1981).

³³ The Pueblo included the area between what is today Exposition Boulevard on the south, Fountain Avenue on the north, Hoover Street on the west and Indiana Avenue on the east. Blake Gumprecht, *supra*, at 311 n.12.

³⁴ Carey McWilliams, SOUTHERN CALIFORNIA: AN ISLAND ON THE LAND 60-61 (1973); Jean Bruce Poole and Tevvy Ball, *supra*, at 26-27.

³⁵ Leonard Pitt and Dale Pitt, LOS ANGELES A TO Z: AN ENCYCLOPEDIA OF THE CITY AND COUNTY 475 (1997).

³⁶ See, e.g., Carey McWilliams, NORTH FROM MEXICO: THE SPANISH-SPEAKING PEOPLE OF THE UNITED STATES 176 (Matt S. Meir ed. 1990); David M. Kennedy, FREEDOM FROM FEAR 164-65 (1999).

³⁷ See Carey McWilliams, *supra*, at 220-31.

³⁸ Leonard Pitt and Dale Pitt, *supra*, at 571-72.

³⁹ See generally Stephen E. Ambrose, NOTHING LIKE IT IN THE WORLD: THE MEN WHO BUILT THE TRANSCONTINENTAL RAILROAD 1863-1869 at 150-51 (2000); David Howard Bain, EMPIRE EXPRESS: BUILDING THE FIRST TRANSCONTINENTAL RAILROAD 205-07 (1999).

⁴⁰ See Robert S. Greenwood, DOWN BY THE STATION: LOS ANGELES CHINATOWN, 1880-1933 at 10-12, 37-40 (1996); James P. Allen and Eugene Turner, CHANGING FACES, CHANGING PLACES: MAPPING SOUTHERN CALIFORNIANS 37 (2002) [hereinafter "*Changing Faces*"]; Brian Niiya, ed., ENCYCLOPEDIA OF JAPANESE AMERICAN HISTORY (2001) at 111-12 [hereinafter "*Japanese American History*"].

⁴¹ Image courtesy of the Los Angeles Public Library.

⁴² *Japanese American History* at 136, 116.

⁴³ *Id.*

⁴⁴ Image from Dolores Hayden, *supra*, at 25.

⁴⁵ *Korematsu v. U.S.*, 319 U.S. 432 (1943).

⁴⁶ Dolores Hayden, *supra*, at 215.

⁴⁷ *Japanese American History* at 111-12, 140.

⁴⁸ Dolores Hayden, *supra*, at 210-25.

⁴⁹ Jean Bruce Poole and Tevvy Ball, *supra*, at 11.

⁵⁰ *Id.* at 30-31.

⁵¹ *Scott v. Sandford*, 60 U.S. 393, 407 (1857).

⁵² Dolores Hayden, *supra*, at 168-87.

⁵³ The United States Supreme Court ultimately declared restrictive housing covenants unconstitutional and unenforceable in *Shelley v. Kramer*, 334 U.S. 1 (1948).

⁵⁴ For example, the Federal Housing Administration Manual of 1938 states: "If a neighborhood is to retain stability, it is necessary that properties shall continue to be occupied by the same racial classes. A change in social or racial occupancy generally contributes to instability and a decline in values." See also Mike Davis, CITY OF QUARTZ 160-64 (1990); Mike Davis, *How Eden Lost Its Garden*, chapter in ECOLOGY OF FEAR (2000).

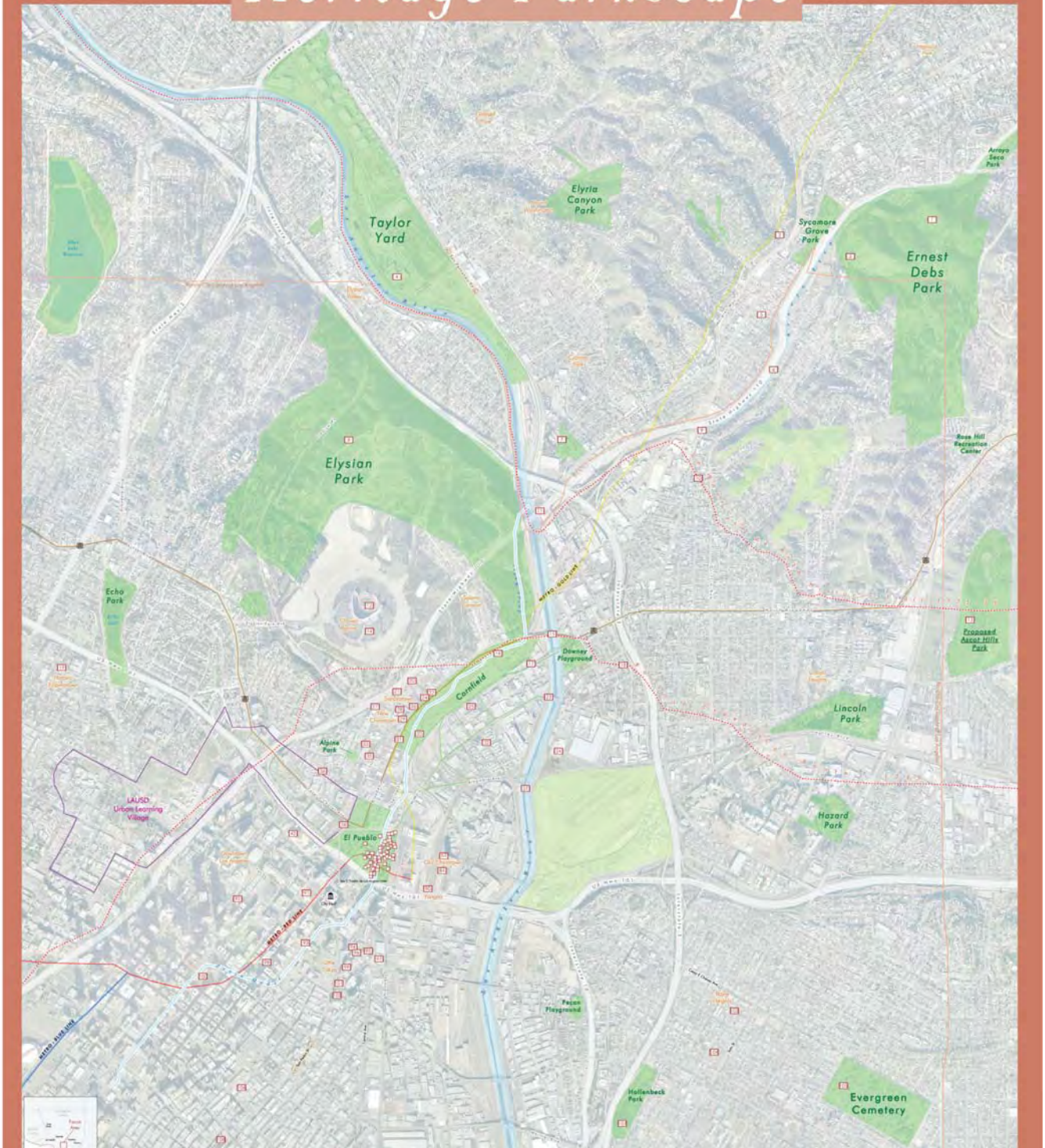
⁵⁵ Image from Carolyn Kozo Cole and Kathy Kobayahsi, SHADES OF LA: PICTURES FROM ETHNIC FAMILY ALBUMS 92 (1996).

⁵⁶ California Department of Parks and Recreation, FIVE VIEWS: AN ETHNIC SITES SURVEY FOR CALIFORNIA 68-69 (1988).

⁵⁷ *Changing Faces* 16-20.

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- ⁵⁸ Cornfield State Park Advisory Committee Recommendations Report (April 2003), Attachments I, II.
- ⁵⁹ Image courtesy of the Los Angeles Public Library.
- ⁶⁰ Photo by Robert García (2004). See Leonard Pitt and Dale Pitt, *supra*, at 555.
- ⁶¹ Cornfield State Park Advisory Committee Recommendations Report 12-13
- ⁶² “State Parks Director Coleman Responds to Critics of Cornfield Plan,” *The Planning Report* (July 2003).
- ⁶³ Photo by Robert García (2002).
- ⁶⁴ Photo by Robert García (2003).
- ⁶⁵ Cornfield State Park Advisory Committee Recommendations Report 9.
- ⁶⁶ *Five Views* is available online at http://www.cr.nps.gov/history/online_books/5views/5views.htm.
- ⁶⁷ *Id.* at 6 and Appendix of Cultural, Historical, and Recreational Links.
- ⁶⁸ Robert García, *et al.*, “The Heritage Parkscape in the Heart of Los Angeles,” (Center for Law in the Public Interest 2003), available online at www.clipi.org.
- Parkscape: linked parks with distinguishing characteristics and features, esp. considered as a product of modifying or shaping processes and agents; a bird's-eye view, plan, sketch, or map of same. From OED, landscape.
- ⁶⁹ See Robert García, *The Legacy of Rodney King and a Testament of Hope*, 8 AM. BAR ASS'N GOAL IX 6 (2002).
- ⁷⁰ See Robert García, *et al.*, “Ecology of Hope: Diversifying Access to and Support for the Forests” (forthcoming Center for Law in the Public Interest 2004).
- ⁷¹ Dolores Hayden, *supra*, at 9-10.
- ⁷² See generally Harvard University Graduate School of Design Department of Landscape Architecture, George Hargreaves, ed., *LA river studio | book* (2002); Harvard Design School, Richard Sommer & Mary Margaret Jones, eds., *SUPERNATURAL URBANISM* (2003); UCLA School of Public Policy and Social Research, *CORNFIELD OF DREAMS: A RESOURCE GUIDE OF FACTS, ISSUES, & PRINCIPLES* (2000).
- ⁷³ (Inside back cover) The Heritage Parkscape map was produced by the Center for Law in the Public Interest with Greeninfo Networks (2004).

Heritage Parkscape



The Cornfield is a critical component of the Heritage Parkscape that will link over 100 historical, cultural, recreational, and environmental resources in the heart of Los Angeles.⁷³

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**Public Art in the Public Park:
People, Place, and Power in the Los Angeles State Historic Park
Robert García, Erica F. Baltodano, Christopher T. Hicks¹
Policy Brief**



PUBLIC ART IN THE PARK

Public art in the new Los Angeles State Historic Park at the Cornfield site should reflect the struggles, hopes, and triumphs of the generations who have entered Los Angeles through El Pueblo and the Cornfield to reflect the dreams of the community, the purpose of the park, and the vision of the Cornfield Advisory Committee. Murals that tell the history of the people and place; community art projects including photography exhibits and oral histories that serve as "family albums" to allow others to see the park through the eyes of the people today; signs, lamppost banners, and other interpretive materials; educational programs for school children; and links to myriad nearby cultural, historical, recreational, and environmental resources can engage the community fully and fairly in the inaugural project for the park. Exhibits can be connected with El Pueblo Historic Monument and the Southwest Museum. The experience of public art that engages and tells the stories of the community in these ways can remain a part of the legacy of the park, and enhance the interim use project and the ephemeral proposal to grow corn there, without compromising the general plan.



THE VALUES AT STAKE

According to the State Department of Parks and Recreation, "The purpose of the Los Angeles State Historic Park is to provide the public with a place to learn about and to celebrate the ethnically diverse history and cultural heritage of Los Angeles. . . . The Park will bring a wide range of visitors together to examine and experience the complete story of Los Angeles. It will be a sanctuary from the dense, urban environment that surrounds it. The Park will connect abstract historical and social patterns to the personal experiences of Angelenos and visitors from throughout the state, the nation, and the world."² This purpose reflects the vision of the legislatively-mandated Advisory Committee that calls for the park to encompass the essential themes of culture and history, connectivity, recreation, and transportation: "A park in the Cornfield should be connected to the struggles, the histories, and the cultures of the rich and diverse communities that have surrounded it since it was settled."³ The Committee specifically called for "murals and other forms of public art" to "create common understanding and celebration of the ethnic, religious, and cultural traditions that were once present, or are now present in Los Angeles."⁴



Family album with photos and story of Old and New Chinatown (L.A. Public Library).

Public art in the public park should reflect the values at stake to bring people together -- providing children the simple joys of playing in the park, improving recreation and health, equal access to public resources, democratic participation in deciding the future of the community and park, educating the public, local jobs for local workers and economic vitality for all, spiritual values of promoting peace and justice, and providing clean air, water, and ground benefits of safe and healthy urban parks.

¹ Robert García is Executive Director, Erica F. Baltodano is Assistant Director, and Christopher T. Hicks is Policy Director at the Center for Law in the Public Interest.

² California Department of Parks and Recreation, Proposed Declaration of Purpose for Los Angeles State Historic Park.

³ Cornfield State Park Advisory Committee Recommendations Report.

⁴ Cornfield State Park Advisory Committee Recommendations Report.

Public art that reflects these values will revive the forgotten history of Los Angeles and call the attention of the world to the new world class park in the Ellis Island of Los Angeles. This park is a heroic monument and symbol of hope for the people who made the park happen.

The people who live near the park are disproportionately people of color who live in poverty, have no car, have limited education, and lack parks and green space. 282,967 children live within five miles. These children do not have places to play in parks, schools, or yards. Fully 85% of Los Angeles public school children are not physically fit. Opportunities for recreation should not be delayed. Tongva Chief Anthony Morales urges people to “work together to ensure that the children of the Cornfields and [nearby] Taylor Yard are not displaced the way the Tongva people once were.”⁵

THE HISTORY AND PEOPLE

The park lies just south of the confluence of the 51-mile Los Angeles River and the 22-mile Arroyo Seco, in one of Los Angeles’s most culturally, historically, and ethnically diverse—and park-poor—communities. The park, an abandoned rail yard for over 12 years, is downtown between Chinatown on the west and the Los Angeles River on the east, within walking distance of City Hall, and down the hill from Chavez Ravine.

The park lies near the site of the original Tongva village of Yangna, a site marked today by nothing more than a center divider on the Hollywood Freeway. Los Pobladores, the first settlers, included Spaniards, Catholic missionaries, Native Americans, and Blacks. Mexicans and Californios further established the city before statehood. Mexican-Americans, including U.S. citizens, were deported from the Cornfield during the depression because of discrimination and the struggle for jobs. Mexican-Americans later lost their homes and way of life when Chavez Ravine was destroyed to build Dodger Stadium with places for 50,000 cars to park and not a single place for children to play. Chinese began arriving in 1850 in search of gold and were relegated to dangerous jobs on the railroad and domestic jobs. The site of the Chinatown massacre of 1871, which first brought Los Angeles to international attention, is now a traffic light. The city forcibly evicted the residents and razed Old Chinatown to build Union Station in the 1930s. The people relocated to new Chinatown across the street from the park. The Japanese in Little Tokyo were forced into concentration camps during World War II. Biddy Mason, a former slave freed in the 1850s, became a major landowner downtown and a founder of First AME, a major Black church in Los Angeles. Blacks in the twentieth century were forced into South Central by discriminatory land use policies. Italian and French immigrants, some of whom planted vineyards that graced the area, assimilated into the broader culture. The Women’s Building that has empowered women artists stands at the site.

Historically, the zanja madre or "mother trench" brought water from the Los Angeles River through the site to El Pueblo and beyond. The area was used for diverse agricultural purposes, including vineyards, vegetables, fruits and nuts, corn, pasture, and plowed land. The diversity of crops is a metaphor for the diversity of the people themselves.

Public art in the park can reflect the power of place: “The power of ordinary urban landscapes to nurture citizens’ public memory, to encompass shared time in the form of shared territory . . .

Within 5 miles of the Park

68% Latino
14% Asian
11% non-Hispanic white
4% African American
49% Completed H.S.
15% Bachelor’s Degree
30% Live in poverty
29% No access to a car



Biddy Mason home.

⁵ Letter from Chief Anthony Morales to Governor Gray Davis, Mayor James Hahn, and State Parks Director Ruth Coleman (Feb. 2003).

. And even bitter experiences and fights communities have lost need to be remembered—so as not to diminish their importance.”⁶

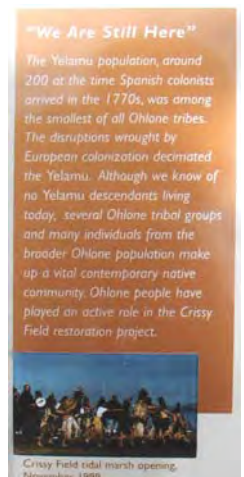
VALUABLE LESSONS

Public art now can be an integral part of the inaugural project and the legacy of the park. Crissy Field in San Francisco tells the history of the people and place through interpretive signs, and proudly proclaims how people participated in creating the park. Ohlone representatives, for example, signed an agreement with the National Park Service concerning the interpretation of Ohlone culture, and collaborated in preparing the exhibit. Crissy Field itself is dedicated to those who made the dream of restoring the park a reality.



A distinctive icon links Crissy Field and other sites along the San Francisco Bay Trail. An icon can be created for the Heritage Parkscape to link the Los Angeles State Historic Park with El Rio de Los Angeles State Park, El Pueblo de Los Angeles Historic Monument, and other resources throughout the region, as discussed below. A trail around the park can provide space for jogging and walking, like RIP (Run in Peace) around Evergreen Cemetery in East L.A.

The mission of Manzanar National Historic Site is to stimulate and provoke greater understanding of, and dialogue on, civil rights, democracy, and freedom by faithfully, completely, and accurately telling the story of Manzanar. The nearby Little Tokyo Historic District and Bidy Mason Park offer valuable insights for public art that tells the story of diverse people.

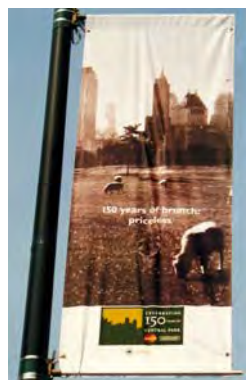


Interpretive signs along “Angel’s Walk” in Los Angeles tell part of the history of the region, but leave out critical facts. The sign outside Union Station, for example, ignores the destruction of old Chinatown. Signs in the new park and along the Heritage Parkscape can tell the full story of all the people of Los Angeles.



To celebrate the 150th Anniversary of Central Park, banners telling the history of the park and the people adorned lampposts throughout New York City. Banners could tell the story of the Los Angeles State Historic Park and the people here now.

The General Plan for El Pueblo de Los Angeles State Historic Park offers a blueprint to create a world class park here (see www.clipi.org). The California Department of Parks and Recreation has also published *Five Views: An Ethnic Sites Survey for California (1982)* that stresses the public's need to become more aware of California's cultural diversity and its tangible manifestations on the land that can guide the new park here.



A community approach that incorporates images such as those in the *Great Wall of Los Angeles* that illustrate this Policy Brief and community art projects that interweave historical images and personal reactions, and new images created by the people could work here.

RECOMMENDATIONS

The Center for Law in the Public Interest and Anahuak Youth Soccer Association have long supported public art in the park, and have spearheaded the creation of a park that serves the needs of the community as defined by the community. See the *Cornfield and the Flow of History: People, Place, and Culture (CLIFI 2004)*; *Dreams of Fields (CLIFI 2003)*; The

⁶ Dolores Hayden, *The Power Of Place; Urban Landscapes As Public History* (1995).

Heritage Parkscape in the Heart of Los Angeles (CLIPi 2003). These documents are available on the web at www.clipi.org. The Center saved Watts Towers, an icon of public art, from destruction in the 1980s.⁷

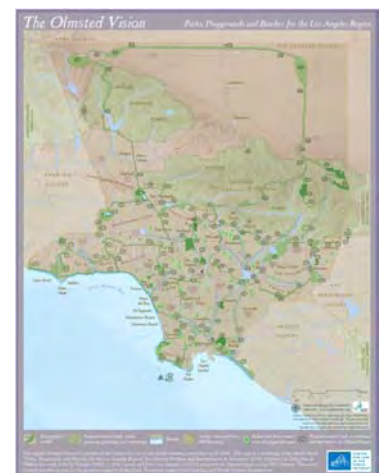
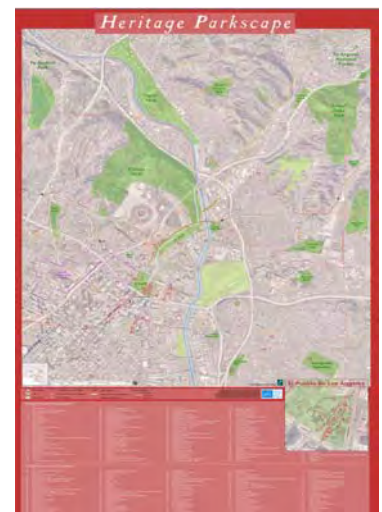
We urge public officials and the public to support public art in the Los Angeles State Historic Park that reflects the values at stake and: (1) directly engages community participation and benefits surrounding communities; (2) tells the story of the people and cultures who are integral to the past, present, and future of the park; (3) includes murals, interpretive signs and street banners to educate visitors about the history of the site; (4) honors the diverse community coalition that created the park; (5) includes murals, community art, photography exhibits, and oral histories as "family albums" and local artists to reflect the views and experiences of the surrounding communities; (6) provides educational programs and materials for schools on the environment, the history, and the people; (7) does not delay the interim use plan for and recreation in the park; and (8) is connected with local art projects and interpretive displays in the historical buildings at El Pueblo and at the Southwest Museum.

THE BROADER VISION

The theme of connectivity identified by the Cornfield Advisory Committee can link the new Los Angeles State Historic Park, El Pueblo de Los Angeles Historic Monument, the new Rio de Los Angeles State Park, and 100 other cultural, historical, recreational, and environmental resources in the ways described above. The footprint of this Heritage Parkscape coincides closely with the Olmsted vision for parks and greenspace for downtown and along the Los Angeles River. What better way to celebrate the 75th anniversary of the Olmsted plan this year. We can restore a part of that vision and the lost beauty of Los Angeles through a comprehensive and coherent web of parks, playgrounds, schools, beaches, forests, and transportation that promotes human health and economic vitality, and reflects the diverse cultural urban landscape. Public art in the park is an integral part of that collective vision.



Guatemalan Nobel Peace Laureate Rigoberta Menchu with Anahuak praising these new urban parks as a way of giving children hope and saving no to violence and war.



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2005

⁷ Bud and Arloa Paquin Goldstone, The Los Angeles Watts Towers (Getty Conservation Institute and Getty Museum 1997).

Dreams of Fields: Soccer, Community, and Equal Justice

Report on Sports in Urban Parks to the
California Department of Parks and Recreation

Robert García
Erica S. Flores
Elizabeth Pine
Center for Law in the Public Interest



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AT THE CENTER FOR LAW IN THE PUBLIC INTEREST**

The mission of The City Project is to achieve equal justice, democracy, and livability for all by influencing the investment of public resources to achieve results that are equitable, enhance human health and the environment, and promote economic vitality for all communities. Focusing on parks and recreation, schools, and transportation, The City Project works with diverse coalitions to shape public policy and law and to serve the needs of the community as defined by the community.

Dreams of Fields: Soccer, Community, and Equal Justice

Report on Sports in Urban Parks to the
California Department of Parks and Recreation

December 2002

Robert García
Erica S. Flores
Elizabeth Pine

Center for Law in the Public Interest¹

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I. Executive Summary

One of the broadest and most diverse alliances ever assembled behind any issue in Los Angeles joined together to support the creation of balanced parks in the Cornfield and Taylor Yard with large multi-use fields for soccer and other sports that fit harmoniously with the natural settings and the cultural and historical values at stake. Governor Gray Davis stood on the Cornfield with the children of the Anahuak Youth Soccer Association to celebrate the purchase of the land for the two state parks. State and local elected leaders support playing fields in the park. Advocates for peace and justice, including Guatemalan Nobel Peace Laureate Rigoberta Menchú and Cardinal Roger Mahony, support playing fields in the parks. Editorials in the Los Angeles Times, planning reports from the State, and academic reports from UCLA have consistently highlighted the need for the state parks in the Cornfield and Taylor Yard to alleviate the desperate need for soccer fields in a City and a neighborhood that are park-poor. Community, civil rights, environmental justice, and environmental leaders support multi-use playing fields for soccer and other organized team sports.

Fields for soccer squarely fulfill the State Parks mission. Soccer improves human health, inspires players and fans, and educates players through life-long lessons in teamwork, leadership, and self-esteem. Soccer is played on flat open space in harmony with natural settings. Soccer is among the most valued cultural and historical resources for Latino and other immigrant communities. Soccer provides an alternative to gangs, crimes, drugs, violence, prostitution, and unwanted pregnancies. Soccer is a central part of the social meaning diverse communities give to parks.

State Parks provides fields for soccer, polo, baseball, softball, and other organized sports in harmony with natural settings in the Malibu Bluffs, Will Rogers and Pfeiffer State parks. Simple justice requires soccer fields in the Cornfield and Taylor Yard.

The history of the Cornfield and Taylor Yard is the history of struggle, hope and triumph for the community. Children who dream of soccer fields and their families and friends are entitled to equal access to playing fields in the parks they struggled to create. State Parks has stated its commitment to serve that need. This Report outlines the public policy and legal grounds to create balanced state parks in the Cornfield and Taylor Yard with large multi-use fields for soccer and other sports.

Our specific recommendations appear on pages 27-28.

II. The Vision

A. The State Parks in the Cornfield and Taylor Yard

The California Department of Parks and Recreation (“State Parks”) needs to create balanced parks in the Cornfield and Taylor Yard that include multi-use fields for soccer and other sports that are harmonious with the natural setting and the cultural and historical values at stake, in order to serve the needs of the community as defined by the community.²

The Cornfield offers a once-in-a-century opportunity to create a world-class park, playing fields and other compatible uses in one of the City’s most diverse and park-poor communities. In addition to creating playing fields and open space in neighborhoods that

have none, a park in the Cornfield will preserve invaluable cultural and historic resources at the birthplace of Los Angeles, create quality jobs, increase tourism, increase property values and promote economic revitalization of the community.³

The Anahuak Youth Soccer Association (“Anahuak”) has consistently sought a balanced 103 acre river park at Taylor Yard, with playing fields on the 40 acre Parcel D and habitat restoration on other parcels in the park.

We support a balanced river park to serve the needs of the community with passive as well as active recreation and soccer fields. We are trying to be sensitive to all of our neighbors’ needs, as well as our own. We do not want to ignore especially the older folks who have been longing for a beautiful place to walk with their children and grandchildren. The cool breezes and oxygen that could be produced by true habitat restoration could bring health benefits to our children that play in this smog laden environment.

This prospect of a balanced park can serve as a model of cooperation and coalition building for areas throughout L.A. to make both passive and active recreation possible. We just pray we will be able to get playing space on the fields that are created for soccer.⁴

In 1930, the sons of the great landscape architect Frederick Law Olmsted presented a plan for a wealth of parks, playing fields and recreation that would have made Los Angeles one of the most beautiful and livable regions in the world. According to the Olmsted Report in words that remain true today:

Continued prosperity [in Los Angeles] will depend on providing needed parks, because, with the growth of a great metropolis here, the absence of parks will make living conditions less and less attractive, less and less wholesome. . . . In so far, therefore, as the people fail to show the understanding, courage, and organizing ability necessary at this crisis, the growth of the Region will tend to strangle itself.⁵

Civic leaders and private interests failed to implement that vision in 1930. The Cornfield and Taylor Yard offer the opportunity to restore part of that vision and the lost beauty of Los Angeles.

B. The Demographics of the Cornfield and Taylor Yard

Los Angeles is park poor. Los Angeles has fewer acres of parks per 1,000 residents than any major city in the country. Los Angeles has less than one acre of park per thousand residents, compared to the ten acres that is the National Recreation and Park Association standard.

There are also unfair disparities in access to parks and recreation. The children of the Cornfield and Taylor Yard do not have enough parks in their neighborhoods, and do not have adequate access to cars or a decent public transit system to reach the neighborhoods where the parks are. The Cornfield and Taylor Yard are in City Council District 1. District 1 has .9 acres of parks per thousand residents, compared to 1.7 acres in disproportionately white and relatively wealthy parts of Los Angeles. Taylor Yard borders District 13, which has .3 acres of parks per thousand residents.⁶

The children of the Cornfield and Taylor Yard are disproportionately low income children of color. The community within a five mile radius of the Cornfield is 68% Latino, 14% Asian, 11% non-Hispanic white, and 4% black. Thirty percent of the population lives in

poverty, compared to 14% for the State of California as a whole. The median household income is \$28,908 – just 60% of the \$47,493 median household income for the State. The population of California is 32% Latino, 10% Asian, 47% non-Hispanic white, and 6% black.⁷

The community within a five mile radius of Taylor Yard is 56% Latino, 17% Asian, 20% non-Hispanic white, and 4% black. Twenty-seven percent lives in poverty. The median household income is \$32,863, just 69% of that for the State.⁸

There are 282,967 children within five miles of the Cornfield. There are 235,000 children within five miles of Taylor Yard.⁹

C. State-wide Access to Parks and Recreation

Equal access to parks and recreation is a state-wide concern. According to a recent survey on Californians and the environment, sixty-four percent of Californians say that poorer communities have less than their fair share of the environmental benefits of well-maintained parks and recreational facilities. Latinos are far more likely than non-Hispanic whites (72% to 60%) to say that poorer communities do not receive their fair share of parks and recreational facilities. A majority of residents (58%) agree that compared to wealthier neighborhoods, lower-income and minority neighborhoods bear more than their fair share of the environmental burdens of toxic waste and polluting facilities.¹⁰

Although – or because – communities of color and low income communities are disproportionately denied the benefits of parks and recreation, these communities were the biggest supporters of California’s recent Proposition 40 – the largest resource bond in United States history, with \$2.6 billion for parks, clean water and clean air. Prop 40 passed with the support of 77% of black, 74% of Latino voters, 60% of Asian, and 56% of non-Hispanic white voters. Seventy-five percent of voters with an annual family income below \$20,000 and 61% with a high school diploma or less supported Prop 40 – the highest among any income or education levels.¹¹

D. Soccer and the State Parks Mission

Fields for soccer squarely fulfill the State Parks mission. The primary State Parks mission is to provide for the “**health, inspiration and education** of the People of California,” and to do this by “creating opportunities for high-quality outdoor **recreation**” and “protecting its most valued **natural and cultural resources**.”¹² Soccer fulfills these five elements for individuals and the community. Soccer improves human health, inspires players and fans, and educates players through life-long lessons in teamwork, leadership, and self-esteem. Soccer is played on flat open space in harmony with natural settings. Soccer is among the most valued cultural and historical resources for Latino and other immigrant communities.¹³

The State Parks mission needs to be interpreted in light of California law defining environmental justice as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies,” as discussed below.¹⁴

III. There Is Overwhelming Support for Soccer in the Cornfield and Taylor Yard

A. Governor Gray Davis and State Leaders Support Playing Fields

The soccer playing children of the Cornfield and Taylor Yard have a friend in California Governor Gray Davis. Governor Davis stood on the Chinatown Cornfield with the children of the Anahuak Youth Soccer Association in December 2001 to celebrate the purchase of the Cornfield and Taylor Yard for the first open space and recreation complex ever developed by State Parks in the heart of Los Angeles. The Governor's press release proclaims that the recreation complex will include "multi-use recreational fields" through a "groundbreaking arrangement" in which Mayor James Hahn committed \$800,000 a year from the City of Los Angeles.¹⁵ Mayor Hahn told the crowd he was proud that the City would be responsible for maintaining and preserving the green areas.¹⁶



*Governor Gray Davis celebrating the purchase of the Cornfield and Taylor Yard with the children of the Anahuak Youth Soccer Association.*¹⁷

The audience rose to its feet in a standing ovation as Governor Davis arrived at the celebration, and dozens of soccer players chanted his name. One woman held a sign reading, "Gracias Santa Davis." "Now, instead of playing in the street, the children will have a place to play," said Santo Palacios, a soccer coach with Anahuak who brought a gaggle of young soccer players to the event, according to the *Los Angeles Times*.¹⁸ "We do not have a place to play soccer, and when we go to nearby parks to practice they kick us out," Coach Palacios told *La Opinion*. "Today our children's dreams of having their own place to play soccer have come true, and the struggle is over after so many years."¹⁹

Antonio Villaraigosa was instrumental in creating the parks in the Cornfield and Taylor Yard as Speaker of the California Assembly and as the principal author of the Proposition 12 park bond. Then-Speaker Villaraigosa made money available in the State

budget and worked with Governor Davis and State Parks to buy the land at the Cornfield and Taylor Yard for an urban park with fields for soccer and other sports.²⁰ Speaker Villaraigosa recently reiterated his support for organized soccer in the Cornfield and Taylor Yard at the Tournament for Liberty and Peace sponsored by Anahuak on November 16, 2002.

State Parks Director Rusty Areis also played a key role in creating the parks at the Cornfield and Taylor Yard. He emphasized that State Parks understands the need for soccer and other active sports in urban parks, including the Cornfield and Taylor Yard. “We’ ve planted our flag in the Cornfield [and] Taylor Yard. We’ re very interested in working with activists who have been in the forefront.” Mr. Areis rejected the view of some advocates for the Los Angeles River parkway that the role of State Parks is solely to preserve natural areas.²¹

B. Urban Park Leaders Emphatically Support Fields for Soccer

The parks at the Cornfield and Taylor Yard reflect years of struggle, hope, and triumph by the community to create urban parks with fields for soccer and other sports. The parks are “the culmination of a broad-based partnership with community groups spanning many years,” as the Governor recognized in his press release.

The key community partners who led the successful struggle for the parks, including the Chinatown Yard Alliance and the Coalition for a State Park at Taylor Yard, made playing fields for soccer and other sports a central element in their mission and organizing campaign to build support for the parks.

Chinatown Yard Alliance.

Playing fields were a central goal for the Chinatown Yard Alliance. The Alliance clearly and consistently emphasized the need for fields for soccer in, for example, its mission statement, the conceptual plan featuring a giant meadow and soccer fields, and advocacy before the Governor, the Legislature, California Resource Secretary Mary Nichols and State Parks Director Rusty Areis.²² The Alliance marshaled supporters to public hearings and organized presentations with the conceptual plan featuring a giant meadow including soccer fields, as reported in the Los Angeles Times.²³ The Chinatown Yard Alliance included over 35 community, civil rights, environmental justice, faith-based, and environmental organizations.²⁴ Neighborhood residents supported the park alternative over the lure of warehouse jobs. But for the struggle of the Alliance to stop federal funding for the warehouse project and to settle the related state litigation, there would be no park in the Cornfield.

Coalition for a State Park at Taylor Yard.

Fields for soccer and other sports were a central goal for the Coalition for a State Park at Taylor Yard. The Coalition clearly and consistently emphasized that Taylor Yard is an ideal site for soccer and other sports, and that the communities of Cypress Park and Glassell Park are in dire need of recreational facilities. The Coalition’s written materials and the conceptual plan for a vast park with playing fields were used to marshal supporters to public hearings and to organize presentations.²⁵ The Coalition even organized a soccer tournament to build support for the park in Taylor Yard in April of 2001. The Coalition included community, civil rights, environmental justice, faith-based, and environmental organizations.²⁶ Neighborhood residents supported the park alternative over the lure of retail

and industrial jobs. But for the efforts of Coalition members to settle the state litigation to stop the proposed commercial/retail project, there would be no park in Taylor Yard.

Anahuak Youth Soccer Association.

Anahuak represents 1,500 children ages 5-17 and their families who live and play soccer in the Cornfield and Taylor Yard communities. They have soccer teams, coaches, leagues, uniforms, balls, and shoes, but not enough places to play. Anahuak, a non-profit organization, was the only community-based organization in the successful litigation that resulted in the State purchasing the first 30-acre parcel of land for a park in Taylor Yard. During the campaign they were offered a significant cash payment to support their own program in exchange for dropping out of the coalition. Anahuak turned down the offer in favor of the recreational needs of the whole community and playing fields in the park.

Rigoberta Menchú, a Mayan woman, was awarded the Nobel Peace Prize in 1992 for her struggle for peace in Guatemala and for human rights around the world. Ms. Menchú was honored at the Tournament of Liberty and Peace sponsored by Anahuak and the Center for Law in the Public Interest on November 16, 2002. She presented trophies to the children and spoke of the value of parks and soccer to the community. Applauding the struggle by Anahuak and the Center to find places for children to play soccer, Ms. Menchú celebrated the role of soccer in “building values that will guide children for a lifetime,” and she urged the authorities to create “a park for peace” with playing fields. Ms. Menchú applauded the activism that resulted in the creation of the parks at Taylor Yard and the Chinatown Cornfield as “a form of saying no to war, no to violence.”



Nobel Laureate Rigoberta Menchú at the Tournament of Liberty and Peace with the children of the Anahuak Youth Soccer Association.²⁷

Concerned Citizens of South Central Los Angeles.

Concerned Citizens of South Central Los Angeles is a leader of the Chinatown Yard Alliance, and served as one of the petitioners in the successful effort to cut off federal funding for the warehouses and related state litigation. Concerned Citizens organized the

Antes Columbus Football Club with Los Angeles Metropolitan Churches to bring diverse communities together. Concerned Citizens emphasized the value of soccer in a letter to Governor Davis. “Our common passion for soccer offers a means to fashion a greater community across racial, cultural, ethnic, religious, political, economic and social boundaries.”²⁸ Concerned Citizens and civil rights advocate Constance L. Rice organized support for playing fields in the Cornfield among the Legislative Black Caucus.²⁹

United Nations Soccer League.

The United Nations Soccer League joined the Coalition for a State Park at Taylor Yard in actively supporting fields for soccer. United Nations has 5,000 children, making it the largest independent youth soccer league in Los Angeles.³⁰

Parks for Los Angeles Youth Soccer (PLAYS).

The PLAYS Project supports fields for soccer in the Chinatown Cornfield and Taylor Yard. The mission of PLAYS (Parks for L.A. Youth Soccer) is to build athletics, academics and leadership in inner city children through soccer teams and green fields. PLAYS is a joint venture of CLIPI and People for Parks that works with Concerned Citizens and other soccer coalitions.

C. Local Elected Officials

Los Angeles County Supervisor Gloria Molina wrote to Resource Secretary Mary Nichols at length about the need for soccer fields and active recreation at Taylor Yard:

I am writing to reiterate my support for the creation of a State Park at the Taylor Yard on the 40 acre Parcel D for soccer fields and active recreation. . . .

As you know, the State has a history of utilizing parkland for soccer fields. For example, the Pacific Palisades American Youth Soccer Organization runs a soccer program at Will Rogers State Park every weekend during soccer season. Community-generated conceptual plans for Baldwin Hills, the “Cornfield,” and Taylor Yards all include soccer fields. These urban state parks are quickly becoming examples of how diverse communities can come together to decide how balanced recreational needs can be achieved.

I have witnessed the success of such programs as the Anahuak Youth Soccer League, which involves 1,400 inner city youth who would otherwise not be able to afford to participate in such a commendable after school recreation program. The nearby soccer fields envisioned at the Taylor Yard would be a vital part of their ability to serve these demonstrated needs.³¹

Assemblymember Gil Cedillo supports state funding for “the first major park, open space and recreational complex ever developed in downtown Los Angeles” at the Cornfield.³² City Councilmember Ed Reyes supports “active park space” at Taylor Yard.³³ Assemblymember Jackie Goldberg, Senator Richard Polanco, and City Councilmember Eric Garcetti have written similar letters of support (“accessible, active recreation space”).³⁴

D. The Press

The Los Angeles Times has repeatedly stressed the need for fields for soccer in the Cornfield and Taylor Yard.

The Times urged Governor Davis to provide state funds to buy the Cornfield on its editorial page because “[t]he simple fact is that in this neighborhood so long ignored by City

Hall, residents need both jobs and amenities like soccer fields, landscaped park space and a cultural center.”³⁵ Urban parks like the Cornfield and Taylor Yard are part of a “Green Explosion” in Los Angeles “[t]hat means more places to play soccer” according to a second editorial.³⁶ The triumph of the Chinatown Yard Alliance in creating a park in the Cornfield “deserves to be looked upon as a heroic monument, and maybe even a symbol of hope” according to the Los Angeles Times Magazine.³⁷

“Neighborhood kids just as badly need soccer fields and other recreation facilities” in Taylor Yard according to a third editorial.³⁸ The park in Taylor Yard “would give people in Cypress Park and surrounding communities much needed soccer fields, riverfront picnic grounds and hiking and biking trails” according to a fourth.³⁹

“What cities need are visionary leaders who look at trashy and tumbleweed-strewn wasteland and see children sprinting over lawns and families picnicking under trees. . . . [W]hen they envision the future of ruined urban property they should take into account the needs of the people who live near it” according to the Times.⁴⁰ Multi-use playing fields in the Cornfield and Taylor Yard will fulfill the needs and dreams of the community.

E. The Religious Community

The Justice and Peace Commission of the Catholic Archdiocese of Los Angeles supports fields for soccer and other sports in the Cornfield and Taylor Yard. The Commission is comprised of lay and religious leaders who represent the widely varied ethnic, economic and professional experience of the 5 million Catholics who live in 287 parishes here in the largest Archdiocese in the country. The Commission urged Housing and Urban Development (HUD) Secretary Andrew Cuomo to require full environmental review of the proposed Cornfield warehouse project, and has focused on the needs of Anahuak for places to play in Taylor Yard.⁴¹ Cardinal Roger Mahony personally wrote to Governor Davis to ask for state funds to create a park in the Cornfield.⁴²

F. The Civil Rights Community

Civil rights leaders, including the Center for Law in the Public Interest Constance L. Rice, the William C. Velazquez Institute, Latino Urban Forum and the Mexican American Legal Defense, support fields for soccer in the Cornfield and Taylor Yard. The Center organized the successful civil rights challenge claiming the warehouse project was the result of discriminatory land use policies that had long deprived communities of color and low income communities of parks.⁴³ The civil rights and environmental justice communities support equal access to parks and recreation, as discussed below.

The civil rights community also recognizes the impact of sports on achieving a just society. Athletes have positively and permanently influenced the movement toward human dignity and a just society through sports. The United States won the first World Cup in women’s soccer in 2000 in the most successful women’s sporting event in history. The success of the women’s team is the product of equal access to athletic opportunities under Title IX of the federal Civil Rights Act, which prohibits discrimination based on sex or gender.

Courageous and pioneering figures like Jackie Robinson and Hank Aaron, who initially had to play segregated baseball and stay in segregated hotels, have acted as champions and role models in the drive for social change. The United States Supreme Court

in *Brown v. Board of Education* struck down the “separate but equal” doctrine, ending legalized segregation in education and leading to the desegregation of American society. *Brown* had an impact on sports and society through the desegregation of parks, school sports programs, Little Leagues, and other sports programs and facilities. Today, the NAACP Legal Defense Fund recognizes the significance of sports in the struggle for equal justice and the vital need for an equitable distribution of parks and other public resources through the Hank Aaron Humanitarian Award in Sports.

G. Traditional Environmentalists

Traditional environmental organizations, including Natural Resources Defense Council, Planning and Conservation League, and Environmental Defense, support fields for soccer and other sports on the Cornfield and Taylor Yard.⁴⁴

IV. Soccer and Organized Sports in State Parks

State Parks provides five fields for soccer and a polo ground at Will Rogers State Park in harmony with the natural setting of the Santa Monica Mountains.⁴⁵



Soccer draws children and their families and friends to the park not only for games but also for other park purposes. They picnic and socialize, hike the trails, or visit the park museum.⁴⁶



AYSO volunteers manage the soccer program and quickly set up and remove portable goals before and after games.⁴⁷



Moments after games, the playing fields lie pristine and abandoned.⁴⁸ Asked whether there are ever any problems between State Parks and AYSO, an AYSO official quickly responds, “Never!”⁴⁹



Simple justice requires fields for soccer in the Cornfield and Taylor Yard, not just at Will Rogers. Families from nearby communities can afford to pay \$60 per child to play soccer with AYSO at Will Rogers. The community within a five mile radius of Will Rogers State Park is an overwhelming 70% non-Hispanic white, and just 12% Latino, 11% Asian, and 3% black. Only twelve percent of the population lives in poverty. The median household income is \$70,333, nearly one and a half times (148%) the Statewide median.⁵⁰

Malibu Bluffs State Park provides fields for soccer dedicated baseball diamonds in harmony with the natural setting. Malibu is 89% non-Hispanic white. Twenty-five percent of the households in Malibu have median annual incomes of \$200,000 or more, compared to

1% of households within a five mile radius of the Cornfield and 2% of households within a five mile radius of Taylor Yard.⁵¹



*Fields for soccer and baseball fields at Malibu Bluffs State Park.*⁵²

State Parks also provides a softball field at Pfeiffer State Park in Big Sur.⁵³

The State Parks and Recreation Commission recently approved a general plan for the Eastshore State Park that will stretch from Richmond to Oakland in Northern California. The plan calls for a wide range of uses, including badly needed formal ball fields for soccer and baseball, grassy fields for informal sports, picnic areas, a seashore promenade, boat launches, and a youth hostel in addition to environmental preserves in various parcels.⁵⁴ Officials said they tried to create a “recreational facility harmonious with its natural setting.”⁵⁵

The urban areas adjoining the Cornfield and Taylor Yard generate high demand for playing fields and facilities to accommodate organized sports programs. Supporters of organized sports and other park supporters have made it clear throughout the planning process that there is a shortage of adequate sports fields and facilities in the region and in particular in the low income communities of color surrounding the Cornfield and Taylor Yard. The Cornfield and Taylor Yard will contribute to the solution of the existing shortages.

V. Developing the Child, Building Community, and Diversifying Democracy: The Value of Soccer and Other Sports

Soccer inspires and educates and provides public health, anticrime, cultural, and historical benefits for individuals and the community. Soccer is also an organizing tool to build community and diversify democracy, as demonstrated by the struggle to create parks in the Cornfield and Taylor Yard.

Fun.

Bringing the simple joys of playing soccer in the park to the children of Los Angeles would be reason enough to accommodate the community demand for fields. Playing soccer is fun, first and foremost. Play is the work of children.

Play is not frivolous. The United Nations established the right to play in the 1959 *Declaration of the Rights of the Child*. A child's right to engage in play and recreational activities is also recognized in Article 31 of the 1989 *United Nations Convention on the Right of the Child*.⁵⁶

Athletics, Academics, and Leadership.

There is more to soccer, however, than having fun. Soccer builds character, pride, self esteem, teamwork, leadership, concentration, dedication, fair play, mutual respect, social skills, and healthier bodies for children; helps keep children in school; and helps develop academic skills to do better in school and in life.⁵⁷

Guatemalan superstar Carlos Ruiz is a role model for the low-income Latino children of the Cornfield and Taylor Yard and others who live, breathe and eat soccer. Ruiz led the Los Angeles Galaxy to its first Major League Soccer championship in 2002, and led Major League Soccer in goals in the 2002 season.

Human Health.

Nearly 40% of California children are not physically fit and more than 25% are overweight. The problem is most pronounced in Los Angeles County, according to a recent comprehensive study of fifth-, seventh-, and ninth-graders. Los Angeles County is home to eight of the nine state Assembly districts with the worst findings. The districts in the County with the highest proportion of overweight children in the state also had the highest concentration of people of color.⁵⁸ The obesity problem is especially acute for children in minority communities – Mexican-American and African-American children are twice as likely as non-Hispanic white children to have a body mass index of more than 25, the definition of overweight.⁵⁹ “Almost all of [the results are] pretty appalling,” according to Dr. Francine Kaufman, a professor and president of the American Diabetes Association, but she called the County numbers particularly striking.⁶⁰ According to Marlene Canter, a member of the Los Angeles Unified School District, “If we don't have healthy kids, we won't have good instruction.”⁶¹

The County and State wide situation reflects an epidemic of obesity for children and others in the United States today. This serious public health problem is the result of urban areas with insufficient parks and disparities in access to active recreation, as in the Cornfield and Taylor Yard communities, as well as marketing by fast-food chains and individual eating habits. In the last three decades, the number of overweight young Americans has tripled, with no sign the trend is abating.⁶² Public health experts say overweight and unfit children face a greater risk of developing lung disease, diabetes, asthma and cancer.⁶³ For the first time, children are being diagnosed with weight-related chronic ailments that usually strike much later in life, including hypertension and Type 2 diabetes. Diseased children, like adults, are at risk for heart and kidney troubles, blindness and limb amputation, but at an earlier age. As they age, these children will strain the health care system.⁶⁴

At the National Institutes of Health, sixteen studies are being financed to study how to change environments to encourage a healthier lifestyle for young people — from day care and after-school activities to educating children about food. Young people in the United States today eat, move, and live quite differently than generations before them. Their lives have become sedentary, with more hours spent in front of a television or computer than at play or doing physical work. Neighborhoods in minority communities often lack adequate safe public places to play and exercise — an essential part of any weight-management equation. Regular exercise and activity can delay or prevent the onset of health complications for an overweight child.⁶⁵

A national survey of more than 14,000 teenagers has found that those who took part in team sports were less likely to have unhealthy eating habits, smoke, have premarital sex, use drugs, or carry weapons.⁶⁶

National surveys by the Centers for Disease Control and Prevention show inequitable disparities in physical activity based on income, race and education. African-Americans and Latinos are more likely than whites to report that they do not participate in any leisure-time physical activity. People with low levels of income and education are also more likely than others to say they participate in no leisure-time physical activity. Black students are more likely than whites to say they did not engage in any recreational exercise in the past week. White students are more likely than black or Latino students to report engaging in vigorous exercise at least three times per week.⁶⁷

Stopping Crime.

Active recreation programs prevent gang violence, crime, prostitution, drug abuse, teen sex, and unwanted teen pregnancies. A 1992 study by the Los Angeles County District Attorney concluded that young people join gangs for the expected reasons, including the fact that they “have been excluded by distance and discrimination from adult-supervised park programs.”⁶⁸ The study recommends that “alternative activities like recreation” should be part of every gang prevention strategy. Organized sports like youth soccer leagues “fill those idle hours that seduce adolescent boys into trouble At the least, they can keep older gang members busy during prime-time-crime hours At the most, they can keep marginal boys too busy for gangs, or give them an excuse not to join.”⁶⁹

In the aftermath of the riots and rebellion following the acquittals of the police defendants in the state trial involving the Rodney King beating, gang members issued a manifesto calling for peace and listing the shortage of parks and open spaces as one of their major concerns.⁷⁰

Today Los Angeles is the murder capital of the nation. Headlines proclaim a war on gangs – which translates into a war on low-income children and children of color. Soccer and other organized sports are a better investment in our youth than criminalizing yet another generation of children of color.

Equal Justice for All.

Athletes have influenced the movement toward human dignity and a just society through sports, as discussed above. Playing fields in the Cornfield and Taylor Yard are a critical step toward equal access to parks and recreation – a dream that is yet to be fulfilled in Los Angeles.

VI. The Cultural Significance of Urban Parks and Soccer

It is necessary to understand the cultural, social and historical significance of urban parks and soccer in designing the parks in the Cornfield and Taylor Yard. Jacques Barzun once wrote that whoever wishes to understand mainstream America had better learn baseball. Whoever wishes to understand Latino Los Angeles – and immigrant L.A., for that matter – had better understand soccer.

A. Cultural Differences in Park Use

People from different racial and ethnic groups use parks differently, constructing meaning for public open space based on their own values, cultures, histories and traditions, according to a UCLA study of cultural differences in the use of urban parks.⁷¹

Hispanics actively appropriate park space, changing it and adding to it to serve their needs. When no soccer fields are present, players adjust the park to their needs, bringing their own portable goals into open spaces. The discrimination against soccer as an “immigrant sport,” manifested in the lack of soccer fields compared to fields for baseball and other sports, often forces players to invade spaces such as picnic areas to create space to play.⁷²

Hispanics more than other groups find the park’s social qualities to be its most valued asset. For Hispanics, the park is primarily a social place. The importance of public space over private space – exemplified by the plaza that is the focal point of the built environment in Central America – leads to a very intensive use of the park by Hispanic groups. Young men bring their dates to the park, families celebrate on its grounds, men fix and wax their cars, men and women dance. Hispanic merchants sell colorful merchandise and fruit in the park.⁷³ The “Latinization of park culture” analyzed in a case study on the Whittier Narrows Recreation Area reinforces the observations in the UCLA study.⁷⁴

Sports facilities and equipment are the most valued elements of the park by African Americans. African Americans, more than any other racial group, engage in sports. The park is a space for organized group sports for African Americans, in addition to being a place for socializing with friends.⁷⁵

Dramatically more than other groups, non-Hispanic whites tend to value a park solely for its passive qualities – its greenness, landscaping and natural elements. Non-Hispanic whites mostly engage in reclusive, self-oriented uses. A larger proportion of non-Hispanic whites come to the park alone to pursue passive recreation. Active uses more commonly include walking, jogging, dog walking, baseball, and tennis. Most studies on leisure and urban recreation have delineated the activity patterns of the non-Hispanic white population, rather than non-white park users or the population as a whole.⁷⁶ The failure to understand the cultural significance of parks and soccer in communities of color and low income communities may account for the tendency of some to favor passive recreation in the Cornfield and Taylor Yard and to oppose soccer and other sports.⁷⁷

The UCLA study found that Asian (Chinese) families were rare in parks studied. This may reflect the mismatch between the needs of the Asian community and the design and programs for the parks.⁷⁸

B. Soccer and Democracy

The first type of Latino immigrant organizations in major cities have been soccer leagues.⁷⁹ New Latino immigrants do not organize politically, they organize soccer leagues. This is demonstrated by the experience in the Cornfield and Taylor Yard communities today. Raul Macías started Anahuak in 1994 to give children a chance to play. Today Anahuak serves 1,500 children and their families as a true grassroots organization that provides citizenship training for its coaches, families, and friends, registers voters, and delivers votes. Assemblymember Jackie Goldberg and Councilmembers Ed Reyes and Eric Garcetti regularly meet with Mr. Macías, a respected community leader, to reach their constituents. Similarly, Roy García, the founder and director of the United Nations Soccer League, has grown from soccer coach to community leader to candidate for the Los Angeles City Council.⁸⁰ Through the struggle for parks in the Cornfield and Taylor Yard, members of Anahuak and United Nations have learned that public officials or wealthy corporations cannot push them around, that they can stand up for their right to equal access to parks and recreation, and that they can go to court and win. Soccer builds democracy.

C. Soccer and Community

The Anahuak and United Nations clubs use soccer as an organizing tool to bring people together. Soccer provides a social network that reduces the financial and social costs of immigrating, eases adjustment to a new culture, language, and life, and serves as a source of valuable information, job contacts, and other resources necessary to survive and to prevail.⁸¹ Immigrants meet regularly at parks to play soccer and share information and resources. Social relationships and organizational ties to soccer teams and leagues intensify social integration, sustain communities, and solidify the settlement process. Youth soccer associations, such as Anahuak and United Nations, offer the added benefit of bringing families together. Parents go to weekly soccer games to watch their children play. At the games, parents talk, learn about employment opportunities, share information with each other, and spend quality time with their children and their neighbors.

Soccer unites other communities as well. For example, the success of Korea in reaching the third place final in the World Cup in 2002 galvanized the community in Los Angeles's Koreatown, as well as in Korea.

Soccer brings diverse communities together. According to Concerned Citizens and the Antes Columbus Football Club, "Our common passion for soccer offers a means to fashion a greater community across racial, cultural, ethnic, religious, political, economic and social boundaries."⁸² Indeed, the World Cup brings billions of people all over the world together every four years.

The first women's World Cup in 1999 galvanized support not just for women's sports, but for equal rights for women all over the world. The historic victory of the USA women's team in that game built support for equal rights, for women's sports, and for soccer in the United States.

The men's World Cup held in Los Angeles in 1994, the women's world cup held in Los Angeles in 1999, and the USA national team advancing to the quarter finals in Korea in 2002 have strengthened national pride and reinforced the significance of soccer in the United States.

The cultural and historical significance of soccer for Latinos is reflected in the history of the World Cup. Uruguay hosted and won the first World Cup in 1930 against Argentina. Hispanic nations including Brazil have hosted 7 and won 9 of the 17 World Cups. Soccer bears a special place in Latino culture and history, akin to jazz in African-American culture and history.

D. Soccer Is the Simplest Game and the Beautiful Game

Fields for soccer are harmonious with the natural setting and the cultural and historical values at stake in creating parks in the Cornfield and Taylor Yard.

According to Pelé, the greatest soccer player of all time, soccer is “the simplest game” and “the beautiful game” and “perhaps that’s the same thing. The simple beauty, the beautiful simplicity that has made soccer the world’s favorite sport.”⁸³ Soccer is the only organized sport in many countries of the world. Soccer appeals to the masses and is harmonious with any natural setting because soccer requires minimal equipment: a ball, a place to kick it, and enough people to play against each other by putting the ball through a goal. Uniforms are not complicated or expensive – shorts and tee shirts and shoes and shin guards are sufficient, and portable goals can be put up and taken down in minutes. Children around the world play barefoot and shirtless without a ball using a tin can or a bunch of rags or a wad of newspaper.⁸⁴ Children in poor communities from Brazil to Korea to Nigeria to France to the inner city of Los Angeles will play soccer on any flat field. Soccer does not require a dedicated field like most other organized sports, or a mound and backstop like baseball, or fixed goal posts like football, or a blacktop or concrete surface like basketball. An open, flat, grassy space provides all the permanent facilities required for Los Angeles children to reinforce their community and cultural ties through their favorite sport.

E. Culture, History and the Tongvas

The Tongva Indians settled the area near the Cornfield and Taylor Yard before the arrival of the Spaniards. According to Chief Anthony Morales and tribe member Mark Acuna, Tongva families played “shinny,” a game similar to soccer, and enjoyed other field sports along the river. Chief Morales and Mr. Acuna support the importance of positive active recreation for children along the Los Angeles River today.

“California’s native games and toys are a reflection of the natural history of the state—its mountains, rivers, deserts, wetlands, woodlands, and seashore—and California’s first people.”⁸⁵ Native Californians had a “passion for football-type games.”⁸⁶ They “drove, tossed, or batted balls of mountain mahogany, braided buckskin, or polished stone, stuffed deerhide or seasoned laurel knots.”⁸⁷ In most shinny- and soccer-like games, teams tried to score by getting the ball past the other team and through goal posts, or through a hole.⁸⁸ Soccer-like games involving balls and goal posts were river games—games played along river beds throughout California.⁸⁹

Other antecedents of soccer today have been traced to China in 1697 B.C., Japan one thousand years later, Roman times, and the first written rules in nineteenth century England.⁹⁰

State Parks is committed to honoring the cultures and histories of the people of the Cornfield and Taylor Yard in designing and operating the new parks. Soccer and other

organized team sports have been and continue to be a rich part of that culture and history and should be a part of those parks.

VII. Planning Reports Call for Soccer and Organized Sports

A. State Cornfield Study

The California Department of Resources and the Department of Parks and Recreation presented two alternatives for the Chinatown Cornfield in Sacramento in March 2001. Both alternatives included playing fields for soccer and other active sports: “Open space/playfields . . . The open space playfield area would also be a multipurpose space able to accommodate active field sports such as soccer, outdoor experience training, picnicking, and storm water retention.”⁹¹

B. Coastal Conservancy Study for Taylor Yard

The community called for fields for soccer and other active recreation at the Taylor Yard acquisition hearing on November 14, 2001, with testimony in writing from Anahuak, United Nations Soccer League, Center for Law in the Public Interest, and PLAYS.⁹²

In March 2002, after Governor Davis stood arm in arm with the children of Anahuak to celebrate the purchase of the recreational complex at Cornfield and Taylor Yard, the California Coastal Conservancy study included an alternative (Alternative IV) with four playing fields in the Taylor Yard Multiple Objectives Feasibility Study. Anahuak, the Center for Law in the Public Interest, PLAYS and others supported Alternative IV because it was a balanced plan that included fields for soccer and active recreation as well as passive recreation.⁹³

The California Department of Parks and Recreation again heard widespread demand from the community for recreational activities including fields for soccer at the public hearing on Taylor Yard on June 20, 2002 and November 6, 2002.⁹⁴

C. UCLA Cornfield Study

The UCLA School of Urban Planning report on the Cornfield specifically recommends that the park include fields for soccer: “Due to . . . the lack of adequate playing fields in the vicinity of the Cornfields, a park on the site should certainly integrate use by local soccer and other sports leagues into its program. Providing active recreation opportunities such as soccer to urban youth promotes community development and children’s self esteem and ambition. It also ensures that the park is well used and vibrant on weekends when entire families come out to watch matches.”⁹⁵

The UCLA report emphasizes the cultural significance of soccer and parks in the Latino community:

Public space plays an important role in Mexican and Mexican American culture, and their social activities often involve larger groups. Most park activities involve family members and food. Often park spaces are appropriated to meet their needs, for instance by creating soccer fields where there are none. Parks are used as social spaces, and seem to act much as the plazas do in traditional Mexican towns.⁹⁶

D. UCLA Taylor Yard Study

The UCLA study on Taylor Yard calls for a balanced park including seven soccer fields, a nature habitat for hikers, bicyclists and equestrians and other amenities. Placing fields for soccer and other active recreation facilities on the 40 acre parcel D is key to the vision of traditional conservationists because it is farther from the river and closer to the neighboring community, while the 62 acre parcel G down by the riverside would provide a more natural riparian habitat.⁹⁷

E. Olmsted Report

The Olmsted Report recommended that Elysian Park – which borders the Cornfield on the Northwest – be enlarged by acquiring all of Chavez Ravine so that “the entire ravine can be devoted to recreation and made a part of the park.”⁹⁸ The Report also stressed that the Cornfield vicinity is ideal for large athletic fields: “The bottom of Chavez Ravine near the easterly end is easily accessible from the city and would make an ideal place for athletic fields of large size to serve large crowds.”⁹⁹

Instead of creating parks and athletic fields in Elysian Park and the Cornfield, public officials betrayed the Latino community in Chavez Ravine by forcibly evicting residents, who were promised a new federally subsidized housing project in place of their existing homes.



Los Angeles County Sheriff's deputies forcibly evict Mrs. Aurora Vargas, 36, from her home at 1771 Malvina Avenue in Chavez Ravine (May 9, 1959).¹⁰⁰

No sooner did public officials get the land than they broke their promises to the people and sold the land to the Dodgers to build a stadium. The Dodgers drowned Chavez Ravine and Elysian Park in a sea of asphalt that provides parking for 50,000 cars but no place to play.¹⁰¹ Today, *Los Desterrados* – those who lost their land, their homes and their community – still lament the betrayal and destruction of the community at the hands of public officials.



Chavez Ravine is buried in a sea of asphalt to provide parking for Dodger Stadium¹⁰²

It would be wrong to relive the duplicity of the past. Public officials cannot betray children who dream of soccer fields. Public officials cannot take the land the people fought for at the Cornfield and Taylor Yard and tell the children to go find some place else to play soccer.

VIII. Equal Access to Parks and Recreation

A. Simple Justice

Simple justice requires playing fields on the Cornfield and Taylor Yard. State Parks must ensure equal justice for people of color and low-income people by providing fields for soccer and other organized sports at the Cornfield and Taylor Yard under state and federal civil rights and environmental justice laws, the common law duty to serve, the public trust doctrine, and the First Amendment. Federal and California state laws prohibit both intentional discrimination and unjustified discriminatory impacts for which there are less discriminatory alternatives by recipients of public funds including State Parks.

HUD Secretary Andrew Cuomo recognized that the principle of equal justice must be implemented in developing the Cornfield. Secretary Cuomo withheld federal funding for the warehouse proposal unless the City of Los Angeles and Majestic Realty conducted a “full-blown” assessment of the impact of the proposed development on communities of color and low-income communities, including the park alternative. Secretary Cuomo acted after members of the Chinatown Yard Alliance filed an administrative complaint claiming the warehouse project was the result of discriminatory land use policies that had long deprived communities of color and low-income communities of parks under federal civil rights, environmental justice, and environmental laws.¹⁰³ State Senator Tom Hayden, one of the authors of Proposition 12, emphasized in a letter to Secretary Cuomo that public funds

should not be used to perpetuate and worsen the longstanding practice in Los Angeles of unlawfully depriving inner city residents of equal access to parks and open space.¹⁰⁴ Secretary Cuomo's action is a precedent for implementing the principle of equal access through the planning process in developing the state parks in the Cornfield and Taylor Yard.

The California Coastal Commission has implemented the principle of equal access to public land in Los Angeles under state environmental justice laws. The Commission approved a land use plan providing that Malibu must maximize access to public beaches while ensuring the fair treatment of people of all races, cultures, and incomes. The Commission acted in response to the recommendations of a diverse alliance led by the Center for Law in the Public Interest.¹⁰⁵ The action of the Coastal Commission is a precedent for implementing the principle of equal access through the planning process in developing the state parks in the Cornfield and Taylor Yard.

The recently-released Latino Policy Agenda for California endorses equal access to parks and recreation as a major environmental quality and environmental justice issue. This is part of a larger vision for distributing environmental benefits and burdens in ways that are equitable, protect human health and the environment, promote economic vitality, and engage full and fair public participation in the decision making process. The Latino Policy Agenda calls on public officials to enforce state and federal civil rights and environmental protections through the planning and administrative process (rather than responding to litigation); to gather, analyze and publish the information necessary for the public to understand the impact of decisions on all communities; and to enable full and fair public participation in the decisions that affect people's lives.¹⁰⁶ These principles apply to developing the state parks in the Cornfield and Taylor Yard.

The fact that low-income people of color disproportionately live in areas without adequate access to parks and recreation is not an accident of unplanned growth, but rather the result of a continuing history and pattern of discriminatory land use planning, restrictive housing covenants, federal mortgage subsidies restricted to racially homogenous neighborhoods, and discriminatory park funding policies and practices in Los Angeles.¹⁰⁷ Furthermore, Southern California historically has not received a reasonable share of the state's parks.¹⁰⁸

B. Civil Rights Standards under Federal and State Laws

State and federal civil rights laws require State Parks to implement equal justice both in the design of and programs for the Cornfield and Taylor Yard. Title VI of the Civil Rights Act of 1964 and its implementing regulations prohibit (1) intentional discrimination based on race, color or national origin, and (2) unjustified discriminatory impacts for which there are less discriminatory alternatives, by applicants for or recipients of federal funds such as State Parks. Title VI provides: "No person in the United States shall on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."¹⁰⁹ The Equal Protection Clause of the Fourteenth Amendment to the United States Constitution further prohibits intentional discrimination. Section 1983 of the Civil Rights Act of 1871 prohibits intentional discrimination and discriminatory impacts.

The regulations that every federal agency has enacted pursuant to Title VI bar criteria or methods of administration by recipients of federal funds that have the effect of subjecting

persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of a program with respect to individuals of a particular race, color, or national origin.

California law prohibits both intentional discrimination and unjustified discriminatory impacts by recipients of state funds, including State Parks, under Government Code Section 11135. In addition, California law defines environmental justice as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies,” under Government Code § 65040.12.¹¹⁰ The mission of State Parks needs to be interpreted in light of these laws and principles.

To receive federal funds, a recipient such as State Parks must certify that its programs and activities comply with Title VI and its regulations.¹¹¹ In furtherance of this obligation, recipients must collect, maintain and provide upon request timely, complete, and accurate compliance information.¹¹²

An important purpose of the laws is to assure that recipients of public funds not maintain policies or practices that result in racial discrimination.

1. Unjustified Discriminatory Impacts

It is necessary to examine three components under the discriminatory impact standard under Title VI regulations, and by analogy, under state law: (1) Whether an action by State Parks would have a discriminatory impact based on race, ethnicity or national origin. (2) If so, State Parks would bear the burden of proving that any such action is justified by business necessity. (3) Even if the action would otherwise be justified, the action is prohibited if there are less discriminatory alternatives to accomplish the same objective.¹¹³

a. Discriminatory Impacts.

State Parks provides fields for soccer, polo, baseball and other organized sports in Will Rogers and Malibu Bluffs State Parks that disproportionately benefit wealthy and white communities. People of color and low-income people in the Cornfield and Taylor Yard communities are equally entitled to the benefits of soccer and other sports: fun; athletics, academics and leadership; better health; an alternative to gangs, crimes, drugs, violence, prostitution, and unwanted pregnancies; cultural identity and a sense of history. Failure to provide playing fields in the Cornfield and Taylor Yard state parks would disproportionately deny them these benefits.¹¹⁴

State parks in the Cornfield and Taylor Yard with passive recreation without playing fields would disproportionately benefit non-Hispanic white people who value parks for passive uses. Failure to provide playing fields would disproportionately deny the benefits of soccer and other sports to Latino and African-American people who value parks for organized sports. There is a genuine need for balanced parks with both active and passive recreation that provide equal access for all.

b. No Business Necessity.

No business necessity would justify denying the benefits of soccer and other sports to communities of color and low income communities in the state parks in the Cornfield and Taylor Yard.

The following is a discussion of various concerns that have recently been raised about playing fields.

Playing fields are inconsistent with the State Parks mission to preserve natural resources. Playing fields squarely fulfill the State Parks mission. Soccer improves human health, inspires players and fans, and educates players through life-long lessons in teamwork, leadership, and self-esteem. Soccer is played on flat open space in harmony with natural settings. Soccer is among the most valued cultural and historical resources for Latino and other immigrant communities. Soccer provides an alternative to gangs, crimes, drugs, violence, prostitution, and unwanted pregnancies. The fields for soccer at Will Rogers and Malibu Bluffs State Parks, for example, are harmonious with the natural settings, the portable goals are put up and taken down in minutes, and the fields are available for other purposes before and after games.

There can be no organized sports on land owned and maintained by State Parks. This is simply wrong. There are fields for soccer, polo, baseball and softball at Will Rogers, Malibu Bluffs and Pfeiffer Big Sur State Parks, and other organized sports at other state parks.

Funds used to purchase state parks cannot be used for organized sports. This claim is not supported by the statutory provisions governing state parks generally or the Cornfield and Taylor Yard specifically, particularly when those provisions are read together with the environmental justice and civil rights provisions cited above.

Park rangers are best suited for stewardship of natural resources and have no expertise in managing a soccer program. Volunteers from Anahuak and other groups can run the program, just as AYSO volunteers do at Will Rogers. The City of Los Angeles has also agreed to operate and maintain the multi-use recreational fields.¹¹⁵

Playing fields exclude others from using the park. A balanced park accommodates different uses by different people at different times. For example, at Will Rogers, children play soccer, their families and friends watch and socialize on the sidelines, and everyone picnics or hikes on neighboring trails or visits the park museum after games. After games, fields are deserted and soccer does not exclude anyone from anything.¹¹⁶ Playing fields will enhance – not prevent – broad, public access to and use of the parks.

The Cornfield should be dedicated to culture and history. A balanced park with playing fields will provide a living testimonial to the culture and history of the people who have played at the Cornfield and Taylor Yard in the past, and who will play there into the future for seven generations and more. It would be a mistake to create a monument to the cultural resources of the past while simultaneously excluding the cultural resources of the present by not including playing fields.

There should be grassy fields for informal sports and occasional pick up games. That is not enough. A balanced park will provide multi-use fields for organized team sports as well.

Organized sports will cause too much wear and tear on grass fields. Professor George Hargreaves from the Harvard University School of Design testified before the Cornfield Advisory Committee that playing fields can be designed and maintained to withstand organized sports.

There should be no flat grassy fields at all, but only groves of trees, native plants, trails and riparian habitat for birding, hiking, jogging and passive recreation. This is precisely the issue. Such a park will serve only the interests of the community that disproportionately values passive recreation. A balanced park will equitably serve the interests of diverse communities.

State Parks should close the playing fields at Will Rogers, Malibu Bluffs and Pfeiffer Big Sur State Parks and not provide playing fields at the Cornfield and Taylor Yard. This would be analogous to cities in the south closing segregated municipal swimming pools rather than providing equal access to the pools.

There is a need for creative solutions to create playing fields. (a) State Parks can provide land swaps for playing fields at the Cornfield and Taylor Yard. The City of Los Angeles can oversee and maintain playing fields in the Cornfield and Taylor Yard. (b) State Parks can provide local assistance for playing fields some place else. The City can provide soccer fields some place else. There is a fine line here. The Cornfield and Taylor Yard are creative solutions for balanced parks with playing fields. Both sites would be warehouses and industrial developments *but for* the urban park movement. The Center for Law in the Public Interest and others remain committed to working creatively with state and local authorities to create parks and playing fields at the Cornfield and Taylor Yard, as well as elsewhere.

Future prospects for playing fields elsewhere are no substitute for playing fields here and now, however. There is no commitment by State Parks or the City or any one else to buy land any place else to play soccer. The City was the main opponent of parks at the Cornfield and Taylor Yard in the first place. Local authorities have not resolved the discriminatory “soccer gap” documented since at least 1987.¹¹⁷ Separate playing fields elsewhere are not equal.

The community triumphed in the struggle for balanced parks with playing fields at Cornfield and Taylor Yard. They cannot now be expected to launch a whole new effort to find some place else for their children to play. The children have waited long enough.

c. Less Discriminatory Alternatives.

Preserving natural and cultural resources, and providing passive recreation, are clearly desirable objectives for state parks in the Cornfield and Taylor Yard. There are less discriminatory alternatives to accomplish these objectives than excluding playing fields. Communities all over the world provide children the basic right to play soccer on fields that are harmonious with natural settings. State Parks does so in Will Rogers, Malibu, and Pfeiffer State Parks. State Parks can do so in the Cornfield and Taylor Yard.

2. Intentional Discrimination

To evaluate an intentional discrimination claim, courts consider the following types of evidence: (1) the impact of the action –whether it bears more heavily on one racial or ethnic group than another; (2) the historical background of the action, particularly if a series of official actions was taken for invidious purposes; (3) any departures from substantive norms, particularly if the factors usually considered important by the decision maker strongly favor a decision contrary to the one reached; (4) any departures from procedural norms; (5)

the decision maker's knowledge of the harm its decision caused and would continue to cause; (6) a pattern or practice of discrimination.¹¹⁸

(1) The discriminatory impacts of excluding playing fields from the Cornfield and Taylor Yard are discussed above.

(2) and (6) There is a continuing history and pattern of intentional discrimination against communities of color and low income communities that has denied them equal access to parks and recreation in Los Angeles, as documented in the administrative complaint submitted to HUD Secretary Andrew Cuomo. In addition, Southern California historically has received less than its share of state park resources.

(3) The substantive factors usually considered important strongly favor balanced parks in the Cornfield and Taylor Yard with large multi-use fields for soccer and other sports that fit harmoniously with the natural settings and the cultural and historical values at stake. One of the broadest and most diverse alliances ever assembled behind any issue in Los Angeles support balanced parks with playing fields including Governor Davis, Speaker Emeritus Antonio Villaraigosa, former State Parks Director Rusty Areis, County Supervisor Gloria Molina, Assemblymember Jackie Goldberg, Assemblymember Gil Cedillo, Senator Richard Polanco, Los Angeles City Councilmembers Ed Reyes and Eric Garcetti, the Catholic Archdiocese of Los Angeles, Nobel Peace Laureate Rigoberta Menchú, the Los Angeles Times, planning reports from State Parks, the Coastal Conservancy, and UCLA, the Olmsted Report, the Chinatown Yard Alliance, the Coalition for a State Park in Taylor Yard, and other community, civil rights, environmental justice, and environmental leaders.

Balanced parks with playing fields in the Cornfield and Taylor Yard will alleviate the desperate need for soccer fields in a region and in neighborhoods that are park-poor. Playing fields in harmony with natural settings squarely fulfill the State Parks mission. Soccer improves human health, inspires players and fans, and educates players. Soccer is among the most valued cultural and historical resources for Latino and other immigrant communities. Soccer provides an alternative to gangs, crimes, drugs, violence, prostitution, and unwanted pregnancies. Soccer is a central part of the social meaning diverse communities give to parks.

(4) Leaving out playing fields would violate procedural norms. Community, elected and civic leaders for years have clearly and consistently highlighted the desperate need for playing fields in the Cornfield and Taylor Yard through the planning process. Not until the November 6, 2002, Interim Use Workshop at Taylor Yard and the November 16, 2002, meeting of the Cornfield Advisory Committee did state officials publicly suggest there would be no playing fields in the state parks.

(5) State Parks officials know the harm that would be caused to low income children of color in the Cornfield and Taylor Yard communities if there are no playing fields – they have had actual notice through years of hearings, letters, community organizing, and through this Report.

C. Equal Access under the Duty to Serve and Public Trust Doctrines

The Department of Parks and Recreation owns and operates parks in the public trust and has a duty to serve all members of the public fairly. The public trust and duty to serve doctrines, dating back to English common law and Roman law, require equal access to playing fields in the Cornfield and Taylor Yard. State Parks provides playing fields in Malibu Bluffs, Will Rogers, and Pfeiffer State Parks and elsewhere. Diverse communities

value and use parks differently. Members of each community are entitled to equal access to the parks.¹¹⁹

D. First Amendment Interests in Parks and Recreation

There is a constitutionally protected First Amendment interest in access to the park, freedom of association, and freedom of expression to play soccer and other organized team sports in the state parks in the Cornfield and Taylor Yard. Refusing to provide playing fields would have an impermissible chilling effect on those First Amendment interests.¹²⁰

IX. Recommendations

State Parks will change the community in the Cornfield and Taylor Yard. The community will also change State Parks. Urban parks are different from wilderness parks. People will not use an urban park just because it is there or because park officials wish they would. Different people use parks differently. A diversity of users will populate and enliven the parks through the day. The parks should attract as many different kinds of people with as many different schedules, interests, and purposes as possible. Even the same person will come for different reasons at different times, sometimes to play soccer, sometimes to picnic, sometimes to walk along a nature trail, sometimes to lie under a tree.¹²¹ There is a demand for playing fields in the Cornfield and Taylor Yard. Playing fields will draw people to the park. Without people, the parks will lie deserted and dangerous. Fields for soccer and other sports will bring the simple joys of playing in the park to the children of the Los Angeles region.

Simple justice mandates the following goals in the Cornfield and Taylor Yard:

- Balanced parks with large multi-use fields that will accommodate soccer and other organized team sports.
- The playing fields will be harmonious with the natural setting and the cultural and historical values at stake at each site.
- State Parks will design and operate balanced parks in ways that are sensitive to and ensure the fair treatment of people of all races, cultures, and incomes.
- State Parks will design and operate balanced parks in ways that are sensitive to the cultural and social meanings of soccer and other sports to the people of diverse races, cultures, and incomes.
- The interim use plans for both Cornfield and Taylor Yard will include large multi-use fields that will accommodate soccer and other organized team sports.
- State Parks will provide local assistance to the City of Los Angeles, other local authorities, and community organizations to find creative solutions to provide fields for soccer and other organized team sports in underserved communities.
- State Parks should express its commitment to achieve these objectives.

Four of the central lessons of the environmental justice movement are that communities of color and low income communities are disproportionately denied the benefits of parks and other public work projects, disproportionately bear the burdens of environmental degradation, do not have the information necessary to understand the impact

of environmental policy decisions on their lives, and are excluded from full and fair participation in the decision making process.

The Cornfield and Taylor Yard offer the opportunity to learn from those lessons in creating state parks. Just as important, the Cornfield and Taylor Yard offer the opportunity to bring people together to define the kind of community where they want to live and raise children.

¹ This Report is submitted by the Center for Law in the Public Interest on behalf of Robert García as a member of the Chinatown Cornfield Advisory Committee, and on behalf of the Anahuak Youth Soccer Association (“Anahuak”) in response to the November 6, 2002, Workshop on the Interim Public Use Project in Taylor Yard. A report on the history of the people of the Cornfield is forthcoming. This Report is made possible in part by the generous support of the Ford Foundation and the Resources Legacy Fund Foundation.

² This Report uses the terms “multi-use fields,” “playing fields,” and “fields for soccer and other organized team sports” interchangeably. “Active recreation” includes soccer and other organized team sports. Informal open spaces for casual “pick-up” games are not enough.

³ Chinatown Yard Alliance mission statement and member organizations, May 22, 2001, Exhibit (“Ex.”) 3; Letter from Chinatown Yard Alliance to Governor Gray Davis Re: Funding to Acquire the Chinatown Cornfield, Apr. 12, 2001, Exhibit 4. Exhibits are on file at the Center for Law in the Public Interest.

⁴ Letter from Center for Law in the Public Interest to California State Coastal Conservancy Re: Create a 101 Acre State Park in Taylor Yard with Active Recreation and Soccer Fields, Mar. 8, 2002, Ex. 41. *Accord*, Letter from Anahuak Youth Soccer Association to California Department of Recreation and Parks Re: Support for Acquisition of Taylor Yard, Nov. 14, 2001, Ex. 39; Letter from Anahuak Youth Soccer Association to Governor Gray Davis, Nov. 26, 2001, Ex. 52; Letter from Anahuak Youth Soccer Association to Resources Secretary Mary Nichols, Nov. 26, 2001, Ex. 53; Letter from Anahuak Youth Soccer Association to California State Coastal Conservancy, Mar. 8, 2002, Ex. 42.

⁵ Olmsted Brothers & Bartholomew and Associates, *Parks, Playgrounds and Beaches for the Los Angeles Region* (1930) (the Olmsted Report).

⁶ Jocelyn Stewart, *Officials Resort to Creativity to Meet Need for Parks*, L.A. Times, June 15, 1998 (based on 1990 census data).

⁷ Source: 2000 United States Census Data, Ex. 55.

⁸ *Id.*

⁹ *Id.*

¹⁰ Mark Baldasare, Public Policy Institute of California Statewide Survey: Special Survey on Californians and the Environment vi (June 2002).

¹¹ *L.A. Times state wide exit poll, March 7, 2002.*

¹² *The Seventh Generation: The Strategic Vision of California State Parks* (2001) (emphasis added).

¹³ To fulfill its mission, State Parks is committed to strategic initiatives to provide additional outdoor recreation opportunities that keep pace with the needs of California's growing, diverse population and changing lifestyles, to become more relevant in the major population centers of the State, and to increase its relevancy for a large portion of the public. *Id.* at 19. Playing fields advance each of these goals.

¹⁴ Cal. Gov. Code § 65040.12.

¹⁵ Press Release, Governor Davis Announces Acquisition of Parklands in Downtown Los Angeles (Dec. 21, 2001), Ex. 2.

¹⁶ Marilu Meza, *Anuncian Compra de Terrenos para Parques*, La Opinion, Dec. 22, 2002.

¹⁷ Ex. 1.

¹⁸ Matea Gold, *State Plans 2 Parks by L.A. River*, L.A. Times, Dec. 22, 2001, Ex. 18.

¹⁹ Marilu Meza, *Anuncian Compra de Terrenos para Parques*, La Opinion, Dec. 22, 2002.

²⁰ Letter from Assembly Speaker Antonio Villaraigosa to Governor Gray Davis, Apr. 12, 2000, Ex. 20; Letter from Antonio Villaraigosa to the Coalition for a State Park at Taylor Yard, Apr. 14, 2001, Ex. 21.

²¹ Rasa Gustaitis, *Los Angeles River Revival*, California Coast & Ocean, Autumn 2001, Ex. 10.

²² *E.g.*, Chinatown Yard Alliance mission statement and member organizations, May 22, 2001, Ex. 3; Letter from Chinatown Yard Alliance to Governor Gray Davis Re: Funding to Acquire the Chinatown Cornfield, Apr. 12, 2001, Ex. 4; Chinatown Yard Conceptual Plan, Mar., 2001, Ex. 5.

²³ Jesus Sanchez, *L.A.'s Cornfield Row: How Activists Prevailed*, L.A. Times, Apr. 17, 2001, Ex. 13.

²⁴ Chinatown Yard Alliance mission statement and member organizations, May 22, 2001, Ex. 3.

²⁵ Coalition for a State Park at Taylor Yard, Taylor Yard Overview, Ex. 6; Taylor Yard State Park Conceptual Plan, Ex. 7.

²⁶ Coalition for a State Park at Taylor Yard, Taylor Yard Overview, Ex. 6.

²⁷ Ex. 9.

²⁸ Letter from Environmental Defense to Governor Gray Davis, Apr. 21, 2000, Ex. 33.

²⁹ Letter from Concerned Citizens of South Central Los Angeles, The Advancement Project, and Center for Law in the Public Interest to Assemblyman Rod Wright and the California Legislative Black Caucus RE: Funding for Acquisition of the Chinatown Cornfield, May 11, 2001, Ex. 32.

³⁰ Letter from United Nations Soccer League to State Parks Office of Acquisition and Real Property Services RE: United Nations Soccer League Support for Acquisition of Taylor Yard, Nov. 14, 2001, Ex. 40.

³¹ Letter from L.A. County Supervisor Gloria Molina to Resources Secretary Mary Nichols, Dec. 18, 2001, Ex. 27.

³² Letter from Assemblymember Gil Cedillo to Assembly Speaker Robert Hertzberg Re: Cornfields Urban Park – Member Request, May 7, 2001, Ex. 23.

³³ Press Release, City Councilmember Ed Reyes, *Reyes Announces Major Step Towards Creation of Park Land in Taylor Tard*, Sep. 13, 2001, Ex. 26.

³⁴ Letter from Assemblymember Jackie Goldberg to Lennar Corp, May 2, 2001, Ex. 22; Letter from State Senate Majority Leader Richard G. Polanco to Lennar Corp., May 18, 2001, Ex. 25; Letter from City Councilmember Eric Garcetti to Lennar Corp., May 23, 2001, Ex. 28.

³⁵ Editorial, *Davis Can Make 'Cornfield' Bloom*, L.A. Times, May 19, 2001, Ex. 12.

³⁶ Editorial, *A Green Explosion*, L.A. Times, July 7, 2001, Ex. 15.

³⁷ James Ricci, *A Park With No Name (Yet) but Plenty of History*, L.A. Times Magazine, July 15, 2001, Ex. 16.

³⁸ Editorial, *No Big Boxes in This Yard*, L.A. Times, June 30, 2001, Ex. 14.

³⁹ Editorial, *A Vision of City Parks*, L.A. Times, Sep. 22, 2001, Ex. 17.

⁴⁰ *Id.*

⁴¹ Letter from Justice and Peace Commission to Secretary Andrew Cuomo, United States Department of Housing and Urban Development, Aug. 28, 2000, Ex. 43; Letter from Justice and Peace Commission Chair Pam Rector to Lennar Corp., July 13, 2001, Ex. 45.

⁴² Letter from Cardinal Roger Mahony to Governor Gray Davis RE: Funding for Acquisition of the Chinatown Cornfield, Apr. 30, 2001, Ex. 44.

⁴³ Robert García, *The Legacy of Rodney King and a Testament of Hope*, 8 American Bar Association Goal IX 6 (2001); Jesus Sanchez, *L.A.'s Cornfield Row: How Activists Prevailed*, L.A. Times, Apr. 17, 2001, Ex. 13. Letter from Chinatown Yard Alliance to Governor Gray Davis Re: Funding to Acquire the Chinatown Cornfield, Apr. 12, 2001, Ex. 4; Letter from Planning and Conservation League to Governor Gray Davis Re: Funding for a State Park in the Chinatown Cornfield, June 19, 2001, Ex. 48; Letter from Planning and Conservation League to Mayor Kenneth Hahn [sic] Re: State Park at Taylor Yard, Sept. 26, 2001, Ex. 49; Letter from Environmental Defense to Governor Gray Davis, Apr. 21, 2000, Ex. 33.

⁴⁵ AYSO Region 69 Referee Schedule showing soccer games on five soccer fields at Will Rogers State Park, Nov. 23, 2002, Ex. 35; Ex. 57A.

⁴⁶ Ex. 57D.

⁴⁷ Ex. 57B.

⁴⁸ Ex. 57C.

⁴⁹ Interview December 7, 2002.

⁵⁰ 2000 United States Census Data.

⁵¹ 2000 United States Census Data.

⁵² Ex. 34.

⁵³ California State Parks, *Pfeiffer Big Sur State Park General Plan*, Oct. 1999. *See, e.g.*, p. 8, 24, 26, 51, and Fig. 3 and Fig. 7.

⁵⁴ Charles Burrell, *State OKs Eastshore Park Blueprint*, San Francisco Chronicle, Dec. 7, 2002.

Research into organized sports at other state parks is currently underway.

⁵⁵ Jose A. Lopez, *Eastshore State Park Blueprint OK'd*, Contra Costa Times, Dec. 7, 2002.

⁵⁶ *Declaration of the Rights of the Child*, Proclaimed by General Assembly resolution 1386(XIV) of 20 November 1959, Principle 7 states:

The child is entitled to receive education... which will promote his general culture and enable him, on a basis of equal opportunity, to develop his abilities, his individual judgement, and his sense of moral and social responsibility, and to become a useful member of society. . . .

The child shall have full opportunity for play and recreation, which should be directed to the same purposes as education; society and the public authorities shall endeavour to promote the enjoyment of this right.

United Nations' Convention on the Right of the Child, General Assembly resolution 44/25 of 20 November 1989, Article 31 states:

1. States/Parties recognize the right of the child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts.

2. States/Parties shall respect and promote the right of the child to participate fully in cultural and artistic life and shall encourage the provision of appropriate and equal opportunities for cultural, artistic, recreational and leisure activity.

⁵⁷ *See* Anastasia Loukaitou-Sederis and Orit Stieglitz, *Children in Los Angeles Parks: A Study of Equity, Quality, and Children Satisfaction with Neighborhood Parks* 1-6 (forthcoming 2002).

⁵⁸ Charles Ornstein and Erika Hayasaki, *26% of Kids Overweight, Study Finds*, L.A. Times, Dec. 12, 2002.

⁵⁹ Editorial, *The Youth Obesity Epidemic*, N.Y. Times, Nov. 29, 2002.

⁶⁰ *Quoted in* Charles Ornstein and Erika Hayasaki, *26% of Kids Overweight, Study Finds*, L.A. Times, Dec. 12, 2002.

⁶¹ *Id.*

⁶² Editorial, *The Youth Obesity Epidemic*, N.Y. Times, Nov. 29, 2002.

⁶³ Charles Ornstein and Erika Hayasaki, *26% of Kids Overweight, Study Finds*, L.A. Times, Dec. 12, 2002.

⁶⁴ Editorial, *The Youth Obesity Epidemic*, N.Y. Times, Nov. 29, 2002.

⁶⁵ *Id.*

⁶⁶ Archives of Pediatrics and Adolescent Medicine, published by the American Medical Association, *cited in Study Links Team Sports and Healthful Behavior*, N.Y. Times, Sept. 15, 2000.

- ⁶⁷ Rebecca Flournoy, *Regional Development and Physical Activity: Issues and Strategies for Promoting Health Equity*, A Policylink Report, Nov. 2002, Ex. 56.
- ⁶⁸ *Gangs, Crime and Violence in Los Angeles: Findings and Proposals from the District Attorney's Office* (1992).
- ⁶⁹ *Id.*
- ⁷⁰ Anastasia Loukaitou-Sideris and Orit Stieglitz, *Children in Los Angeles Parks: A Study of Equity, Quality, and Children Satisfaction with Neighborhood Parks 1-6* (forthcoming 2002).
- ⁷¹ Anastasia Loukaitou-Sideris, *Urban Form and Social Context: Cultural Differentiation in the Uses of Urban Parks*, 14 *Journal of Planning Education and Research*, 89-102 (1995).
- ⁷² *Id.*
- ⁷³ *Id.*
- ⁷⁴ Victor M. Valle & Rodolfo D. Torres, *Latino Metropolis* 158 (2000); accord, Pierrette Hondagneu-Sotelo, *Gendered Transitions: Mexican Experiences of Immigration*, 36 (1994).
- ⁷⁵ Loukaitou-Sideris, *supra*.
- ⁷⁶ *Id.*
- ⁷⁷ See David Johnston, *The Soccer Gap*, L.A. Times, Oct. 11, 1987.
- ⁷⁸ Loukaitou-Sideris, *supra*.
- ⁷⁹ Juan Gonzalez, *Harvest of Empire: A History of Latinos in America* 142, 145 (2000).
- ⁸⁰ Jose Roy García filed *Declaration of Intent to Receive and Solicit Contributions* as a candidate for the Mar. 4, 2003 Primary for L.A. City Council District 6 on Nov. 7, 2002. See Los Angeles City Ethics Commission website at <http://ethics.lacity.org/Index.htm>. See also José Fuentes-Salinas, *El ángel de los niños*, La Opinión, April 29, 2001.
- ⁸¹ Hondagneu-Sotelo, *supra*, at 55.
- ⁸² Letter from Environmental Defense to Governor Gray Davis, Apr. 21, 2000, Ex. 33.
- ⁸³ Pelé, Foreword, in Paul Gardner, *The Simplest Game* xi (1994).
- ⁸⁴ Pelé, *My Life and the Beautiful Game* 343-44 (1977).
- ⁸⁵ Jeannine Gendar, *Grass Games & Moon Races: California Indian Games and Toys* 15 (1995).
- ⁸⁶ *Id.* at 17.
- ⁸⁷ *Id.*
- ⁸⁸ *Id.* at 23.
- ⁸⁹ See *id.* at 20, 23, 25.
- ⁹⁰ Paul Gardner, *The Simplest Game* 1-2 (1994).
- ⁹¹ *Draft Summary Narrative: Cornfields Chinatown Yards Study Area*, prepared for California Department of State Parks by the Dangermond Group, Mar., 2001, Ex. 11.
- ⁹² Letter from Center for Law in the Public Interest to California Department of Recreation and Parks Re: Create a State Park in Taylor Yard, Nov. 14, 2001, Ex. 36; Letter from PLAYS Project (Parks for Los Angeles Youth Soccer) to California Department of Recreation and Parks Re: PLAYS Support for Acquisition of Taylor Yard, Nov. 14, 2001, Ex. 37; Letter from Center for Law in the Public Interest to Governor Gray Davis and Resources Secretary Mary Nichols Re: Soccer Fields at Taylor Yard, Nov. 26, 2001, Ex. 38; Letter from Anahuak Youth Soccer Association to California Department of Recreation and Parks Re: Support for Acquisition of Taylor Yard, Nov. 14, 2001, Ex. 39; Letter from United Nations Soccer League to California Department of Recreation and Parks Re: United Nations Soccer League Support for Acquisition of Taylor Yard, Nov. 14, 2001, Ex. 40.
- ⁹³ Letter from Center for Law in the Public Interest to California State Coastal Conservancy Re: Create a 101 Acre State Park in Taylor Yard with Active Recreation and Soccer Fields, Mar. 8, 2002, Ex. 41; Letter from Anahuak Youth Soccer Association to California State Coastal Conservancy, Mar. 8, 2002, Ex. 42.
- ⁹⁴ Taylor Yard Written Comments, June 20, 2002, Ex. 19.
- ⁹⁵ UCLA Dept. of Urban Planning Student Research Project, *Cornfield of Dreams* 101-02 (2000), Ex. 47.
- ⁹⁶ *Id.* at 98, Ex. 46.
- ⁹⁷ Joe Mazingo, *Plan Would Raze Part of L.A. River's Concrete Bank*, L.A. Times, March 31, 2001.
- ⁹⁸ Olmsted Report at 128-29.
- ⁹⁹ *Id.*
- ¹⁰⁰ Ex. 50.
- ¹⁰¹ See generally Don Normark, *Chavez Ravine, 1949: A Los Angeles Story* 18-21 (1999).

¹⁰² Ex. 59.

Letter from Office of the Secretary, United States Department of Housing and Urban Development, to Los Angeles Deputy Mayor Rocky Delgadillo Re: City of Los Angeles – Section 108 Application – Cornfields B-C-06-0523, Sep. 25, 2000, Ex. 29.

¹⁰⁴ Letter from State Senator Tom Hayden to HUD Secretary Andrew Cuomo, July 18, 2000, Ex. 24.

¹⁰⁵ See The Metro Investment Report, *Civil Rights Attorney García on the Legal Battle to Provide Public Access to California's Beaches* 4 (Nov. 2002); Robert García, *Equal Access to California's Beaches: Strategies from the Urban Park Movement*, Proceedings of the Second National People of Color Environmental Leadership Summit (forthcoming 2002) (available online at www.clipi.org); Seema Mehta, *Land-Use Plan OK'd for Malibu*, L.A. Times, Sept. 14, 2002. The diverse alliance includes the Mexican-American Legal Defense & Education Fund, civil rights attorney Constance L. Rice, Mothers of East L.A. Santa Isabel, the William C. Velazquez Institute, Latino Urban Forum, the Planning and Conservation League, Access for All, and the Sierra Club.

¹⁰⁶ *Latino Policy Agenda for California* (available online at www.clipi.org) 25-27 (2002).

¹⁰⁷ See, e.g., Mike Davis, *City of Quartz* 160-64 (1990); Mike Davis, "How Eden Lost Its Garden," chapter in *Ecology of Fear* (2000).

¹⁰⁸ Letter from Planning and Conservation League to Mayor Kenneth Hahn [sic] Re: State Park at Taylor Yard, Sept. 26, 2001, Ex. 49.

¹⁰⁹ 42 U.S.C. § 2000d.

¹¹⁰ Cal. Gov. Code § 65040.12.

AB 857, signed by Governor Davis on September 29, 2002, establishes planning priorities for State Parks and other agencies to promote equity, strengthen the economy, protect the environment and promote human health. The priorities include in relevant part to promote infill development and equity particularly in underserved areas and to preserve cultural and historical resources, to protect environmental resources including recreation lands such as parks, and to encourage efficient development patterns. A balanced park with playing fields squarely meets these statutory priorities.

¹¹¹ *Guardians Ass'n v. Civil Service Commission*, 463 U.S. 582, 629 (1983) (Justice Marshall, concurring in part and dissenting in part).

¹¹² Cf. Executive Order 12,898 on Environmental Justice (Feb. 11, 1994).

¹¹³ *Larry P. v. Riles*, 793 F.2d 969, 983 (9th Cir. 1984).

¹¹⁴ While state officials suggest there may be statutory support for dedicated baseball fields at Malibu Bluffs State Park, that does not relieve the State and State Parks of providing equal justice to the children of the Cornfield and Taylor Yard.

¹¹⁵ Press Release, Governor Davis Announces Acquisition of Parklands in Downtown Los Angeles (Dec. 21, 2001), Ex. 2.

¹¹⁶ Ex. 57D (photo of AYSO soccer players and their families picnicking in Will Rogers).

¹¹⁷ See David Johnston, *The Soccer Gap*, L.A. Times, Oct. 11, 1987.

¹¹⁸ See *Village of Arlington Heights v. Metropolitan Housing Dev. Corp.*, 429 U.S. 252, 265 (1977); United States Department of Justice, Civil Rights Division, Title VI Legal Manual (Sept. 1998) at 49-53 and authorities cited.

¹¹⁹ See generally Charles M. Haar & Daniel Wm. Fessler, *The Wrong Side of the Tracks* (1986) (common law duty to serve provides separate and independent state law basis for equal justice).

¹²⁰ Cf. *Leydon v. Town of Greenwich*, 257 Conn. 318 (2001) (First Amendment right to public park).

¹²¹ See Anastasia Loukaitou-Sideris, *Urban Form and Social Context: Cultural Differentiation in the Uses of Urban Parks*, 14 Journal of Planning Education and Research, 89-102 (1995); See also Jane Jacobs, *The Death and Life of Great American Cities* 89-11 (1992).

Photo Credits: *Chinatown Cornfield* (cover): Robbie LaBelle. *Governor Davis with children of Anahuak* (cover, p. 6): office of Governor Gray Davis. *Rigoberta Menchú with children of Anahuak* (cover, p. 8): Nicolás García. *Shots at Will Rogers State Park* (pp. 11, 12): Robert García. *Malibu Bluffs State Park* (p. 13): Kenneth Adelman, California Coastal Records Project. *Chavez Ravine eviction* (p. 20): Herald-Examiner Collection, Los Angeles Public Library. *Dodger Stadium* (p. 21): Ralph Morris Collection, Los Angeles Public Library.

**CENTER FOR LAW
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Architecture

Planning

Urban Design

December 18, 2008

Via Email and USPS Delivery

Tina Robinson, Environmental Coordinator
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Re: California State Parks Notice of Preparation
Project Title: Los Angeles State Historic Park Master Development Plan

Dear Ms. Tina Robinson:

As community and business stakeholders in the downtown Los Angeles area, Thomas P. Cox: Architects, Inc. puts forth the recommendation that the EIR address in depth concerns of community connectivity, connection to the River, sustainable design, and implementing a design with maximum benefit to the community.

Regarding community connectivity, TCA is concerned with the impact that the current plan for parking will have. As a general rule, parking lots create barriers. If the parking lot is located along Spring Street, as is currently proposed, the community to the Southeast of the park will become disconnected. We propose finding a solution that places the parking along the preexisting edge of the train tracks adjacent to Broadway. This leads into our second concern of the current plan's lack of connectivity for current and future communities North of Broadway into LASHP. Additional bridges are needed spanning from the Park over Broadway, including a bridge linking into Elysian Park. In order to fund this, we recommend removing the "Fountain Bridge" altogether, as it would be costly and wasteful of resources which could be better focused on bringing the communities *into* rather than *over* the Park.

TCA supports the proposed "L.A. River Demonstration Project" and urges that hydro-connectivity to LASHP be a priority and not a marginalized aspect of the overall design and implementation.

TCA urges that creative sustainable design be implemented in a variety of important ways. First of all, cost benefit analysis should be conducted investigating the possible use of wind turbines and PVC arrays for onsite energy generation. The energy produced

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Irvine, CA 92612

tca-arch.com



LASHP Master Development Plan
Page 2
December 18, 2008

Architecture
Planning
Urban Design

could be used in structures such as the welcome center, café, and ecology center, and in turn, these structures could then present educational displays to the community detailing the sustainable designs used onsite. Secondly, we encourage more environmentally and socially sustainable plant choices throughout the Park; environmentally, in order to conserve water, we encourage the usage of indigenous plant species rather than grass, (with the exception of open fields and areas designated for play); socially, in order to maximize public benefit from trees planted, we recommend planting fruit trees which can provide shade as well as sustenance to people.

Along this note, TCA puts forth that the community would benefit from larger gardening plots filled with edible fruits and vegetables; this would provide both educational and economic benefit to the local community. We are concerned that spaces around the site may be underutilized due to extreme sun exposure. As a solution, we recommend additional shade structures for guests by the "performance stage" and potentially other areas as well.

Thank you for your time and consideration. Feel free to contact us with questions regarding this letter.

Respectfully,

Thomas P. Cox: Architects, Inc.

Nathan White
Staff Designer
NW: ec

LA

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tca-arch.com

Original by e-mail:

The area surrounding this park includes a very industrial area. The rendering show tall buildings and build out like condominiums or mixed use and not manufacturing. There are oil and mineral rights attached to properties in the area.

There are also hazardous conditions at William Mead Housing, and potentially other areas in the vicinity because of the railroad history and possible oil wells.

Methane gas may be an issue.

There is heavy truck traffic in the area. The City of Los Angeles has a wish list in their Cornfield Arroyo Seco Specific Plan to make this a pedestrian area which is highly unlikely.

Economic development and job retention is important in an industrial area surrounded by low income, Federal Community Development Block Grant eligible communities.

Please consider the Repetto Hills in nearby Lincoln Heights and the wildlife corridor movement to the LA River. This is overlooked, yet the hills remain open for migratory birds and wildlife.

Water quality and water supply issues should be coordinated with the Greater Los Angeles County Integrated Regional Water Management Plan IRWMP.

Floodplain management needs consideration.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
100 MAIN STREET, MS # 16
LOS ANGELES, CA 90012-3606
PHONE: (213) 897-6696
FAX: (213) 897-1337



*Flex your power!
Be energy efficient!*

IGR/CEQA No. 081126AL, NOP
Los Angeles state Historic Park
Master Development Plan
Vic. LA-110/PM 24.76
SCH # 2008111064

December 16, 2008

Ms. Tina Robinson
California Department of Parks and Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Dear Ms. Robinson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is a design footprint of the long term vision for the Park General Plan/EIR (SCH # 2003031096)

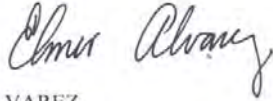
To assist us in our efforts to evaluate the impacts of this project on State Transportation Facilities, please forward a copy of an updated traffic study for our review, if one has been prepared. Otherwise, a new traffic study should be prepared to analyze the following information:

1. Traffic impacts on State Route 110 and all affected on/off-ramps at Stadium Way, and I-5 and on/off-ramps at N. Broadway and Pasadena Ave., and all significantly impacted streets, crossroads and controlling intersections, as well as analysis of existing and future conditions.
2. Traffic volume counts to include anticipated AM and PM peak-hour volumes.
3. Level of service (LOS) before and after development.
4. Future conditions, which include both, project and project plus cumulative traffic generated up to General Plan build out year.
5. A brief traffic discussion showing ingress/egress, turning movements, and a directional flow for project vehicle trips.
6. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including sharing of mitigation costs.

We look forward to reviewing the traffic study. We expect to receive a copy from the State Clearinghouse when the DEIR is completed. However, to expedite the review process, and clarify any misunderstandings, you may send a copy in advance to the undersigned.

If you have any questions, please feel free to contact me at (213) 897-6696 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 081126AL.

Sincerely,

A handwritten signature in cursive script that reads "Elmer Alvarez".

ELMER ALVAREZ
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

December 4, 2008

Tina Robinson
California Department of Parks and Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108



Dear Ms. Robinson:

Re: SCH# 2008111064; Los Angeles State Historic Park Master Development Plan (NOP)

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings.

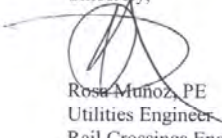
The Commission is in receipt of the *Notice of Completion & Environmental Document Transmittal-Notice of Preparation* for the proposed Los Angeles State Historic Park design concepts to be implemented in phases as funding becomes available. The project description mentions plans for a fountain bridge spanning across the Park allowing access from the neighborhoods atop the adjacent bluff which would traverse over the Los Angeles County Metropolitan Transportation Authority's (LACMTA) Goldline tracks.

If the Department decides to construct a grade separation structure over LACMTA's two mainline tracks, a formal application would be required to be submitted to the Commission for approval. The formal process takes approximately 6-8 months (assuming all parties are in agreement), since the approval document must be reviewed by various staff and meet the requirements of public notice/comment periods.

The Department should arrange a diagnostic meeting with Commission's Rail Crossings Engineering Section and LACMTA to discuss mitigation measures for the affected crossings.

If you have any questions, please contact Jose Pereyra, Utilities Engineer at 213-576-7083, jfp@cpuc.ca.gov, or me at rxm@cpuc.ca.gov, 213-576-7078.

Sincerely,



Rose Muñoz, PE
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection & Safety Division

C: Vijay Khawani, LACMTA

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net



November 20, 2008



Ms. Tina Robinson, Environmental Coordinator
California Department of Parks & Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Re: [SCH#2008111064: CEQA Notice of Preparation \(NOP\), draft Environmental Impact Report \(DEIR\) for a Los Angeles State Historic Park – Master Development Plan, Los Angeles County, California](#)

Dear Ms. Robinson:

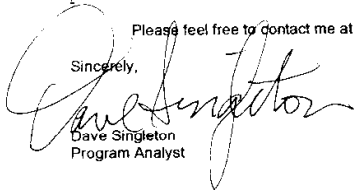
The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 designated to protect California's Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(6)(f) CEQA guidelines) Section 15382 of the 2007 CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

- √ Contact the appropriate California Historic Resources Information Center (CHRIS) for possible 'recorded sites' in locations where the development will or might occur. Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/ <http://www.ohp.parks.ca.gov>. The record search will determine:
 - If a part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded in or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- √ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- √ The Native American Heritage Commission (NAHC) performed:
 - A Sacred Lands File (SLF) search of the project 'area of potential effect (APE)': The results: No known Native American Cultural Resources were identified. However the NAHC SLF is not exhaustive and local tribal contacts should be consulted from the attached list.
 - The NAHC advises the use of Native American Monitors, also, when professional archaeologists or the equivalent are employed by project proponents, in order to ensure proper identification and care given cultural resources that may be discovered. The NAHC, FURTHER, recommends that contact be made with Native American Contacts on the attached list to get their input on potential IMPACT of the project (APE) on cultural resources. In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s) or Native American individuals or elders.
- √ Lack of surface evidence of archeological resources does not preclude their subsurface existence
- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Again, a culturally-affiliated Native American tribe may be the only source of information about a Sacred Site/Native American cultural resource.

- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
- √ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.
 - CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.
 - √ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. . . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.
 - √ Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

Ms. Janielle Jenkins
Governor's Office of Legal Affairs

Ms. Sara Drake, Esq.
Office of California Attorney General

Native American Contacts
Los Angeles County
November 20, 2008

Ti'At Society
Cindi Alvitre
6515 E. Seaside Walk, #C
Long Beach, CA 90803
calvitre@yahoo.com
(714) 504-2468 Cell

Gabrielino

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Tribal Chair/Cultural Resources
P.O. Box 490
Bellflower, CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-925-7989 - fax

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Gabrielino Tongva
tattnlaw@gmail.com
310-570-6567

Gabrielino/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693
San Gabriel, CA 91778
ChiefRBwife@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 Fax

Gabrielino/Tongva Council / Gabrielino Tongva Nation
Sam Dunlap, Tribal Secretary
761 Terminal Street; Bldg 1, 2nd floor
Los Angeles, CA 90021
office @tongvatribes.net
(213) 489-5001 - Office
(909) 262-9351 - cell
(213) 489-5002 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2008111064; CEQA Notice of Preparation (NOP) and draft Environmental Impact Report (DEIR) for the Los Angeles State Historic Park - Master Development Plan; Los Angeles County, California.



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

Notice of Preparation



November 18, 2008

To: Reviewing Agencies
Re: Los Angeles State Historic Park - Master Development Plan
SCH# 2008111064

Attached for your review and comment is the Notice of Preparation (NOP) for the Los Angeles State Historic Park - Master Development Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Tina Robinson
California Department of Parks and Recreation
8885 Rio San Diego Drive
Suite 270
San Diego, CA 92108

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

for: Scott Morgan
Assistant Deputy Director & Senior Planner, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2008111064
Project Title Los Angeles State Historic Park - Master Development Plan
Lead Agency Parks and Recreation, Department of

Type NOP Notice of Preparation
Description The California Department of Parks and Recreation is preparing the Los Angeles State Historic Park (LASHP) Master Development Plan and initiating the environmental review process under the California Environmental Quality Act (CEQA). The Park General Plan/EIR (SCH# 2003031096) was approved by the State Park and Recreation Commission on June 10, 2003. The Master Development Plan synthesizes the General Plan/EIR goals and guidelines into design concepts that will be implemented in phases as funding becomes available. The 32-acre site occupies a critical nexus within the geography and cultural history of Los Angeles.

Lead Agency Contact

Name Tina Robinson
Agency California Department of Parks and Recreation
Phone 619-220-5324 **Fax**
email
Address 8885 Rio San Diego Drive
 Suite 270
City San Diego **State** CA **Zip** 92108

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets North Spring Street and Sotello
Lat / Long
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways
Airports
Railways Metro Gold Line
Waterways Los Angeles River
Schools Ann Street School
Land Use Property was originally zoned industrial but was converted to park use in 2002.

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Noise; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Traffic/Circulation; Water Quality; Growth Inducing; Cumulative Effects

Reviewing Agencies Resources Agency; Office of Historic Preservation; Department of Water Resources; Department of Fish and Game, Region 5; Public Utilities Commission; Native American Heritage Commission; Santa Monica Bay Restoration; California Highway Patrol; Caltrans, District 7; State Water Resources Control Board, Division of Loans and Grants; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

Date Received 11/18/2008 **Start of Review** 11/18/2008 **End of Review** 12/17/2008

Note: Blanks in data fields result from insufficient information provided by lead agency.

