DRAFT
ENVIRONMENTAL IMPACT REPORT
FOR
HISTORIC LANDSCAPE MANAGEMENT PLAN
Will Rogers State Historic Park

Prepared by the Southern Service Center
for the
Topanga Sector of the Angeles District
of the
California Department of Parks and Recreation

January 8, 2003
NOTICE OF AVAILABILITY

Historic Landscape Management Plan & First Phase Restoration Project and Environmental Impact Report for Will Rogers State Historic Park

The California Department of Parks and Recreation has prepared a draft Environmental Impact Report with the intent of adoption for the Historic Landscape Management Plan and First Phase Restoration Project at Will Rogers State Historic Park in Los Angeles County.

Copies of the draft historic landscape management plan and environmental impact report are available for review at the Southern Service Center of the California Department of Parks and Recreation, 8885 Rio San Diego Drive, Suite 270, San Diego, CA 92108 during the hours of 8:00 a.m. to 5:00 p.m. Monday through Friday. Copies are also available for review at the Angeles District Headquarters, 1925 Las Virgenes Road, Calabasas, CA 91302, the Topanga Sector Office, 1501 Will Rogers State Park Road, Pacific Palisades, CA 90272, and the Pacific Palisades Branch of the Los Angeles City Library, 861 Alma Real Drive, Pacific Palisades 90272. Additionally, a limited number of printed documents, or reports on compact disks are available on request for actual cost, or the reports may be reviewed online under the category ‘General Plans’ and sub-category ‘General Plans in Progress’, at the following website: http://www.parks.ca.gov. If there are any questions or concerns, you may call Patricia Autrey, Environmental Coordinator, at (619) 220-5300.

A review period, during which the California Department of Parks and Recreation will receive comments upon the proposed draft Historic Landscape Management Plan/Environmental Impact Report, commences on January 13, 2003. The deadline for receiving written comments regarding the adequacy of the draft Interim Management Plan/Environmental Impact Report is February 26, 2003. Written comments may be mailed to The Southern Service Center, 8885 Rio San Diego Drive, Suite 270, San Diego, CA 92108, or faxed to (619) 220-5400. These comments must be postmarked by February 26, 2003.

This notice was published in the Palisadian-Post and the Malibu Times on January 16, 2003, and distributed on those dates.
EXECUTIVE SUMMARY

The California Department of Parks and Recreation (DPR or Department) has developed the *Historic Landscape Management Plan (HLMP)* as the guiding document for implementation of historic preservation and site planning efforts at Will Rogers State Historic Park (WRSHP) in Los Angeles County. Will Rogers State Historic Park is the site of the ranch and home of one of the most significant Americans of the early twentieth century—Will Rogers. As such, the Will Rogers Ranch Home is listed on the National Register of Historic Places.

The State Park Commission adopted the WRSHP Park in March 1992. The General Plan directed the department to preserve, interpret, and make accessible the Will Rogers Ranch, its associated collections, historic structures, and overall historic landscape for the public’s enjoyment and appreciation. It also declared that the primary purpose of the park was to serve as a memorial to this internationally significant American, and to perpetuate the uses, values, and “sense of place” that he created at his Santa Monica Mountains ranch home.

The *Historic Landscape Management Plan* therefore provides the latest scholarship and updated planning direction for the preservation of significant cultural and natural features, operational uses, and continued public access at WRSHP. This *HLMP* is the result of several years of intensive research, study, and public input. The resulting plan provides DPR management with a proactive guide to support the Department’s Mission, its internal and legal resource management directives, and its declared purpose for Will Rogers SHP.

This document, the Draft Environmental Impact Report, is a separate companion document to the *Historic Landscape Management Plan*. This Draft Environmental Impact Report (DEIR) is being prepared to provide full public disclosure of the Department’s management intent for the planning and implementation of historic property treatments and appropriate uses proposed to preserve this National Register property. The *HLMP* reflects and supplements the intent and goals of the General Plan while more thoroughly directing implementation of mandated preservation treatments and standards, and new park facilities.

The Draft *HLMP* recommends and directs actions for numerous projects and undertakings that allow the Department to effectively protect historic resources in the Will Rogers State Historic Park in the short-term while providing definitive guidelines for planning further implementation projects. The Draft *HLMP* and DEIR also incorporate the first phase of funded implementation projects directed in the Plan. These include restoration of historic ornamental vegetation, stabilization of the historic hay barn structure, aesthetic restoration of the historic stable, restoration of a historic rock wall between the Ranch and Guest Houses, and implementation of the first phase of the Master Drainage Plan.
The DEIR addresses the proposed project and a range of project alternatives that were considered during the planning process in Section 2. The environmental effects of the proposed project are addressed in Sections 5.2 to 5.5 and the Environmental Alternatives Analysis is addressed in Section 5.6 and includes the No Project Alternative and Environmentally Superior Alternatives to the proposed project. The No Project Alternative would leave the Will Rogers SHP historic resources in a continuing state of deferred maintenance. Further, both the No Project Alternative and the Environmentally Superior Alternatives do not provide optimal public use or historic preservation and interpretation of Will Rogers SHP. Full implementation of the recommendations in the *Historic Landscape Management Plan* and the immediate accomplishment of the Phase I priority tasks was found to be the only responsible course of action to protect the cultural and natural resources, implement the general plan, and to comply with the spirit of the grant deed.

The *HLMP* actions may have the potential for significant adverse effects in the areas of historic resources, noise levels, public hazards, water quality, traffic, and air quality. However, the treatments and mitigation measures included throughout the plan are feasible and sufficient to avoid or reduce potential adverse effects to a level below significance. Additionally, the *HLMP* will produce minor or temporary impacts that are less than significant in the areas of aesthetics, public services, recreation, land use, biology, and archaeology. The project will not adversely affect cultural resources, agriculture, energy and mineral resources, agriculture, utilities, local plans, or employment, and will have beneficial long term effects in aesthetics, noise abatement, lighting decrease, recreation, effects, traffic circulation within the park, interpretation and public access to historic structures and equestrian activities.

In summary, the projects proposed herein do not pose adverse long-term significant impacts on the environment. Implementation of the projects under the *HLMP* will not result in unmitigable significant impacts. In reference to the most significant resource of the park, and focus of this plan--the Will Rogers Ranch Historic Landscape District--all work will be done in a manner that complies with the *Secretary of the Interior Standards for the Treatment of Historic Properties* (Weeks and Grimmer 1995) and *Cultural Landscapes* (Birnbaum and Peters 1996). This will assure that best management practices for historical resources are implemented.
# TABLE OF CONTENTS

EXECUTIVE SUMMARY.............................................................................................................. I

1 PURPOSE & NEED.................................................................................................................. 1
  1.1 INTRODUCTION .................................................................................................................. 1
      1.1.1 Consistency with Mission ......................................................................................... 1
      1.1.2 Lead Agency ............................................................................................................ 2
      1.1.3 Project Background ................................................................................................. 2
  1.2 PROJECT NEED .................................................................................................................. 4
  1.3 IDENTIFIED PUBLIC CONCERNS ................................................................................... 5

2 PROJECT DESCRIPTION ........................................................................................................ 9
  2.1 PROPOSED PROJECT..................................................................................................... 9
      2.1.1 Historic Landscape Management Plan Summary .................................................. 10
      2.1.2 Phase 1 Projects .................................................................................................. 14
      2.1.3 Future Phases/Projects ......................................................................................... 16
  2.2 CONSTRUCTION MANAGEMENT .................................................................................. 17
  2.3 PROJECT ALTERNATIVES CONSIDERED..................................................................... 18
      2.3.1 Add Historic Plantings and Irrigation Only ......................................................... 18
      2.3.2 Provide Historic Plantings, Irrigation And Drainage Only ............................. 18
      2.3.3 Build Visitor Center in Location Recommended by General Plan ............... 19
      2.3.4 Build Maintenance Complex Where Recommended by General Plan .. 19
      2.3.5 Retain Polo Practice Arena .................................................................................. 19
      2.3.6 Equestrian Boarding in Bone Canyon .............................................................. 19
      2.3.7 Eliminate All Non-historic Uses .......................................................................... 20
      2.3.8 Eliminate All Equestrian Use of the Facilities ................................................. 20
      2.3.9 Do Not Provide ADA Access ............................................................................ 20

3 ENVIRONMENTAL SETTING ............................................................................................... 33
  3.1 LOCATION AND DESCRIPTION .................................................................................... 33
  3.2 COMMUNITY, LAND USE AND PLANNING ............................................................... 33
  3.3 HISTORIC BACKGROUND & RESOURCE DESCRIPTION ........................................ 34
      3.3.1 Historic Sites, Structures and Landscape Features ............................................ 36
  3.4 ETHNOGRAPHY & ARCHAEOLOGY ......................................................................... 45
  3.5 LANDFORM AND GEOLOGY ..................................................................................... 45
      3.5.1 Topography: ......................................................................................................... 46
      3.5.2 Geology: ............................................................................................................. 46
      3.5.3 Soils: .................................................................................................................... 47
  3.6 HYDROLOGY ................................................................................................................ 48
  3.7 BIOLOGICAL RESOURCES ....................................................................................... 49
      3.7.1 Plant Life ............................................................................................................. 49
      3.7.2 Animal Life ......................................................................................................... 51
  3.8 AIR QUALITY .............................................................................................................. 52
  3.9 TRAFFIC CIRCULATION ............................................................................................. 52

4 KNOWN CONTROVERSIES .................................................................................................. 55

5 ENVIRONMENTAL EFFECTS & MITIGATION .............................................................. 59
  5.1 POTENTIALLY SIGNIFICANT EFFECTS/PROPOSED STATEMENT OF OVERRIDING CONSIDERATIONS ... 59
  5.2 LESS THAN POTENTIALLY SIGNIFICANT IMPACTS WITH PROPOSED MITIGATION 59
      5.2.1 Historic Resources .............................................................................................. 59
      5.2.2 Geology and Erosion ......................................................................................... 61
      5.2.3 Hazardous Materials ......................................................................................... 61
      5.2.4 Noise .................................................................................................................. 63
      5.2.5 Hydrology/Water Quality ................................................................................... 64
      5.2.6 Traffic ............................................................................................................... 65
      5.2.7 Air Quality ......................................................................................................... 67

iii
1 PURPOSE & NEED

1.1 INTRODUCTION

The purpose of the Draft Environmental Impact Report is to provide public agencies and the public in general with detailed information about the effect which the Will Rogers State Historic Park’s *Historic Landscape Management Plan (HLMP)* is likely to have on the environment; to list ways in which any potential significant effects of the *HLMP* might be reduced to a level below significance; and to indicate alternatives to the plan. Portions of the Will Rogers *HLMP*, the companion document, will be summarized or referenced in this Draft Environmental Impact Report (DEIR). The California Department of Parks and Recreation (State Parks) is the Lead Agency for this project. This DEIR has been prepared for the Will Rogers State Historic Park’s *HLMP*, which determines State Parks ultimate guidelines for preserving the park’s National Register historic landscape district’s integrity while providing public access to the grounds and structures. The development of the *HLMP* has been conducted with public participation through a series of scoping meetings and public workshops and continues in this California Environmental Quality Act (CEQA) compliance process. The *HLMP* is consistent with the existing 1992 Will Rogers State Historic General Plan, and does not require a General Plan Amendment.

This DEIR will also address the implementation of the *Historic Landscape Management Plan*. Implementation of the *HLMP* will occur in phases; the first phase is funded through Proposition 40 for $2 million. Detail required for implementation but not included in the *HLMP* will be addressed in the project description within this DEIR. Subsequent phases will be implemented as funding becomes available and will adhere to the constraints, treatments, and mitigation requirements established in the *HLMP* and this DEIR, or will be subject to additional CEQA compliance.

1.1.1 Consistency with Mission

The project is consistent with the Declaration of Purpose statement for Will Rogers State Historic Park and the DPR’s Mission Statement.

“The Department shall preserve and interpret the Will Rogers home, its collections, related historic structures, and the historic landscapes in the park, and shall endeavor to make these areas accessible to the public for its enjoyment and appreciation. The primary purpose of Will Rogers State Historic Park (SHP) is as a nationally significant memorial to Will Rogers, and for perpetuation of the uses and values he sought to create at his home above the city in the Santa Monica Mountains.”

The department shall preserve, manage, and restore natural areas in the park for their intrinsic natural and scenic values, and to complement the historic landscape, both of which were important to Will Rogers. The department shall endeavor to provide historically accurate recreation opportunities appropriate to this historic park, emphasizing those activities that were historically important on the ranch, such as roping, polo playing, and horsemanship, and others that are ancillary to historic interpretation, such as picnicking, tennis and hiking. Through interpretive tours, publications, exhibits, facilities, concessions and special events, the department shall promote an understanding of Will Rogers’ contribution to American history, folklife, and the national character.

“The mission of the California Department of Parks and Recreation is to provide for the health, inspiration, and education of the people of California by helping to preserve the state’s extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation.”

This project furthers the Department’s mission by contributing to the following objectives:

- **Significant cultural sites, features, and structures are protected and preserved.**
- **Provide and maintain an infrastructure.**
- **Provide a safe environment within State Parks.**
- **Improve the quality of life in California through the provision of diverse, high quality recreation experiences and opportunities.**

### 1.1.2 Lead Agency

The Department of Parks and Recreation (DPR) is the Lead Agency for the Historic Landscape Management Plan and first phase restoration project and the Environmental Impact Report. The State Historic Preservation Office (SHPO) may be considered a trustee agency in the project due to a Memorandum of Understanding between DPR and SHPO in relation to Public Resources Code 5024 and 5024.5.

### 1.1.3 Project Background

The State received title to the property that comprises Will Rogers State Historic Park on June 8, 1944 via a behest from Betty Rogers, widow of Will Rogers, which set forth several conditions attached to the gift deed. The property must be used exclusively as a public park named for and dedicated to the memory of the late Will Rogers, and “maintained and improved...as a place of public recreation
in a manner not inconsistent with its maintenance as a memorial and historical monument..." Will Rogers Ranch Home is listed on the National Register of Historic Places, is a historic landscape district resource, and is significant as the home of a person of historical importance for both California and the nation. For more than half a century, the park has provided the public with trails, vistas, grassy surfaces, and historic ranch-related structures and landscape features nestled within Southern California's Santa Monica Mountains.

Between 1944 and 1955, DPR carried out initial park development projects, including building a new entrance road, and developing parking lots and restrooms. Operational adaptations occurred at some of the structures to accommodate maintenance, staff housing, and interpretive needs. Between approximately 1955 and 1975, DPR implemented the first vegetative restoration in the park by planting selected flowers and trees, generally regardless of historic precedent.

The years from 1965 through 1974 saw the expansion of equestrian use in the park, with development on Sarah’s Point and in Mitt, Heart and several feeder canyons. Since 1968, contracts with various concessionaires or cooperative associations were let for the operation of equestrian activities within Will Rogers SHP, including trail rides, exhibition polo games, horse shows and riding classes; these concession activities were terminated in November 2002, due in part to environmental concerns from the impacts of the number of horses, and the appropriateness of private horse boarding in relation to the interpretive programming and purpose of the Park. The State now manages equestrian activities in the unit.

Several other activities not associated with the Park’s role as a memorial to Will Rogers have also occurred over the years. For the past 22 years, soccer has been played on the polo field on Saturday mornings during the fall and winter months, and in the past there was a tremendous demand by local groups to utilize the polo field for such diverse activities as picnics, baseball and softball games, weddings, school meets, tournaments, etc. The General Plan called for the phasing out of such non-Will Rogers-related interpretive activities and this plan is supportive of that direction.

Between the years of 1974 and 1992 little development occurred and a backlog of deferred maintenance accumulated. At the same time concern for the historic character and original purpose of the park began to gain momentum. The Ranch, listed on the National Register of Historic Places in 1971, however continued to hold its historical integrity. Historic American Buildings Survey (HABS) recordation of several buildings was completed in 1988. According to the 1992 General Plan, “Its buildings and grounds have remarkable historical integrity.” The “historic landscape” at the Park includes these buildings and grounds that together create the ranch environment that was designed by Will Rogers himself. In recognizing the historical integrity and significance of the ranch’s historic landscape features, the General Plan also identified several priorities for the management of these cultural resources.
Since early 2000, as a result of concerns raised by DPR technical staff, members of the public, and the Rogers family, the Department carried out intensive investigations of resource and management issues at Will Rogers SHP, including historic structures reports and investigations prepared by outside contractors, an Audit Report of the one-year lease of the Equestrian Center conducted by DPR Audits Section, a Resource & Management Issues Report compiled under the direction of the Department Preservation Officer, a review of Natural Resource Management Issues conducted by the Angeles District Resource Ecologist, a Drainage Master Plan prepared by an outside contractor, an interpretive strategy study prepared by an outside contractor, and a Geotechnical Investigation Report prepared by outside consultants. These studies documented continuing environmental damage, deferred maintenance, and pressures that directed staff away from the park purpose; and as such identified and prioritized the need for the completion of the HLMP.

1.2 PROJECT NEED

The impact of years of heavy use and deferred maintenance on the cultural resources at Will Rogers has been detrimental, resulting in critical infrastructure deficiencies. Contributing cultural landscape elements and features of the National Register property, such as original plantings, have been removed and damaged, stone culverts have ceased to function properly, and historic ranch structures have been poorly adapted and/or have deteriorated. Therefore, a historic landscape management plan has been developed for the park, providing a comprehensive study of the unique cultural resources that comprise the Will Rogers Ranch National Register district. Threats to water quality from poor drainage systems, and lost or damaged historic fabric are among the deficiencies in this infrastructure that will continue to worsen if maintenance, repairs and restoration are not undertaken.

Critical infrastructure improvement outlined in this project for existing deficiencies, include such actions as: restoring historic fencing; reconstructing and restoring rock-lined ditches and walls; and restoring the hay barn, guest house, and lath house, etc. Therefore this document will address priorities from both the General Plan and the draft Historic Landscape Management Plan.

The 2000 Bond Act (Proposition 40) currently makes $2 million available for improvements at Will Rogers SHP. Additionally, $2 million is allocated from the Deferred Maintenance monies. This project is proposed for funding from the general-purpose monies made available by Public Resources Code Section 5096.310(a).
1.3 IDENTIFIED PUBLIC CONCERNS

Will Rogers State Historic Park, as a public park, belongs to the people of California. Through personal contact with Department personnel, correspondence, public meetings and the local media, many diverse public interests have indicated strong concerns about the future use of Will Rogers SHP. The department’s Mission is challenged by the need to comply with the provisions of the grant deed, to preserve the natural and historical resources present in park, and to provide the people of California with the exceptional educational and recreational opportunities at the site.

Issues identified by the public include: equestrian concession rental and/or boarding, organized sporting activities, including soccer, and mountain bike use on trails that also serve horses and hikers. Refer to Section 4 “Known Controversies” for a more detailed analysis.
Go to Master Site Plan.pdf for FIGURE 1.3
2 PROJECT DESCRIPTION

2.1 PROPOSED PROJECT

The Department of Parks and Recreation (DPR) proposes to address critical infrastructure and resource management deficiencies at Will Rogers SHP through the completion and implementation of a comprehensive management plan for the National Register of Historic Places “Will Rogers Historic Landscape District” property. This plan (and its subsequent project actions) will provide for the long-term identification, evaluation, and treatment of the historic landscape structures, features, and elements at Will Rogers SHP. The management plan is the culmination of a multi-year study involving a diverse array of professional state park and cultural resource specialists, park users, and community members. The plan includes treatment and implementation recommendations for the preservation, restoration, rehabilitation, and reconstruction of the Historic Landscape District structures, features, and elements. It also includes various other studies including those for overall park operations, site drainage, fire management, and interpretive programming. The Master Site Plan thus divides the park into 10 management areas: #1-Ranch House, #2-Stable, #3-Historic Ranch Work Area, #4-Polo Field, #5-Sarah’s Point, #6-Upper Pastures, #7-Park Administrative Areas, #8-Historic Entrance & Gate House, #9-Natural Slope Area, and #10-Cherimoya Grove (Figure 1.3).

Funding is also available for immediate implementation of several recommended plan actions, including:

- Replanting of historic ornamental vegetation in Management Plan Areas 1, 2, & 3
- Stabilization of the historic Hay Barn structure.
- Phase I “aesthetic” restoration for the historic Stable.
- Cosmetic restoration of the historic Guest House.
- Restoration of a historic rock wall between the Ranch and Guest Houses.
- Implementation of the first phase of the Master Drainage Plan.

State Park’s Mission includes the protection of natural and cultural resources; therefore, the most effective and appropriate combination of resource impact avoidance, mitigation, and monitoring will be employed throughout the project design, construction, and operations.

The preferred alternative is for the implementation of the Historic Landscape Management Plan and immediate start of its first phase priority projects. This includes the implementation of the comprehensive plan for the preservation, restoration, and enhancement of the Will Rogers Ranch National Register historic landscape resource. The implementation of the projects and maintenance programs in the plan will restore and thus enhance the historic integrity of this National Register property. Plan actions and programs call for the removal of incompatible uses and non-contributing structures and features in an
effort to improve the physical integrity and enhance the historic character of the Will Rogers Ranch. The improved condition and integrity of the historic landscape at the park will provide visitors with an improved experience that will increase their appreciation and understanding of the significance of Will Rogers. In addition, the proposed maintenance guidelines will provide for the establishment of improved, regular maintenance that should reduce the continued establishment of deferred maintenance. The Phase 1 projects will address the immediate need to repair and restore the horse barn (also referred to as the stables) and other historic landscape features including structures, fences, stonework, and plantings, in addition to improving irrigation and drainage.

2.1.1 Historic Landscape Management Plan Summary

The *Historic Landscape Management Plan* addresses the landscape’s historic period, its existing conditions, appropriate treatments and corrective measures, and regular and ongoing horticultural management and maintenance programs for the 10 management areas listed in 2.1 and shown on figure 1.3. A summary of the key proposed project activities is listed below. Please refer to the companion *HLMP* for more specific details and mappings.

2.1.1.1 Conservation Plan for Management Area #1 (Ranch House)

- Restoration of tennis court
- Restoration of the exterior features of the garage/guest house including recontour/replanting of the slope and removal of any non-historic rockwork, refurbishing of the interior to reflect the structure in the 1940’s, the installation of an accessible restroom/lift, and relocation of the existing restroom
- Removal of non-historic masonry materials and drinking fountain in Area #1, and reconstruction of a modified version of the historic rock pathway behind the garage/house as part of the access network
- Repair of the rock wall facing
- Restoration of vegetation beds configurations and the replanting of the beds with historic native and ornamental vegetation
- Repair of porch and patio paving, and the installation of a reinforced slab (if feasible), repair of patio overhead, stairways and other wood exteriors, the furnishing of patio with period reproductions, and the modification of existing drainage patterns at the patio area to protect the house and laundry room
- Rehabilitation of the lath house, including restoration of the incinerator and removal of the non-historic lattice/planter
- Repair of the laundry room exterior
- Removal of the existing parking lot, reconfiguration of the slope and bench (flat area below slope), installation of turf paving on the bench area for event parking, and reconstruction of the historic drive approach
- Removal of the existing asphalt concrete surfacing on the ranch road and restoration of the original location, grade and rustic surface and features,
including the installation of cattle guards, and the planting of eucalyptus to flush out the historic tree line

- Upgrade of the lawn/landscape irrigation system, reconstruction of the historic golf greens/sand trap, and the planting of pepper and acacia trees to flush out the historic tree line
- Reconstruction of the historic path layout at south end of ranch house, the modification of pathways to accommodate transports and an increase accessibility, and construction of a ramp and elevated boardwalk from the visitor center/parking lot
- Development of full accessibility at the utility corridor for interpretive purposes (Refer to Figure 2.1 for illustration)

2.1.1.2 Conservation Plan for Management Area #2 (Stable Area)

- Restoration of the original grade and rustic character of ranch roads and circulation features
- Restore historic grade for features such as riding arena
- Repair of the historic rock drainage channel
- Construction of a compatibly-designed French drain and/or v-ditch behind stable area, replacement of the existing sewer lateral from stable area, and connection of stable roof down-drains and outfall to the new storm drain
- Reconstruction of the riding ring, including turf, track and fencing
- Reconstruction/relocation of the polo cage
- Restoration of original rock retaining-walls
- Repair/reconstruction of historic fencing and gates
- Replacement of missing eucalyptus trees, replanting of the pittosporum hedgerow, and the replanting of historic native and ornamental vegetation in the stable yard, including vine ladders
  (Refer to Figure 2.2 for illustration)

2.1.1.3 Conservation Plan for Management Area #3 (Ranch Work Area)

- Restoration of the original grade and rustic character of ranch roads and circulation features
- Restoration of original grade to access historic Bone Canyon road
- Removal of the polo cage for relocation to Area#2, and the removal of non-historic items within Area #3
- Reconstruction of old stable and historic corral/barnyard area
- Reconstruction of original tree and fence line
- Reconstruction of rock-lined drainage swale down center of Bone Canyon road
- Diversion of outfall from gabion wall around former concession corral area
- Construction of new compatibly-designed storm drain and runoff interception facilities
- Replacement of existing sewer lateral servicing historic foreman’s quarters
• Construction of compatibly-designed French drain behind hay barn
• Construction of compatibly-designed French drain and v-ditch behind foreman’s quarters
• Stabilization of hay barn, installation of public restroom and elimination of current operational use
• Elimination of contemporary structures
(Refer to Figure 2.3 for illustration)

2.1.1.4 Conservation Plan for Management Area #4 (Polo Field)
• Preservation of polo field’s historic layout/grading pattern
• Recover or reconstruction of original stone drainage ditches
• Removal of existing non-historic storm drain at NE corner of polo field, extension of existing historic rock-lined channel at NE corner of polo field, reconstruction of historic berm along east side of polo field, and reconstruction of historic rock-lined channel along east, west and south sides of polo field
• Restoration of the original grade and rustic character of road and circulation features within Area #4
• Removal of non-historic structures or features
(Refer to Figure 2.4 for illustration)

2.1.1.5 Conservation Plan for Management Area #5 (Sarah’s Point)
• Rehabilitation of historic entrance road
• Removal of practice polo arena, show ring, pre-fabricated metal barn, and other non-historic structures
• Construction of accessible restrooms near parking area
• Development of picnic areas
• Development of parking, and overflow parking areas that includes staging areas for equestrian vehicles, buses, and general parking, keeping areas dirt or grass paved and informal where feasible. This would include regrading the Polo Practice Arena to act as a water quality detention basin as needed and an overflow parking area when the site is dry. There will be approximately 300 parking spaces.
• Establishment of tram/shuttle pick-up areas
• Integration of drainage and biofiltration systems for parking areas, equestrian use areas, and upstream drainage waters into the area, while creating minimal visual impact.
(Refer to Figure 2.5 for illustration)
2.1.1.6 Conservation Plan for Management Area #6 (Upper Pastures)

- Removal of paved roadway and riding ring in Bone Canyon and pipe corrals/related features in Bone, Heart and Mitt Canyons
- Relocation of polo cage in Heart Canyon to stable area
- Recontour of canyon floors where needed and restoration of natural vegetation/tree line in Heart, Bone and Mitt Canyons
- Addition or reconstruction of biofiltration swale through all canyons
- Restoration of historic pastures overall
- Reconstruction of historic fencing
(Refer to Figure 2.6 for illustration)

2.1.1.7 Conservation Plan for Management Area #7 (Park Administrative Areas)

- Construction of new visitor center, which would include space for park administration, archives, curatorial, and park volunteers
- Modification of existing parking lot to accommodate visitor vehicles, bus drop-off, accessible parking and shuttle staging
- Improvement of existing drainage patterns
- Reconstruction of road and circulation accesses from new visitor center site to ranch house and garage
- Upgrade of utilities as necessary
- Contour of lower hollow area to accommodate 10,000sf maintenance yard
- Construction of an up to 2500sf maintenance structure for storage and technical services operations in lower hollow
- Development of isolated, approximately 15’x25’ haz-mat storage structure
- Modification of service road to accommodate service vehicles and two way traffic
- Instillation of a filtration system
- Construction of an underground storm drain main
- Adaptation of current park residence area to include Sector administrative functions
- Improvement of current Entrance Road
- Relocation of Josepho Barn from Rustic Canyon for adaptive, multi-use purposes
- Utilization of vegetation for screening, erosion control and rehabilitation
(Refer to Figure 2.7 for illustration)

2.1.1.8 Conservation Plan for Management Area #8 (Historic Entrance and Gatehouse)

- Restoration of original road widths, grades and surfacing, with modifications to accommodate emergency vehicles
- Restoration of existing historic rock-lined ditches to functional use
- Construction of downdrains from Sarah’s Point with outfall energy dissipating devices
- Construction of signalized intersection of historic entrance road with Sunset Boulevard
- Installation of electronic ‘Park Full’ signs in advance of both Park entrances
- Compatibly-designed widening of several curves on historic entrance road to accommodate buses and trailers, if feasible within historic setting
- Replacement of existing culverts with resized culverts on historic entrance road for long-term maintenance and preservation
- Reconstruction of historic entrance gateposts, picket fences at gatehouse/garage, and historic pathways, culverts, footbridges and walkways
- Replanting of eucalyptus trees and appropriate vegetation
- Removal of non-historic fencing and landscape features around gatehouse
  (Refer to Figure 2.8 for illustration)

2.1.1.9 Conservation Plan for Management Area #9 (Natural Slope Area)
- Replacement of selected existing drop inlets and culverts with resized inlets and culverts
- Construction of downdrains with outfall energy dissipating devices at each culvert
- Restoration of existing historic rock-lined ditches to functional use to reduce erosion of slope areas
- Use of native vegetation to control erosion/mudslides
  (Refer to Figure 2.9 for illustration)

2.1.1.10 Conservation Plan for Management Area #10 (Cherimoya Grove)
- Restoration of historic Cherimoya Grove, replacing missing orchard trees with trees propagated from parent stock
- Update of irrigation system
- Replacement of missing Italian cypress trees along roadway with stock propagated from original plant material
  (Refer to Figure 2.10 for illustration)

2.1.2 Phase 1 Projects
Phase 1 implementation primary project scope is identified below. All projects will be designed and implemented to meet the Secretary of the Interior’s Standards for Historic Properties and Cultural Landscapes.
2.1.2.1 Restoration of the Historic Carpenter/Blacksmith Shop

- Restoration of structure to approximate the condition that existed when Will Rogers and his staff used the building
- Shoring of unsupported beams and provide adequate support to mitigate further movement
- Replacement of existing rolled roofing
- Replacement of decayed sheathing boards with like kind materials
- Regrade of areas to slope water away from the structure
- Repair and repoint of rubble stone retaining wall along eastern portion of the building
- Painting of the building following the completion of all repairs

2.1.2.2 Cosmetic Restoration of Guest House/ Garage

- Regrade of the north side of the building slope to direct the water away from the building
- Replacement of the flush solid core doors at ground level
- Repair or replacement of select decayed wood areas
- Repainting of the building exterior in conformance with historic documentation

2.1.2.3 Stabilization of the Historic Hay Barn

- Shoring of roof structure in all areas that are sagging or where supports are moved or have failed
- Implementation of structural repairs of deteriorated lumber, especially deflected beams, plates and posts
- Shoring of retaining walls that are showing signs of failure

2.1.2.4 Aesthetic Restoration of Historic Stable

- Repair of damaged wood elements in the stalls
- Thorough cleaning and repainting of all areas after repairs have been completed
- Regrade of areas to divert water into the drainage system
- Repair and replacement of gutters and downspouts, diverting flow into the drainage system

2.1.2.5 Replant Historic Ornamental Vegetation in Areas 1, 2 & 3

- Implementation of replanting and/or restoration of the historic ornamental vegetation, using existing historical research
- Removal of vegetation that is in conflict with the historic period plan
• Replanting of vegetation that was once part of the original landscape but was removed over time
   Note: Vegetation that exists and is not in conflict with the historic period plan will remain in place.

2.1.2.6 Restore Historic Rock Wall between Ranch & Guest House

• Temporary removal of the existing rock wall, located at the west end of the Ranch House, stabilization of the slope, and replacement of the rock surfacing and slope topography
   Note: The removal of the wall will involve the mapping and recordation of each of the rock elements, so as to retain the historic design and materials.

2.1.2.7 Implement First Phase of Master Drainage Plan

• Addressing the problems of excessive runoff from Bone, Mitt and Heart Canyons; overtopping of the rock-lined channel behind the ranch house; water damage to the laundry room; the moisture threat to the main ranch house, stables and other structures in Bone Canyon; and flooding of the polo field by:
  ▪ Construction of approximately 3,000 LF of new storm drain main line
  ▪ Construction of approximately 800 LF of new storm drain laterals, including pipe collars, drops, inlets, grates, manholes and devices for outlet energy dissipation
  ▪ Construction of approximately 120 LF of new rock-lined channel on the northeast corner of the polo field
  ▪ Addition of an earthen swale at the northeasterly end of the ranch house
  • Replacement of the sewer line serving the stables, foremen’s house, main ranch house and existing restroom by adding approximately 1400 LF of new sanitary sewer lines, approximately 400 LF of French drains, and approximately 120 LF of new rock-lined channel
   Note: Disturbed area is approximately 0.09 acre.

2.1.3 Future Phases/Projects

The HMLP is a comprehensive document that addresses future needs for the restoration, preservation and stabilization of the Historic Landscape District at Will Rogers SHP. Some of the key future projects addressed, though not included in Phase I implementation, but expected to be accomplished in later Phases, are:
• Construction of a new Visitor Center in Management Area #7
• Construction of a new, approximately 50 space parking lot for visitor center
• Full restoration of historic guesthouse to interpretive use
• Removal of non-historic parking lot adjoining guesthouse and main lawn
• Reconstruction of historic driveway
- Restoration of original lawn areas
- Development of a new maintenance area in lower hollow Area #7
- Restoration of Bone Canyon into its historic configuration as pasture
- Adaptive use of Villa Woods Road residences for operational needs
- Placement of Josepho Barn on edge of park entrance road near Villa Woods Road

The cumulative effects are considered in this document.

2.2 CONSTRUCTION MANAGEMENT

The most effective and appropriate combination of resource avoidance, professional preservation treatments, and monitoring will be employed by State Parks during all phases of project construction and historic feature uses. Construction timeframe windows shall be placed on projects to prevent disturbance to biological resources as well as minimizing interruptions of public use.

Best Management Practices (BMPs) will be used to protect the resources on site and nearby for all phases of work activity. Environmentally Sensitive Areas will be fenced and/or avoided and all work will be conducted in accordance with U. S. Secretary of Interior Standards for Historic Properties (Weeks and Grimmer) and Cultural Landscapes (Birnbaum and Peters 1996).

Sediment control during construction will be implemented through a variety of erosion control features or construction BMPs to prevent or minimize the potential of sediment leaving the project site. The construction BMPs that will be applied to the project will, as appropriate or needed, include: 1) minimizing the extent of the disturbed area and duration of exposure, 2) stabilizing and protecting the disturbed area as soon as possible, 3) keeping runoff velocities low, 4) protecting disturbed areas from contact with runoff, and 5) retaining sediment within the construction area. The construction BMPs that will be applied to the project may include: 1) temporary desilting basins, 2) silt fences, 3) gravel bag barriers, 4) temporary soil stabilization through mattress or mulching, 5) temporary drainage inlet protection, and 6) diversion dikes and interceptor swales 7) containment and disposal of removed lead paint or other hazardous substances per State statutes and protocols.

Stormwater and pollutants will be contained on site and/or evacuated offsite to an appropriate, approved facility. No pollutants or sediment will be allowed to enter off-site sewerage and drainage systems. Disposal of potential pollutants will be conducted according to accepted protocols. Due to the sensitive nature of surrounding land uses and natural and cultural resources, all work will be coordinated to reduce impacts whenever possible.
In order to eliminate public safety and fire hazards, State Parks proposes to block off rehabilitation sites, construction areas, tripping hazards, or overhead obstacles; and prune vegetation to keep fire hazards reduced. Closures will be temporary and State Parks will endeavor to keep as much of the Will Rogers State Historic Park open to public as possible during the implementation of the projects and actions of the *Historic Landscape Management Plan*. The first phase of construction and implementation of the priorities identified in Sections 2.1 and 2.2 should be fully complete and open to the public in early 2004. However, the treatment plans for all work identified in the *HLMP* will be implemented as funding is approved and may take up to ten years to fully complete.

Additionally, a qualified state historian, state resource ecologist and state archaeologist must approve the final project plans prior to implementation, as is protocol for all projects reviewed in DPR. Construction staging areas will be located in existing or proposed parking areas or previously disturbed sites.

### 2.3 Project Alternatives Considered

The following project variations were considered in the planning process for the *HLMP*. The public either brought these alternative concepts forward during the public planning and scoping meetings or during public workshops, or from park staff working on the *HLMP* offered alternatives. They are not proposed as part of the *HLMP* due to potential resource impacts, inconsistency with DPR’s *Mission*, policies and regulations, or conflicts with the grant deed, general plan, operations and vision for the park.

#### 2.3.1 Add Historic Plantings and Irrigation Only

Remove non-historic plants and replace previously removed historic plants such as trees, shrubs, flowers, vines, and grass, and add an irrigation system to support their maintenance. A portion of the historic landscape would have an immediate visual benefit, enhancing the park’s “first impressions”. However, other critical infrastructure deficiencies such as drainage and neglected historic structures and other landscape features would not be addressed, resulting in the continued deterioration and loss of historic resources, and increased pressure on limited maintenance staff.

#### 2.3.2 Provide Historic Plantings, Irrigation And Drainage Only

The drainage system represents an essential critical infrastructure that is in dire need of repair. Scope of work would include repair of historic stone-lined culverts and some grading. This project would improve environmental conditions at the park and reduce moisture that has been accumulating near the historic Will Rogers home, and endangering the building and museum collections within. This
alternative would result in continued deferred maintenance on other contributing features of the historic landscape. Therefore other historic structure and landscape feature deficiencies would not be addressed, resulting in a continued strain on the support budget.

2.3.3 Build Visitor Center in Location Recommended by General Plan

Construction of the Visitor Center and related parking lot on Sarah’s Point as recommended by the General Plan would not allow the restoration of the historic period landscape (including the pasture) on Sarah’s Point, or the reconstruction of the historic road up to the historic core. This location would adversely impact the historic viewshed and precludes polo staging immediately adjacent to the polo field.

2.3.4 Build Maintenance Complex Where Recommended by General Plan

Construction of the Maintenance Shop complex in the area recommended by the General Plan would place day-to-day maintenance activities off a main road but directly in the public’s view, thereby impacting the quality of the historic experience. This location is also closer to adjacent neighborhood homes and would have greater proximity effects (noise and aesthetic) to those homes than the location recommended in the HLMP. This new location would remove the maintenance from the historic core resulting in reduced potential for conflicts with historic resources and improved aesthetics.

2.3.5 Retain Polo Practice Arena

Retention of the polo practice arena on Sarah’s Point as recommended by the General Plan would allow a site for other equestrian uses and demonstrations but would not allow for restoration of the historic landscape additional public facilities on Sarah’s Point. Additionally, the site is proposed for a needed detention basin for water quality control for the entire park during storm events, which can also be utilized for overflow parking. Retention of the Polo Practice Arena would also allow continued indoor polo play when the polo field is not available due to saturation or a scheduling conflict. However, indoor polo was not an athletic event that took place during the period of historic significance.

2.3.6 Equestrian Boarding in Bone Canyon

Equestrian Boarding in Bone Canyon is an option that was considered pending the outcome of the Park Interpretive Master Plan and an Equestrian Plan but rejected due to the adverse affects to the natural environment within the park which occurred over the past years when boarding was allowed. Equestrian boarding is limited to 45 horses or less under the 1992 General Plan in an area limited in size but is located outside of the historic zone. Because there are no
locations other than private homes to board horses in the immediate area, demand is high for equestrian boarding. However, as addressed in Section 4, the conflicts with the park purpose and past equestrian boarding are incompatible, and equestrian boarding for those who have utilized the park for this purpose is available in other locations within the Los Angeles area within 11 miles of the park.

2.3.7 Eliminate All Non-historic Uses

This alternative would reduce visitor utilization of the park, and deny the public recreational opportunities they have come to expect at state parks (organized events, soccer, weddings, concessions, filming, etc). The General Plan and the parks Declaration of Purpose encourage activities that enhance the Will Rogers SHP’s interpretive theme.

2.3.8 Eliminate All Equestrian Use of the Facilities

Horses were part of the daily life of the Rogers family, and have always been an essential interpretive element of the park, which helps give visitors an insight into Will Rogers’ way of life. Equestrian use as an interpretive element was specifically recommended as desirable in both the General Plan and the Declaration of Purpose.

2.3.9 Do Not Provide ADA Access

The Americans with Disabilities Act of 1990 and California’s Title 24 require that services, programs and activities must be readily accessible to individuals with disabilities. This alternative would not only put the Department in violation of applicable laws, but would leave DPR vulnerable to legal actions. ADA compliance will be accomplished through equal access to all programs at Will Rogers SHP while utilizing the Historic Building Code to help compliance with both ADA and historic preservation mandates.
Figure 2.0 go to: Management Area Key Map.pdf
For Figure 2.1 go to: Conservation Plan-Area1.pdf
For Figure 2.2 go to: Conservation Plan-Area2.pdf
For Figure 2.3 go to: Conservation Plan-Area3.pdf
For Figure 2.4 go to: Conservation Plan-Area4.pdf
For Figure 2.5 go to: Conservation Plan-Area5.pdf
For Figure 2.6 go to: Conservation Plan-Area6.pdf
For Figure 2.7 go to: Conservation Plan-Area7.pdf
For Figure 2.8 go to: Conservation Plan-Area8.pdf
For Figure 2.9 go to: Conservation Plan-Area9.pdf
For Figure 2.10 go to: Conservation Plan-Area10.pdf
3 ENVIRONMENTAL SETTING

3.1 LOCATION AND DESCRIPTION

Will Rogers State Historic Park is a 187.5 acre unit within the Topanga Sector of the Angeles District of the California State Park System, and is located between Pacific Palisades and Brentwood on Sunset Boulevard, about three miles southeast of Pacific Coast Highway. The park is a thirty-minute drive from downtown Los Angeles, and only minutes away from Will Rogers and Topanga State Beaches to the south, and Topanga and Malibu State Parks to the north and west.

Will Rogers Ranch (now State Historic Park) is listed on the National Register of Historic Places and is a historic landscape district resource. The Ranch district is comprised of sixteen historic buildings and structures, and numerous landscape features and elements including circulation and water features, topographic features, and vegetation. It is significant as the home of Will Rogers, a person of international historical importance in American history. Its cultural landscape features, including numerous structures, features and grounds, have a high level of historical integrity.

3.2 COMMUNITY, LAND USE AND PLANNING

The project site is located in the incorporated boundaries of the City of Los Angeles adjacent to the communities of Pacific Palisades and Brentwood. Because the census statistics for the area includes geographic areas a long distance from the project site, the nearby cities are included in the following demographic analysis from the 2000 U.S. Census. The community character of Topanga, adjacent to Topanga State Park (which abuts Will Rogers SHP) is located inland near the project site and appears to closely match the character of the immediate local of Pacific Palisades which is near the project area, and so is included in this analysis. Census figures for the combined communities of Pacific Palisades/Brentwood report a total population 54,118. Population characteristics in the combined area show as 86.5% White, 0.9% Black, 0.1% Native American, 5.8% Asian, 4.1% Hispanic, and 2.5% other. The portion of Census Tract 8005.1 which includes Topanga and the unincorporated county has 2008 residents, of which 88.9% are White, 4.0% Hispanic, 1 % Black, 0.3% Native American, and 5.7% Asian.

Population characteristics in Malibu are 91.9 % White, 0.9 % Black, 0.2% Native American, 2.5% Asian and 5.5% Hispanic. Calabasas population characteristics show 86.9% White, 1.2% black, 0.1% Native American, 7.7% Asian and 4.7% Hispanic. Santa Monica population characteristics show 78.3% White, 3.8% Black, 0.5% Native American, 7.3% Asian and 13.4% Hispanic. The population characteristics of these three cities and the nearby unincorporated area are
radically different than the population characteristic of Los Angeles County as a whole at 48.7% White, 9.8% Black, 0.8% American Indian, 11.9% Asian and 44.6% Hispanic; however, the urban center of the City of Los Angeles is located within a 30 minute drive.

Will Rogers SHP is located adjacent to both residential areas and Topanga State Park. Access into the park is through the residential areas. These residences are located in what appears to be a quiet and affluent community. As shown on Figures 1.2 and 1.3, the area of the park where most activity takes place is geographically separated from these residences.

The park is located within the Santa Monica Mountains and connects to Topanga State Park. The areas located outside the historic zone are part of the Santa Monica Mountains National Recreation Area (SMMNRA). According to the SMMNRA Draft General Management Plan & EIS, the mission of the SMMNRA is “to protect and enhance, on a sustainable basis, one of the world’s last remaining examples of an Mediterranean ecosystem, and to maintain the area’s unique natural, cultural, and scenic resources, unimpaired for future generations. The SMMNRA is to provide an inter-linking system of parklands and open space that offer compatible recreation and education opportunities that are accessible to a diverse public.” (National Park Service 2000).

3.3 HISTORIC BACKGROUND & RESOURCE DESCRIPTION

The historical period at Will Rogers SHP begins with the Spanish Colonial exploration of the Pacific Palisades area. The first explorations occurred before 1800 when the soldiers and missionaries of the Spanish Colonial government entered the area in search of sites for settlement and use. Permanent Euro-American settlement took place in the neighboring areas of Rogers’ future ranch during the Mexican Republic Period (1822-1846). During this period the Mexican government confirmed the surrounding Rancho San Vicente y Santa Monica, Rancho La Ballona, and Rancho Boca de Santa Monica land grants. After the American purchase of California the families owning the land entered into years of litigation over boundary and ownership disputes—some of which were not settled until the 1880s.

By the 1880s Santa Monica had become a popular vacation spot for Los Angeles residents and visitors. This triggered the influx of large numbers of real estate speculators to the area. Among them was Robert Gillis who purchased thousands of acres in the Pacific Palisades for his Santa Monica Land and Water Company. In 1923 noted Los Angeles developer Alphonzo Bell (Bel-Air) purchased 22,000 acres from Gillis for his Pacific Palisades development project. By that time water and power service had been extended out toward the property that Will Rogers would later develop as his ranch home. During this early period the land was leased to Japanese truck farmers who raised vegetables on the mesa-top land, later to become the Polo Field.
Will Rogers’ interest in the property began as early as 1923. Rogers, a former cowboy and trick roper, and popular humorist and entertainer, had moved to California in 1919 after signing a contract with Goldwyn Studios. He and his family purchased their first home in Beverly Hills. According to his sons, Rogers however longed for the wide-open spaces and looked to the Palisades/Rustic Canyon area as a place to build a hide-away ranch home. With grading for the extension of Beverly Boulevard (later Sunset) started in 1925, Rogers began to act on his interest in the area. In January 1926, Will’s wife Betty Rogers signed a lease agreement with Alphonzo Bell for the property. The first grant deed was signed for segments of the property in 1928 and by 1934 Rogers would own 346 acres in all surrounding his “ranch.”

In 1926, Rogers began to improve and develop his rural ranch estate. Roads, bridle paths, a golf course, polo field, and the landmark white rail fencing was soon developed. In early 1927 Rogers obtained a permit for a 24 x 60 foot, six-room house for the ranch. For nearly a decade Rogers would oversee the development of the entire property. Building construction, landscaping features, trails, and alterations were continuously directed by Rogers himself.

A key element to the ranch development was its equestrian activities and facilities. For Rogers, riding and roping was a form of relaxation from his rapidly expanding role as a worldwide media star. Trail riding, polo games, trick riding and roping were regular parts of Rogers and his family’s life at the ranch. The equestrian emphasis of the property is reflected in the most architecturally striking of the ranch buildings, the stable building that was moved to the site in 1929.

By that time the Rogers ranch was in full use by the family. One year later there was no doubt that the Rogers’ had made the ranch their permanent home. In that year plans to expand the house with a north wing were completed. The house became the family and social center of the ranch. It often served as the site of informal outdoor barbecues and parties. The ranch house and grounds were being developed so that Rogers could protect his private life from his rapidly spiraling celebrity status and public popularity. Visitors to the ranch also enjoyed its comfort and its simplicity and praised the Rogers hospitality.

The last flurry of remodeling and new construction to the ranch and ranch house took place in 1935. A second story addition of three bedrooms was built onto the south wing, as were additions to the north wing of the house. Later that year a three-room cabin was built in Rustic Canyon and a three-room caretaker’s dwelling built on the site of the mule barn.

Unfortunately, Will Rogers was killed in an airplane crash with pilot Wiley Post on August 15, 1935 at Point Barrow, Alaska. He was 56 years old. The California Ranch was left in the control of Mrs. Rogers. Due to heavy tax burdens, the Depression economy, and then World War II, selling off the ranch for development was not likely to occur. To help with the War effort, Betty Rogers decided to open the house for tours to benefit the Red Cross. In doing so she
instructed former ranch employee Emil Sandmeier to return everything to the house in the way he remembered it when the family resided there, including furnishings and family possessions.

Through the efforts of Sandmeier, Will Rogers Jr., and others, Mrs. Rogers agreed to transfer the ranch to the State of California. On June 20, 1944 the State Park Commission adopted a resolution to accept a deed of gift of the ranch and personal property as a unit of the State Park system. The property was conveyed with the intent of having a public park as a memorial and historical monument to the memory of Will Rogers, one of the most beloved Americans of his time. The Department of California State Parks has operated the park since that time.

3.3.1 Historic Sites, Structures and Landscape Features

Will Rogers Ranch Home is listed on the National Register of historic places. Its unique collection of historic structures and landscape features oriented within a distinctive spatial organization defines it as a historic landscape type of historical resource. The Will Rogers Ranch historic landscape district includes fourteen standing historic structures, two reconstructed structures, and numerous historic landscape elements and features. Three historic sites including two former Rogers’ period structures and the site of the former Japanese Truck Farmers structures have also been recorded at the park. All of these structures or features were central to Will Rogers and his family’s private and public life at the ranch. They were all designed, built and modified under Will Rogers’ direction, except for the cherimoya grove, and the Japanese truck farmers’ structures, which were there when Rogers arrived at the property in 1925.

The following provides a summary discussion of the main structures, features, and elements of the Will Rogers historic landscape district resource.

3.3.1.1 Ranch House (Historic Structure)

The ranch house is centrally located in the park, facing southeast, with a view across the polo field to the Pacific Ocean. The House is a two-story wooden building, consisting of two wings connected by servant quarters and a patio. Originally designed as a six-room vacation cabin in 1927, the ranch house was extensively enlarged and modified over the years (the last major remodel occurred in 1935) by the Rogers family after it was made into their family home in 1929. From the first six-room cabin to the last addition of the second story above it, the changes to the house were a direct result of Rogers’ and his wife’s decisions, down to the last detail. Further changes were often made once construction was in progress. More ideas for remodeling the house were also in the planning stages, but were never carried out once Rogers had died.
Although the house had a haphazard evolution in its construction, its style is that of “Western Ranch House”, the label given to affluent California ranch houses. The house is noted as an early example of what would become this very popular style of residential architecture. After Rogers rejected plans for an Italian villa style, he decided to model the house after one he had admired in Montana. Using photos of the Montana ranch house, architect Ken Reese designed this unpretentious home in which Rogers could comfortably live.

Today the servants’ quarters and north wing guest room serve as state administrative space. The south wing bedrooms (one downstairs, three upstairs) are used for museum storage. A utility room is used for housekeeping supplies. The rest of the rooms are furnished as house museum exhibits and are viewed by the public.

The major portion of this historic house museum contains the Rogers family’s original furnishings and artwork. Some of their furniture was brought from their Beverly Hills home. The major pieces (in the living room, Rogers’ study, and the family bedrooms) were purchased at Barker Brothers, considered at the time to be one of the finest furniture stores on the West Coast. The basic Monterey style selected by family was a custom design made by the Mason Furniture Company of Los Angeles. The Rogers’ attachment to their Oklahoma roots is evident in their decorative and fine art collection of Western Americana. The paintings, drawings and sculptures, comprised of the work of early 20th-century Western artists, some of whom were personal friends of Rogers, are an important part of the Rogers’ collection. Rogers also accumulated an extensive collection of Native American and Western artifacts. A separate currently funded project for artifact conservation and stabilization of some of this collection is currently underway.

The Ranch House is in good condition although concerns over poor drainage and deferred maintenance exist. Currently there are several funded projects that exist separate from this plan’s actions, which will assist in stabilizing the structure and improve the interior environment to benefit the long-term preservation of the building and museum collections.

3.3.1.2 Laundry Building (Historic Structure)

The laundry building was constructed in the early 1930s against the hillside northwest of the ranch house to replace the old laundry room in the servants’ quarters. The structure’s high shed roof and skylight, along with glass doors and windows, provided ample light and air circulation to offset the heat generated from the small boiler room adjoining the south wall. Adjacent to the north side of the laundry room, a concrete lined enclosed yard was utilized for hanging clothes to dry.

State park staff now use the room as a meeting and storage room.
3.3.1.3  Lath House #1  (Historic Structure)

Located north of the clothes-drying yard, this structure housed a trash incinerator, and was also used by groundskeepers to pot and grow the ornamental plants that decorated the patio and flowerbeds surrounding the house and grounds.

The Lath House shows signs of excessive deferred maintenance and requires significant restoration treatments.

3.3.1.4  Film & Meter Switch Vaults  (Historic Structure)

Probably built in 1935, these two adjoining cement-lined rooms are in the hillside retaining wall west of the ranch house. The meter switch room held the original control panels for the electrical system for the house, while Rogers kept the library of films in which he had appeared in the film vault room.

These vaults are now used for park storage and are in fair condition.

3.3.1.5  Furnace Vault [or Furnace Room]  (Historic Structure)

The furnace vault was built in 1935 to provide the ranch house with forced-air heat, instead of having to rely on fireplaces or electric wall radiators for warmth.

This room is currently not used and is in need of general maintenance.

3.3.1.6  Guest House and/or Garage (Historic Structure)

This two-story, 2,436 square foot structure, designed by E. Sprout and built in 1928, matched the original ranch house in color and style. The downstairs contained a garage and chauffeur sleeping quarters; the upstairs guest quarters contained a kitchen, bath, living room and 2 bedrooms, and a full-length balcony. When not occupied by a guest, it was used for storage.

The Guest House/Garage is located to the west of the Ranch House. Immediately north of it is a narrow areaway with a steep slope ascending upward toward the ridgeline. The hillside is contained behind a stone retaining wall. A wood pedestrian bridge spans the areaway and connects the guesthouse to the hill behind it. To the south of the building is a narrow strip of foundation plantings, a paved path, a historic cobble stone wall and a steep bank sloping toward the parks-built comfort station.

The building is sited into the slope of a hill and the maintenance of the exterior grade and drainage is an ongoing issue. The flush solid core doors at ground level show signs of wear and water damage. The HLMP recommends
replacement of the doors with compatible materials per the Secretary of the Interior's Standards. The building shows signs of decay from deferred maintenance and subsequent deterioration.

The building is currently used as a visitor center, where an audio tour and film documentary are offered downstairs; upstairs houses employee offices. A separately funded project to upgrade the interpretive exhibits at the park is currently underway.

### 3.3.1.7 Tennis Court (Historic Structure)

Constructed in 1928 west of the guesthouse, this simple asphalt tennis/basketball/handball court surrounded by a high cyclone fence was utilized by the Rogers' children and family guests. The Rogers’ children also occasionally used the court to practice polo shots, riding bicycles instead of horses.

Today the park sometimes utilizes the tennis court and it is in need of general restoration.

### 3.3.1.8 The Barn or Stable (Historic Structure)

The Stables are located between Mitt canyon and the Riding Arena. This patchwork of pieced buildings with stalls on either side of an open rotunda, first assembled on site in 1928 between the riding arena and Mitt Canyon, was always called the “Barn” by Will Rogers and housed polo ponies and riding horses. Outside, in the front of the east wing, two of Rogers’ favorite horses are buried.

The stalls are structured of tongue and groove boards with crown molding running along the tops of the partitions separating the stalls. The lower portions of the stall walls are clad in vertical planks laid across them to guard against horse kicks. The stalls feature thick Dutch doors with metal capping on the tops and sides to discourage damage from cribbing and kicking. Doors located along the aisles are historic four panel wood doors with a variety of modern hardware. Windows along the stalls are fitted with 9 late awning sashes. Windows are secure behind rebar screens to prevent breakage by the horses.

Wood decay caused by water intrusion is evident at selected posts and base trim in the northern side of the rotunda. Various vulnerable wooden surface areas within the stalls have been broken or splintered by horses. Miscellaneous areas and fittings are missing decorative trim, including cornice moldings. Gutters and downspouts on the north side of the building are misaligned and split.
The stable most recently was the headquarters for an equestrian concession, which included concession housing, and a public restroom and telephone.

3.3.1.9 Shed [behind the stable] (Historic Structure)

Built after 1928 and located northwest of the stable, and designed to match that structure, this two-room shed for feed and tack utilized a hillside as its north wall, and was most recently used by the equestrian concession. The structure is in need of restoration and general maintenance.

3.3.1.10 Ranch Foreman’s House [mule barn/old barn/bunkhouse] (Historic Structure) & Mule Barn Site

This three wing-U-shape structure, first used as a mule barn, is believed to be the first building constructed on the property. After a horse tied to a post pulled part of the roof down in the early 1930s, two wings were pulled down, leaving only the southwest wing, which was used as foremen’s living quarters. These quarters were remodeled and expanded in 1935. After Rogers’ death, the building was converted to a bunkhouse. [Construction features and foundations to the original mule barn of the north and east wings of this early structure may be present below the lawn in front of the ranch foreman’s house.]

The Ranch Foreman’s House currently is used as a state residence, and has undergone major repairs and remodeling. It requires a series of repairs and restoration treatments due to water intrusion and dry rot damage.

3.3.1.11 Carpenter & Blacksmith Shop (Historic Structure)

The Carpenter/Blacksmith Shop is located between the Foreman’s Quarters and the Hay Barn. Built early in 1927, this structure consists of two separate sheds connected by a low-hipped roof that provided covered working space for the full-time blacksmith and the frequent carpenters hired to work on Rogers’ projects.

The building abuts a steep, wooded hillside to the east and paved parking to the west and north. There is a gravel path to the south of the building. Deferred maintenance and subsequent damage is evident on the structure. The south shed has evidence of water infiltration. There is dry rot on the eaves as well as on the exposed purlin ends. Failed roofing materials and paint delamination is responsible for this damage. The 1X roof sheathing boards and facia trim show areas of decay and damage. All decayed and or damaged boards will be replaced. The exterior siding is cracked and has signs of decay. There is evidence of prolonged settling. The roof has buckled in some areas and will be shored up to prevent further damage.
The north end of the building currently is used for park maintenance storage. The south end houses a blacksmith work area display, and the park’s nature interpretive center.

### 3.3.1.12 Hay Barn (Historic Structure)

The Hay barn is located east of the riding arena, between the greenhouse and the Carpenter/Blacksmith Shop. Most likely built in 1928, the barn was used to store hay, feed and related supplies for the ranch’s horses.

The structure is built into a hillside that rises steeply into the east. The Hay Barn is a 4,500 square foot, wood frame structure. It has three major areas: an enclosed loft, equipment shed and a canopy extension. The Hay Barn is an inexpensively constructed box frame structure displaying a variety of materials and building techniques. The building is roughly 72 ‘X 41’. The foundation is composed of a variety of systems and materials, including concrete, mortared stone, mudsill and post on concrete footings. The exterior walls are just as varied in terms of construction and materials.

First used by DPR as a potting shed, the interior floor has been cemented and the space partitioned for use as the park’s maintenance shop. The Hay Barn is in the poorest condition of all the structures and requires an extensive restoration treatment. The problems facing the building result from a number of factors including relatively insubstantial building materials, insufficient engineering and geologic instability. The longstanding problems stemming from the slumping of the hill to the east was temporarily mitigated by the construction of a pressure treated retaining wall. Problems caused by this condition and subsequent additions and alterations must be corrected. Stabilization will occur in Phase I, and full restoration efforts will occur in subsequent phases.

### 3.3.1.13 Gatehouse & Garage (Historic Structure)

Will Rogers built a small board-and-batten cottage consisting of a main room, a kitchen outfitted with a stone fireplace and cast-iron stove, a bathroom and a one-car garage a few yards east of the house, to serve as a gatehouse to the property in 1931. He built this as Mrs. Rogers felt more secure with an entrance gate and he preferred not to have to deal with locking/unlocking the ranch gate. A later expansion of the kitchen changed the configuration of the front porch, and a room was added on the north side of the house.

Today the gatehouse is a state employee office and is fair condition. The main need is for implementation of deferred maintenance and general restoration treatments.
3.3.1.14  **Spring Vault (Historic Structure)**

Built in 1926 when the entrance road was graded, the spring vault was designed as an erosion control method to prevent hill slides. The water continues to run from inside the hill into Rustic Canyon Creek. The original wood pillars still support the interior, though the cement exterior has been refaced.

The Spring Vault received a modern upgrade in the 1990s and requires regular maintenance to function properly.

3.3.1.15  **Practice Polo Cage (Historic Reconstruction)**

The original polo practice cage was built northwest of the roping area in 1928 and moved to Mitt canyon in 1931, where it fell to disrepair. Early in 1980, the polo cage was reconstructed similarly to the original and located northwest of the hay barn. The wooden horse is a replica; the original artifact is in storage.

The current plan calls for a proper reconstruction to original design and return to its original location.

3.3.1.16  **Brood Mare Barn/Loafing Shed (Historic Reconstruction)**

The brood mare barn, originally a loafing shed, was moved into the Heart Canyon corral and used to house brood mares and their foals in 1935/36. By 1961, the structure was in disrepair, and in 1963, one wall was salvaged and the barn was rebuilt.

Today the barn is used as storage space for the park, and continues to deteriorate due to water damage.

3.3.1.17  **Polo Field (Historic Feature)**

The polo field was graded, fenced and planted with Bermuda grass in 1926 while Rogers still leased the property. Rogers planted eucalyptus trees along the east, west and south sides of the field. The first of three polo fields in the neighboring area, it is 20 yards shorter and a few yards narrower than a contemporary regulation field. The polo field was used about three months out of the year. Games were played on weekends when Rogers was home, and his sons would practice on the field in his absence. The field was also used intermittently for landing private planes or for calf roping. Rogers had a small holding pen and calf chute built on the south side of the field in the early 1930’s.

Today the field is used for polo games and league sports on a regular basis by neighboring clubs. When not in use, park visitors picnic and play games on the field. The Parks construction of the current visitor parking area in the 1950s
altered the original drainage system for the polo field and has resulted in increased maintenance problems.

3.3.1.18 Riding Arena (Historic Feature)

The long narrow corral south of the stable was built in 1928 for trick riding so Rogers could continue to improve his children's skill in the sport. The equestrian concessionaire most recently used it to teach riding and jumping lessons.

Several parks repair projects over the years have altered the historic design. A restoration program based on historic documentation is needed.

3.3.1.19 Roping Arena (Reconstructed Historic Feature)

Completed in the spring of 1928, and one of the most unique structures on the ranch, the roping arena (called the “corral” or “ring” by the family) is one of the most significant features because much of Rogers’ time at home was spent here roping calves. In the early 1930s the ring shape was altered to one similar to designs Will had seen in South America. A fire damaged much of the Roping Arena in the 1980s and in 1999 the roping arena was reconstructed to its historic shape.

Today the arena is used by DPR for storage, and occasionally by equestrian visitors. Parks had built a small grandstand on the west end to allow visitors to see into the arena for interpretive programs.

3.3.1.20 Mitt and Heart Canyon Corrals (Historic Feature)

Whitewashed redwood rail fenced corrals were built around the perimeters of Mitt and Heart Canyons to accommodate horses turned out for exercise. The equestrian concessionaire most recently used the two corrals for turnouts.

These corrals require repair and regular maintenance.

3.3.1.21 Pasture Areas (Historic Features)

Rogers used several areas behind the stable, and other ranch outbuildings in Heart and Bone Canyons, as pasturage for his horses and livestock. The pastures have been used for many years by a concessionaire/lessee for use by boarded horses. At this writing Mitt Canyon Pasture does not have good pasture cover. Its gradient and extensive bare areas make it vulnerable to run-off and erosion from seasonal rains. The fence line is now on the inside of the tree line, which is discontinuous. The partitioning fence and gates have been changed. Hillsides have not been brushed back in many years, but allowed to grow in the
pasture edges. Recently a road was re-cleared around the perimeter, and the brushwork was completed.

Heart Canyon also lacks good pasture cover. The fence line is considerably changed. Previously used pipe corrals have been removed from all the canyons.

Bone Canyon is the most changed and has for many years been used for the boarding of private horses in a complex of metal pipe corrals. Its floor is compacted and denuded, and drainage structures have been constructed to convey some of the canyons storm drainage. A variety of temporary structures existed to support this operation, including feed, tack, and manure stations. All have been subsequently removed. A dressage ring was constructed above the gabion wall in a debris basin that expanded into native shrub areas, all of which have been removed.

The existing pasture areas consist of a mixture of perennial rye and blue grasses. There has also been the introduction of kikuya grass. According to park staff the pasture (meadow) areas have received a regular program of cultivation, which includes aeration, over-seeding with Pierce College grass (wheat grass), aeration, seeding, top dressing with a humus fertilizer.

At present Mitt & Heart Canyon are not permanently irrigated. Whenever irrigation is required the District uses a traveling rotating sprinkler system.

The Historic Pastures require a mixture of treatments including restoration, preservation, and reconstruction. Historic fence lines, grades, pasturage, and the removal of non-historic structures and uses will be necessary.

### 3.3.1.22 Japanese Truck Farmers Structures (Historic Site)

This site is on the outcropping southeast of the polo field. The small house and associated structures were leased by the Japanese truck farmers in the early 1920s, and used for their residence and/or business. The structures appear in an early aerial photo about the time Rogers developed his polo field, though no physical evidence of any structures now remains above ground. This site requires protection and interpretation.

### 3.3.1.23 Practice Polo Field (Historic Site)

Park Residences #4 and #5 are located west of the park entrance gate on property that was farmed in the early 1920s. Two 1926 photos show this northernmost part of the mesa planted with alfalfa. A dirt polo field was built on the west mesa about the same year the polo field was constructed. The mesa was frequently used as a second polo field. The site is now developed and no remains of the Practice Polo Field are present.
3.4 Ethnography & Archaeology

The natives of the Los Angeles area called themselves Kumivit or Tongva; they are better known as Gabrielino, named after San Gabriel Mission, to which many were relocated. The Tongva, one of the most populous, wealthy and powerful native groups in Southern California, prehistorically occupied all of the Los Angeles Plain, the eastern end of the Santa Monica Mountains, and the four southern Channel Islands. Unfortunately, relatively little information on their traditional ways of life was preserved, and few of their cultural traits have survived their missionization, epidemics, secularization and economic repression.

Major villages along Santa Monica Bay were permanently occupied, with an average of 50 to 100 people at each village. These villagers relied primarily on marine resources. Smaller, seasonal villages were located near inland food sources such as pine trees.

Houses were domed, circular structures made of local plant materials. Other structures included a sweat house, menstrual huts, and a ceremonial enclosure. Though much of the important culture was made of perishable materials, it included many elaborate and artistic artifacts made of shell and steatite.

No prehistoric Native American sites, features or isolated artifacts have been identified or reported at Will Rogers State Historic Park.

Though many historic structures and features have been recorded in the park, no historic archaeological resources are known to exist on site. A report on file with DPR’s Cultural Heritage Section by Thomas King, a UCLA archaeology graduate student who surveyed the entire 186.5-acre unit in 1974, identified no archaeological sites, features, artifacts or sensitive areas. All developed areas and trails were surveyed again as a part of the historic structure survey for the General Plan, with similar negative findings.

Several small archaeological surveys have been conducted in the park vicinity, including all of Rustic Canyon below the park. Only one prehistoric site was found during these surveys, CA-Lan-224, which was excavated in 1985; DPR determined the site to be insignificant with respect to CEQA requirements. An examination of cultural sites in this general region by the UCLA Archaeological Information Center indicated that prehistoric sites tend to be situated on descending ridges, within easy access of springs and drainages. Extensive land leveling and construction of horse trails on the ridges in the park have greatly reduced expectations of finding any prehistoric sites.

3.5 Landform and Geology

The following is a brief description of the natural resources identified at Will Rogers SHP derived from the unit’s Inventory of Features, data on file at
departmental headquarters in Sacramento, site surveys by department staff, and the existing General Plan.

3.5.1 Topography:

Will Rogers SHP lies in the eastern Santa Monica Mountains, approximately 1-½ miles from the Pacific Ocean. The park is at the southern toe of a ridge between Temescal and Rustic Canyons. Most of the park has a southern exposure. A key topographic feature of the park is its steep terrain: approximately 55 percent of the park has slopes in excess of 30 percent. Below the steep slopes of Inspiration Point, grading and filling has reduced slopes to less than 7.5 percent. Building sites, the stables and the polo field are generally flat.

Site elevations range from about 225 to 751 feet above mean sea level. Inspiration Point (751 feet) provides a spectacular panoramic view of Santa Monica Bay, the Santa Monica Mountains, the Palos Verdes Hills, adjacent communities, and downtown Los Angeles.

3.5.2 Geology:

Will Rogers SHP lies in the Transverse Range Geomorphic Province, which includes the Santa Monica Mountains. The eastern part of the Santa Monica Mountains is a large, complex, western-plunging anticline that has been severely deformed by mountain building, alluvial deposits, and faulting. At the southern base of the mountain is a broad depositional plain: above this are marine terraces. Tertiary and Cretaceous-aged shale, sandstone, and conglomerates of marine origin underlie these young surficial deposits. Early Cretaceous-late Jurassic slate and schist, which have been intruded by granite rock, form the basement rock formation.

The oldest formation in the area (Santa Monica) consists of block shale and clay sandstone, which have metamorphosed into black slate and fine-grained schist intruded by granite rock, however this formation does not appear in the park. The oldest rock formation found at Will Rogers SHP is the Tuna Canyon Formation, comprised of consolidated sedimentary rocks of marine origin. It is very noticeable because of the abundance and roundness of cobbles and boulders, and the presence of hard gray sandstone in the course, brown-to-reddish–brown conglomerate. The Modelo Formation rests non-conformably over the Tuna Canyon Formation, suggesting extensive deformation prior to deposition. The formation consists of inter-bedded, hard, platy, siliceous shales and softer brown shales, with massive lenticular beds of medium-to-course-grained buff-colored feldspathic sandstone. Santa Monica Plain Deposits overlay the older formations. These include marine deposits, non-marine alluvium, and stream alluvium. Marine deposits are primarily sand and slays; other deposits are comprised of poorly sorted fragments.
Numerous pre-quaternary faults occur in and around Will Rogers SHP. These faults show no activity in formations that are less than two million years old; however, they may be relatively young, and capable of becoming active. Major quaternary faults exist to the north, south and east sides of the park. Many of these faults, especially those showing displacement in the last 10,000 years, are sources of large, historic earthquakes. Damage from ground shaking, fault rupture, and seismically induced slope failures could be substantial.

The Modelo Formation has a high potential for landslide hazards such as small and large-scale slope failure, heading plane failure where bedding dips out of natural slopes and artificial cuts, and rotational failure along slopes where fractures occur which are saturated. Debris flows (plants, soil and underlying rock failures) and earth flows (plants and soil failures) are most likely on steep slopes in the Modelo Formation.

Mineral resources are not well described in the park. Marine shales of the Modelo Formation may contain petroleum and natural gas, but no reserves are reported in this area. While limited sand and gravel extraction has occurred in the past from the Tuna Canyon and Modelo Formations, this activity no longer occurs.

3.5.3 Soils:

To major soil association types (San Andreas-San Benito and Pleasanton-Ojai) occur in the park. Additionally, fill land in the developed Primary Historic Zone can be considered a type of soil. Specific soil maps have not been prepared for the park, and the existing mapping is based primarily on known association characteristics and slope calculations.

The San Andreas soils generally occur on steep slopes (30 percent-75 percent), are well drained and moderately permeable, and have moderate fertility and moderate rill and sheet erosion hazard. San Benito soils are similar, but deeper (36-48 inches compared to 24-36 inches), and have higher inherent fertility. These soils occur throughout the northern portion of the park. Pleasanton soils occur on slight slopes (2-9 percent), are more than 60 inches deep and well drained, have moderately slow water permeability, and a low inherent fertility. Ojai soils are similar. These soils occur in the central and southern portion of the park.

Fill lands can have a variety of sources, and there is no definitive soil profile. Generally, these soils are well drained, but other characteristics (permeability, runoff, erosion hazard, effective depth, and water holding capacity) are not known. Site investigations are needed to determine the soil's suitability for specific uses. This soil occurs only in the developed areas.
3.6 Hydrology

The park is located in hydrologic unit #180700003, as designated by the U.S. Geological Survey. Rustic Canyon Creek drainage (5.9 square miles) is the major watershed, draining more than 80 percent of the park. Rivas Canyon (1.1 square miles) drains the westernmost portion of the park, and joins Rustic Canyon downstream of the park. The drainages (Heart, Mitt and Bone Canyons) in the park were initially graded, filled and channeled during the construction of the historic Will Rogers property in the late 1920's and early 1930's. The historic drain system channels water into Rustic Canyon, and supports intermittent streams.

Changes have been made to the park that have significantly changed drainage patterns. Runoff from Bone, Heart and Mitt Canyons is channeled into a single rock-lined ditch that follows the hillside behind the ranch house and laundry room. Runoff that bypasses the ditch continues downhill over the golf course toward the main ranch house and parking lot. Runoff that at one time ponded northeasterly of the polo field is now channeled onto the polo field. This drainage pattern in this part of the park has contributed to water damage to the laundry room and main ranch house, and to the flooding of the polo field. Additionally, runoff coming off the hillsides behind the hay barn, foreman’s quarters (currently being used as a park residence) and carpenter/blacksmith shops reached those structures causing water damage.

State Park projects over the years have added fill material to several canyons around Sarah’s Point that has increased the usable area there. Because these and previous fills have been inadequately compacted, as documented in the Will Rogers State Historic Park Geotechnical Investigation Report, these fills have created unstable slopes. During periods of heavy rain, surface runoff creates mudslides in these canyons that threaten the Gate House and the historic entrance road.

Another area of concern is the natural area outside the primary historic zone. The roads in this area have been drained via graded channels leading to concrete inlet boxes. Corrugated metal pipe culverts originate at the inlet boxes, carry the runoff beneath the road, and expel it onto the hillsides. Severe erosion is evident at many of these locations. The functionality of the systems at several locations has been impacted by damage from road maintenance machinery to inlet structures and culverts.

In response to several District-identified problems, two Architectural & Engineering (A&E) service contracts were let to investigate suspected causes of the problems and to make recommendations to correct them. The products of those A&E service contracts are the Will Rogers State Historic Park Geotechnical Investigation Report and the Master Drainage Plan For Will Rogers State Historic Park.
Both documents present recommendations that affect every Management Area in the HLMP. Specific recommendations may be found in each respective section of the Conservation Plans Per Management Area.

Based upon the investigation during site visits and a review of planned construction, several areas within the Park have the potential to contribute pollutants into the stormwater system. These were the new Visitor Center and parking lot at Sarah’s Point, the horse stables in Bone Canyon and Sarah’s Point, the eroding hillsides, and both landscaped and maintenance areas. The existing visitor Center parking lot also contributes to stormwater pollution, however, since these will be restored to its original condition when the new visitor center and parking lot are constructed, only the new visitor center and parking lot were analyzed. Potential problems and solutions are discussed in 5.2.5 of this document, the Master Drainage Plan, and the HLMP (Pgs 150-152).

3.7 BIOLOGICAL RESOURCES

Will Rogers State Historic Park encompasses five native plant communities and supports a limited fauna of approximately 140 animal species. The vegetation and fauna are representative of the Southern California coastal mountains biota, and are noteworthy mainly because little remains of their historical habitats.

The park’s geology, topography and climate largely determine its biotic characteristics. Underlying rock formations and the area’s steep slopes allow for poor-to-fair soil development. This is compounded by low rainfall, which occurs during a limited period of the year and further reduces soil development rates. The low rainfall forces adaptations by plants and animals to a relative arid environment.

Abiotic (physical-chemical) factors and biotic assemblages combine to form ecological systems. Independence between the system components constitutes the basis of the ecosystem concept in ecology. Two mayor ecosystems occur in the park--terrestrial and aquatic. The terrestrial system comprises more that 99 percent of the park; the aquatic system (including portions of riparian areas) is less than one percent of the park. Five terrestrial natural plant communities support three vertebrate animal communities. One perennial spring supports a poorly developed and restricted aquatic community.

Rustic Creek supports the only true aquatic community. In very dry years this stream historically may have dried up, but urban runoff is apparently now sufficient to keep the creek watered throughout the year.

3.7.1 Plant Life

Ninety species of native and naturalized vascular plant species were identified in Will Rogers SHP, along with some 50 taxa of cultivated, ornamental plants. The
vascular plant inventory represents limited fieldwork in an extremely dry year and therefore, should be regarded as incomplete. More field reconnaissance is needed.

Five plant communities are represented in the unit. These are (1) chamise chaparral; (2) Ceanothus megacarpus chaparral; (3) Venturan coastal sage scrub; (4) southern coast live oak riparian forest; and (5) riparian woodland. All five communities are becoming increasingly restricted in their distribution in southern California as a result of urban development. Chamise chaparral and Venturan coastal sage scrub are the predominant vegetation types in the natural areas of the park. Southern coast live oak riparian forest and riparian woodland are restricted to the natural drainage bottoms around the park’s perimeter.

No rare, endangered or sensitive plants have been found within the boundaries of Will Rogers SHP. However, further field surveys are needed. Twenty-five taxa of rare or endangered vascular plants are reported from a 10-mile radius around the park. Two taxa (Astragalus brauntonii and Dudleya cymosa ssp. ovatifolia) are known to occur at adjacent Topanga State Park, but have not as yet been found at Will Rogers SHP.

3.7.1.1 Chaparral (including Chamise Chaparral and Ceanothus megacarpus Chaparral)

Chaparral is the dominant form of natural vegetation in the park. It is composed of shrubs and low-growing trees, with little herbaceous ground cover.

3.7.1.2 Venturan Coastal Sage Scrub

This community is characterized by more drought-deciduous, lower growing, and less dense vegetation than occurs in chaparral.

3.7.1.3 Riparian Woodland (including Southern Coast Live Oak Riparian Forest)

The bottoms of drainages, whether having permanent or intermittent streams, generally support the most diverse flora and fauna. In the park, riparian habitat occurs only in Rustic Canyon and its immediate tributary drainages.

3.7.1.4 Urbanized Vegetative Areas

These areas are characterized by primarily non-indigenous landscaped ornamental gardens, turf areas, and man-made facilities, introduced by the Rogers’ family and now classified as a contributing historic feature of the cultural landscape resource.
3.7.2 Animal Life

Nearly 140 animal taxa are reported or presumed to occur in the natural and developed areas of the park. These animals are representative of the California Wildlife Region, a region characterized by adaptations to rather dry climatic conditions. The five plant communities in the park do not support a large diversity of animals, and there is considerable overlap in the animals found in each. Although not a biotic community, the developed areas in and outside the park influence the fauna of the unit. Below are brief descriptions of each plant community and the fauna with which it is associated.

3.7.2.1 Fauna Found in Chaparral

Animals living in chaparral tend to be drought-tolerant, adapted to temperature fluctuations, and able to exploit unpredictable food supplies. Typical mammals using this habitat include the Beechey ground squirrel, brush rabbit, Botta pocket gopher, mule deer, bobcat, coyote, gray fox, and long-tailed weasel. Common birds include the California quail, California thrasher, scrub jay, brown towhee, and wrenit; the red-tailed hawk is the principal predator. Common reptiles include the western fence lizard, San Diego gopher snake, and the Southern Pacific rattlesnake.

3.7.2.2 Fauna Found in Venturan Coastal Sage Scrub

Many of the animals found in chaparral are also found in coastal sage scrub. Other common mammals may include the desert woodrat and California mouse; reptiles include the striped racer and San Diego horned lizard; birds include the sage sparrow.

3.7.2.3 Fauna Found in Riparian Woodland

In the park, riparian habitat occurs only in Rustic Canyon and its immediate tributary drainages. In addition to those species found in chaparral and sage scrub habitats, riparian areas also support mammals such as the opossum and raccoon; birds such as the northern oriole, northern flicker, tree swallow, and American goldfinch; reptiles such as the western skink, striped racer and common king snake; and the Pacific tree frog.

3.7.2.4 Fauna Found in Urban Areas

The landscaped gardens, turf areas, and facilities provide habitat for a variety of mammals that may not be common in natural areas of the park. Urban areas favor species that exploit disturbed situations. Common species include the Botta pocket gopher, Beechey ground squirrel, house mouse, European starling, house sparrow and Brewer’s blackbird
3.7.2.5 Endangered, Threatened and Species of Special Interest

No threatened or endangered species are reported to occur in the park. Six species of birds and two reptiles on the Special of Special Interest list may nest or reside in the park, but their status is not documented. These species are the willow flycatcher, yellow warbler, long-eared owl, black-shouldered kite, Cooper’s hawk, golden eagle, San Diego horned lizard, and San Diego mountain king snake.

3.8 Air Quality

Will Rogers SHP lies within a non-attainment area within the greater Los Angeles Basin. Emission sources of air pollution in the vicinity of the park area are primarily human-induced, resulting from primarily from vehicle use rather than industrial or agricultural sources. Occasionally, large wildfires contribute to the diminishment of air quality standards.

3.9 Traffic Circulation

Access to Will Rogers State Historic Park is from Will Rogers State Park Road that connects to Sunset Boulevard, a major arterial road in the City of Los Angeles. The park has 144 formal parking spaces with annual visitation of 260,700. A total of 66,700 vehicles access the park annually, with peak use occurring during weekends and special events.

The Will Rogers State Historic Park General Plan divides the Park into zones of allowable use intensity. In Category I – Low Use Intensity areas, vehicular access is limited to administrative use only. In Category II – Moderate Use Intensity areas, vehicular access is limited to special events by permit or for operational purposes only. There are no vehicular access limitations in Category III – High Use Intensity areas. The Allowable Use Intensity Map in the General Plan provides outlines of each of the respective areas. The proposed Circulation Plan was developed with the intent of the provisions of the allowable use intensity zones in mind. The polo field and most of the Park north of it are either Category I or Category II zones. In order to minimize public vehicular use in these areas, the Circulation Plan proposes routes of travel that will restrict private vehicles to the Category III areas south and west of the polo field. State Park engineers believe that a predominately one-way, counterclockwise traffic flow pattern would best suit the historic experience and circulation needs of park visitors and staff. Specific points of the Circulation Plan are outlined in the plan. Additional discussion on traffic circulation is also found in Section 5.2.6 of this document.
For Figure 3.1 go to: CIRCULATION PLAN.pdf
4 KNOWN CONTROVERSIES

The land that would eventually become known as Will Rogers State Historic Park was donated to the State of California by the Will Rogers family, to serve as a memorial to that renowned American. The gift deed of the property was received via a behest from Betty Rogers that set several conditions requiring the property to be used exclusively as a public park dedicated to the memory of the late Will Rogers. Since the park was gifted in 1944, it has served the public in a variety of uses in addition to its basic purpose and function as a historic site and memorial to Will Rogers. These uses included an equestrian boarding concession, polo club use and tournaments, reservations for large picnic groups, filming activities, and more recently formal recreational uses such as soccer, and other special events. While some of these uses include activities in which Will Rogers actively participated while alive, others were not historic uses. Outside of the historic area, the park consists primarily of natural habitat within the Santa Monica Mountains and connects to Topanga State Park via a trail system.

The 1992 General Plan identifies uses that are appropriate to the Will Rogers memorial and to the historic context of the site as well as the natural history and ecology of the Santa Monica Mountains portion of the park. These include continued polo activities, demonstrations and exhibitions that include equestrian showmanship, environmental studies, a visitor center, self guided tours, interpretive concessions, exhibits and house museums, trail use and staging, picnicking and remaining as a day-use facility only. The 1992 General Plan also identified locations for activities within the park. The Historic Landscape Management Plan primarily follows the General Plan location recommendations. The following exceptions are consistent with the intentions of the General Plan, though they slightly deviate from its details. 1) The maintenance area has been moved to a nearby hollow in order to consolidate maintenance activities in one location and remove maintenance activities from the historic zone and residential area; 2) The visitor center has been slightly relocated from an area near the Polo Field to a site close to but screened from the historic zone; 3) The practice polo arena will be removed and used as a detention area for water quality and as an overflow parking area during dry conditions. (The General Plan indicates that the retention of the practice polo arena could be reassessed in the long-term). This detention basin will serve to alleviate critical water quality issues associated with the drainage of the entire park.

State Parks prepared the Will Rogers SHP: Resource and Management Issues Technical Report in September of 2001. This report found conclusions and made recommendations that indicated that damage was occurring to historic features that could be attributed to the equestrian concession and that State Park’s stewardship obligations toward historic and cultural resources must take precedence over specific use programs. In early 2002, California State Parks terminated the equestrian concession that allowed private equestrian boarding,
due to the damage inflicted on the historic district through the normal wear-and-tear of full-time equestrian use and the detractions that modern equestrian structures were creating within the historic landscape district. This decision was controversial, particularly for those required to find alternative boarding facilities. Although there are alternative sites for equestrian boarding in the greater Los Angeles area within 11 miles, there were no alternative public facilities within the immediate vicinity.

The *Historic Landscape Management Plan* does not strive to resolve the equestrian issues but, instead, strives to protect and restore the historic structures and features at Will Rogers SHP. The equestrian use at Will Rogers SHP is considered an important component of the historic period interpretation. Therefore future equestrian use will be determined in an Equestrian Plan that will be a portion of a Park Interpretive Master Plan. An Equestrian Advisory Committee was established by the Director of California State Parks and has been meeting since February 2002 to make recommendations regarding equestrian uses at Will Rogers SHP. These recommendations include: no horses boarded in the barn, restoration of the historic hay barn and pastures, signage for multi-use trails, and the restoration of Sarah’s Point as an unpaved large area for multiple equestrian uses. The siting of the visitors center outside of Sarah’s Point is compatible with this use and provides for polo staging at the site identified for the visitor’s center in the General Plan.

Additionally, the local community uses the Polo field for soccer and other recreational sports and reserves the picnic areas for large social or cultural events. These uses are not related to the purpose under which the property was gifted to State Parks by the Rogers family. There are many requests from the public for additional active school or recreational sports at the site. However, with the exception of polo, these uses detract from the use of the site as a memorial to Will Rogers and are identified in the General Plan as uses to be eliminated. Noise from soccer games has interrupted interpretive tours and talks and detracts from the overall ambiance. Use of the polo field as an ordinary athletic field encourages use of the parking and picnic facilities by recreational sports enthusiasts intent on non-historic athletic events, thereby detracting from the historic integrity and “sense of place” of the entire historic area. Further, under the Resources Code of the State of California, State Parks is not allowed to develop permanent local recreation facilities.

Portions of the park are located adjacent to residential uses and thus may have use conflicts between the park activities and homeowner privacy, views, and quiet. Particularly during weekends with soccer league play, on holidays, or on special event days, there is traffic congestion in the park and along the park entrance road. When the park is full, visitors have been parking on nearby residential streets reducing parking for the nearby residents, and creating litter and noise problems. The proposed relocation of the maintenance facility will reduce potential proximity effects of park maintenance operations on adjoining neighbors from the site identified in the General Plan but will relocate some uses
from the center of the historic zone to a location that is closer to the adjacent residential areas.

Additionally, the trail system in Will Rogers SHP connects to Topanga State Park and the Santa Monica Mountains Backbone Trail. Multi-use trails have inherent conflicts between hiking, equestrian, and mountain bike users due to the differences in speed, knowledge of trail protocol, and personal interests of the users. The *Historic Landscape Management Plan* does not propose to change the types of use on the trails but the location and design of the trails, parking and equestrian staging will be an issue to each user group due to the limited space available at Will Rogers SHP.
5 ENVIRONMENTAL EFFECTS & MITIGATION

This section describes the probable impacts of the Preferred Alternative. The environmental impact analysis and the proposed mitigation measures are based on preliminary project design and current information and circumstances. Technical reports and analyses, were prepared as part of the environmental studies for the proposed action. These reports analyze existing conditions and identify potential impacts for the Preferred Alternative. This section summarizes the findings of these reports and analyses and incorporates information that may be more current that the information contained in the technical studies. The following studies were conducted for this DEIR: Ranch House / Laundry Historic Structure Report, Hay Barn Historic Structures Report, Stables Historic Structures Report, Architecture Study for Historic Outbuildings, Master Drainage Plan, and a Geotechnical Investigation Report,

5.1 POTENTIALLY SIGNIFICANT EFFECTS/PROPOSED STATEMENT OF OVERRIDING CONSIDERATIONS

This project presents no potentially significant effects that cannot be mitigated. No statement of overriding considerations is needed.

5.2 LESS THAN POTENTIALLY SIGNIFICANT IMPACTS WITH PROPOSED MITIGATION

5.2.1 Historic Resources

**Impact:**
Project actions to preserve, restore, rehabilitate, reconstruct, and provide new uses to structures within the historic landscape district and to improve drainage and support systems in the park may have the potential to adversely effect or substantially change the contributing historical buildings, structures, and cultural landscape features that provide historic integrity to the Will Rogers SHP. Additionally, new uses also may alter use patterns and require additional new structures that could adversely alter the spatial arrangement, setting, and character of the park.

**Discussion:**
The proposed project actions call for numerous improvements to structures, features, and systems in and for the historic district. The project plan also calls for uses that are more compatible with the historic character and preservation goals of the department and park for nearly all the parks’ structures, features, and areas. Project tasks include those for improving circulation, historic structure preservation and adaptation, utility systems, geological stability, site accessibility, and public safety (see Section 2 and Figures 2.1 thru 2.10 for detailed discussion and location of project tasks and improvements).
Structure preservation and adaptation work directed from this plan and project will require undertaking the entire range of historic property treatments (preservation, restoration, rehabilitation, reconstruction) to meet project infrastructure and use goals, tasks, and department and public programs. Factors including historical significance, the amount of existing historic fabric, structural and physical conditions, and proposed adaptive uses, will be used to determine which of these four historic property treatments should be used for a specific structure or landscape feature. Existing cultural resources studies and planning data and documents assembled in this plan will be supplemented with additional information gathered during project implementation tasks. These resources will be used by department cultural resource specialists to determine potential impacts and implement avoidance of such impacts through re-design, achievement of treatments in compliance with the Secretary of the Interior’s Standards and Guidelines for Historic Properties and Cultural Landscapes, and utilization of mitigation measures necessary to reduce impacts to a level below significance.

For all subsequent actions and phases, the Department will use its project planning and project review processes for ensuring compliance with CEQA, PRC 5024.5 and other cultural resource mandates. These reviews are the formal process for implementing cultural resource specialist input and direction into Departmental actions. The review process also implements the Department’s Memorandum of Understanding with the California Office of Historic Preservation in reference to the PRC 5024.5 process. PRC 5024.5 requires state agencies such as California State Parks to consult with the State Historic Preservation Officer (SHPO) on any actions that could affect historical resources. The MOU provides State Parks, due to the presence of qualified cultural resources staff, the authority to review and determine appropriate treatment measures internally. In this way cultural resource preservation guidance is inserted into all department project design and reviews.

Adaptive uses in the historic landscape district also have the potential to create additional use impacts through new regular use. Regular group activities and special events also have the potential to impact structures, features, or areas of the park.

**Mitigation HR-1:**
- All proposed and future work tasks will be designed and implemented in compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties and Cultural Landscapes (Weeks and Grimmer 1995; Birnbaum and Peters 1996). In order to implement the Secretary’s Standards for all actions proposed in this plan, a mitigation program has been outlined to assure that all potential impacts from project improvements and programs will be addressed and treated (see Appendix D, Mitigation Matrix).
- Appropriate historic-style fencing materials will be placed around the construction sites when feasible, to minimize visual impacts during implementation work.
• A recordation and monitoring program will be developed for implementation of
treatments and a preservation maintenance guide for directing on-going work
and programs.
• All uses within the Historic Landscape district, including special events, will be
carefully considered as directed by this Plan and the General Plan, and only
those that will maintain the parks "spirit of place" will be approved.

Finding:
DPR’s cultural resource specialist design input and review processes and the
proposed mitigation program will provide necessary guidance and oversight to
insure that no significant adverse effects or substantial adverse changes to
historical resources will result from the implementation of the HLMP and Phase I
Restoration Project.

5.2.2 Geology and Erosion

Impact:
Due to the project’s hillside location within a fault zone, ground movement is
potentially significant within the entire project site.

Discussion:
Southern California is seismically active, and numerous pre-quaternary faults
occur in and around the park, and damage to structures and danger to human life
from earthquakes could be significant.

Mitigation Geo-1:
• The park’s Emergency Preparedness Plan will reflect the use patterns
recommended in the HLMP, on-site state park rangers will evacuate the
public if necessary, and within the concept of using the least invasive design
while meeting the department’s Mission, structures will comply with
applicable codes, and fixtures will be affixed to walls for safety.

Finding:
While it is not possible to eliminate earthquake hazards, following applicable
standards of industry in construction and the implementation of the park’s
Emergency Preparedness Plan will avert significant preventable risks to the
public.

5.2.3 Hazardous Materials

Impact:
The HLMP and Phase 1 Implementation propose conversion and reconstruction
of structures that is likely to require the removal of hazardous substances.
Additionally, the public routinely visits structures that contain asbestos and lead-
based paints.
Discussion:
Structures on-site are expected to have some asbestos containing materials; lead-based and/or lead containing paints, coatings and or ceramics; ballasts containing PCBs, mercury vapor in light tubes and mercury in thermostat switches; motor oil staining of the soil; and potential organochlorine pesticides. The two methods of lead abatement control practiced in the State, and approved by the Secretary of the Interior’s Standards, are wet film stabilization and abatement. The prior method prepares a lead surface with controlled scraping and wet sanding/washing, and then seals the surface with either a minimum of two coats of latex paint, or a single coat of a specialized material formulated to stabilize lead surfaces. The latter is the complete removal of lead paint by pressure washing. A preferred method is yet to be determined, and a combination of methods may be used on a case-by-case basis according to the type of siding or substrate. The containment of asbestos may be achieved by the placement of new flooring material over existing or removal of the asbestos flooring, depending on the historical significance of the original floor finishing.

Mitigation Hazmat-1:
- All hazardous substances must be contained, cleaned or removed and disposed according to accepted Federal, State, and Local protocols specific to each type of substance. This will reduce the potential impact to a level below significance. Accepted Federal, State, and Local protocols will be followed for the containment, cleaning, removal and disposal of all hazardous substances. A site-specific hazardous material report will be generated prior to or during the working drawing phase.

Impact:
Potentially hazardous materials used with construction equipment could potentially have an adverse effect to humans or the environment in the park.

Discussion:
Construction activities will require the use of certain potentially hazardous materials, such as fuels, oils, and solvents. These materials are generally used for excavation equipment, generators, and other construction equipment and will be contained within vessels engineered for safe storage. Large quantities of these materials will not be stored at the construction site. Spills, upsets, or other construction-related accidents could result in a release of fuel or other hazardous substances into the environment. The following mitigations will reduce the potential for adverse impacts from these incidents to a less than significant level.

Mitigation Hazmat-2:
- All equipment will be inspected for leaks immediately prior to the start of construction, and regularly inspected thereafter until equipment is removed from park premises.
- Contractor(s) will prepare an emergency spill response plan prior to the start of construction and maintain a spill kit on site throughout the life of the project. This plan will include a map that delineates construction
staging areas, where refueling, lubrication, and maintenance of equipment may occur. In the event of any spill or release of any chemical during construction, in any physical form on or immediately adjacent to park property, the contractor will immediately notify the appropriate DPR staff (e.g., project manager or supervisor). Emergency containment procedures will be immediately initiated to prevent contamination of the environment.

- Equipment will be cleaned and repaired (other than emergency repairs) outside the park boundaries. All contaminated water, sludge, spill residue, or other hazardous compounds will be disposed of outside park boundaries, at a lawfully permitted or authorized location.

**Finding:**
The implementation of the above mitigations for the removal of existing hazardous materials within historic structures and the prevention of inadvertent hazardous material contaminations will reduce potential impacts to a level below significance.

### 5.2.4 Noise

**Impact:**
Noise and construction noise may have an adverse impact on sensitive receptors including wildlife, livestock and visitors.

**Discussion:**
Some of the project construction will be very close to sensitive receptors such as park visitors, neighbors and wildlife, and can be quite loud. Park visitation is heaviest on weekends, and construction work will be scheduled for normal workdays. Due to topography and distance, many of the construction activities will not exceed limits comparable to the County’s noise limit of 75dBA where sensitive receptors are located.

**Mitigation Noise-1:**
- Construction activities will be generally limited to daylight hours; alterations in this schedule will be made to address overriding construction considerations or worker safety. No work shall take place on weekends or holidays.
- Internal combustion engines used for any purpose at the job site shall be equipped with a muffler of a type recommended by the manufacturer. Equipment and trucks used for construction will utilize the best available noise control techniques (e.g., ducts, etc.) whenever feasible and necessary.
- Stationary noise sources and staging areas will be located as far from sensitive receptors as possible. If they must be located near sensitive receptors, stationary noise sources will be muffled to the extent feasible and/or, where practicable, enclosed within temporary sheds.

**Finding:**
With the implementation of the above mitigations, any adverse effects from noise will be reduced to a less than significant level.

5.2.5 Hydrology/Water Quality

**Impact:**
Runoff from the new parking lots or hard nonporous areas have the potential to increase water pollution by introducing oil, grease, petroleum hydrocarbons, metals, trash, and sediments.

**Discussion:**
The proposed Visitor Center and Parking Lot will be constructed as shown on Figure 2.8. Parking lots can collect oil, grease, petroleum hydrocarbons, metals, trash, and some sediment. Oil, grease, petroleum hydrocarbons and metals are potentially toxic to aquatic species and wildlife, while trash and sediment can impair natural habitat. The City of Los Angeles requires BMPs for new parking lots having more than 25 spaces or over 5,000 square feet of pavement. Approved BMPs include infiltration trenches, hydrodynamic systems such as oil-water separators, catch basins with filter inserts, biofiltration swales, or water quality ponds that can include sedimentation and filtration.

**Mitigation WQ-1:**
- The proposed development of a new visitor center, relocation of maintenance facilities and paved parking areas will require incorporation of stormwater treatment BMPs to meet City of Los Angeles requirements for water quality. Unpaved parking areas will not need treatment.
- All soil disturbing activities, including grading and excavating, associated with road construction and other construction activities, will be subject to restrictions and requirements set forth in permits. To ensure that the project would not result in adverse effects to water quality due to storm runoff, activities are subject to the requirements of the Clean Water Act and National Pollution Discharge Elimination System (NPDES). State Parks will use Best Management Practices throughout construction to avoid and minimize indirect impacts associated with the proposed project.
- Runoff from paved surfaces will be captured, detained and treated at the stormwater management pond on Sarah’s Point. (An alternative measure, which may be considered, is the use of hydrodynamic separator units.) A biofiltration swale downstream of the units will provide filtration of smaller sediments and petroleum hydrocarbons.
- Upstream runoff will be prevented from entering new paved areas to ensure that the treatment drains are not overloaded.

**Impact:**
The project is located in an area of extreme sensitivity to water quality impacts. Construction and park interpretive/recreational activities may adversely impact water quality.
Discussion:
Will Rogers SHP is within the jurisdiction of the Los Angeles Regional Water Quality Control District. Ground disturbance from project work should be minimal outside existing facility footprints and previously disturbed areas. Additionally, most work will be accomplished during the dry season, further lessening any chance of impact to surface water quality. The project scope does not include waste discharge work of any kind and should not increase or alter existing conditions. Project location, design, and timing, in combination with the mitigation measures indicated above for accidental hazardous material exposure and use of BMPs, should control soil erosion and surface water runoff and insure no water quality standards are violated. This should result in a less than significant impact to water quality and waste discharge. Water application might be required during construction activities (e.g., for dust control), but this demand should be minor and temporary, and should not substantially or permanently affect the groundwater level. Impact to groundwater from this project should be less than significant.

Mitigation WQ-2:
(See Mitigation Hazmat-2)

Finding:
The project will be in compliance with all applicable water quality standards and waste discharge requirements. Any changes to existing drainage recommended by the proposed Master Drainage Plan should improve drainage and will not increase flow or result in increased sedimentation in existing drainages. Proposed mitigations are feasible and sufficient to avoid or reduce potential adverse effects to a level below significance.

5.2.6 Traffic

Impact:
The project proposes to reopen the original entrance to Will Rogers Ranch in order to provide visitors with the historic experience. However, the road is not wide enough to accommodate two-way traffic, nor larger vehicles such as trailers and buses. Widening could impact the historic route. In addition, access to this route could impact traffic flow on Sunset Boulevard.

Discussion:
Will Rogers State Park Road, the access road to the park, is a steep, winding, two-lane paved road that enters from Sunset Boulevard (Blvd.). Private non-historic residential roads dead-end off the park entrance road. Primary travel to the park is now by motor vehicle, principally car, and for the purposes of this document, it is assumed that this will be true in the future. Public transportation is available along Sunset Blvd. at two bus stops; one at each park entrance/exit road, which is a little less than a one mile walk up hill to the main ranch house. Vehicle access to the stables, corrals and pastures is through the primary historic zone of the park, via a historical road. There are no state-provided transportation
services to or in the park. Peak high use on weekends creates hazardous traffic conditions on surrounding residential streets, including vehicle u-turns when the lots are full.

The original entrance road, though highly scenic, does not meet today’s traffic safety requirements, and is currently only used during peak use periods, and as a special events or emergency exit. The HLMP proposes to restore and improve the original road and reestablish it as a one-way entrance road into the park. As the original entrance off of Sunset Blvd. is on a hairpin curve, it will be necessary to install a traffic signal at the intersection to insure vehicular safety. The current entrance road will be used as the park’s exit road as well as entrance.

The project will require an encroachment permit from the California Department of Transportation for several improvements including utilities. This temporary construction is not anticipated to generate significant traffic impacts.

**Mitigation T/C-1:**
- As presented in the Will Rogers State Historic Landscape Management Plan, the historic entrance may be returned to use as a one-way entrance into the Park. For efficient operation, the entrance will be one-way and the intersection with Sunset Boulevard will need to be signalized. Included in the plans for signalization would be the General Plan recommendation for ‘Park Full’ signs readable to traffic on Sunset Boulevard in advance of the entrance intersection. A traffic study will be completed prior to establish a warrant for the signal would be required as noted in preliminary discussions with the City of Los Angeles traffic-engineering department.
- Minimal widening of the historic entrance road will most likely be needed at three curves to provide adequate access for larger vehicles, but such an improvement would be done in accordance with the Secretary of the Interior’s Standards.
- In order to provide equal access to all areas of interest, the Circulation Plan has included 9 stops for a shuttle or tram. Such a service is in keeping with the General Plan. Stops will be provided at the new visitor center parking lot, near the new restroom west of Sarah’s Pasture, near the new restroom east of Sarah’s Pasture, near the existing picnic area, near the hay barn, near the roping corrals, in front of the stables and at the north end of the main ranch house. A new accessible path to the guesthouse will be provided from an elevator or lift located inside the new visitor center.
- Traffic control will be provided by Park operations or event sponsors as needed.

**Finding:**
With the implementation of the above mitigations, any adverse effects from will be reduced to a less than significant level.
5.2.7 Air Quality

Impact:
Project operation and construction has the potential to cause new adverse air quality impacts due to construction activities.

Discussion:
The proposed project is in an air quality non-attainment area. However, the proposed project is consistent with air quality management policies in the current Air Quality Management Plan and its emissions would be below the emissions thresholds established in the South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993.

Potential air quality impacts during construction include fugitive dust from removal and replacement of cottages, grading and emissions from utility engines, generators, and construction vehicles and heavy equipment. Nearby sensitive receptors, such as wildlife, pedestrians or bicyclists may be exposed to blowing dust or odors associated with asphalt paving, depending on the weather and prevailing wind conditions. Standard specifications for construction equipment and processes, including frequent watering and containment of hazardous wastes, will reduce fugitive dust and other emissions below a level of significance.

Mitigation AQ -1:
- The area disturbed by earthmoving equipment or excavation operations shall be minimized at all times. Demolition and earth moving activities shall be limited or redirected during periods of high winds. On-site vehicle speed shall be reduced to 15 mph. Storage piles of material and graded areas shall be either watered twice daily or covered to prevent fugitive dust emissions. Historical ornamental vegetation located within the likely dust drift radius of construction areas shall be periodically sprayed with water to reduce accumulated dust on the leaves as recommended by monitoring biologists in accordance with HLMP construction guidelines. All mechanical equipment shall be operated in compliance with appropriate air quality controls.

Finding:
Proposed mitigation is feasible and sufficient to avoid or reduce potential adverse effects to a level below significance.
5.3 IMPACTS THAT ARE LESS THAN SIGNIFICANT

5.3.1 Aesthetics

Impact:
Although the project will result in an improvement in aesthetic values within the Historic District, there will be temporary adverse impacts associated with construction and minor impacts with road improvements and future kiosk installation.

Discussion:
The Will Rogers SHP has a unique visual ambiance within the spectacular natural and historic setting of the area. Construction within the park, including slope reconstruction and restoration or reconstruction of the historic structures and features will cause substantial disruption within this setting. Although all of the construction and disruption will be temporary in nature, implementation of the HLMP will occur in stages over a period of years.

5.3.2 Public Services/Schools

Impact:
Potential conflicts with public services may occur due to project construction and implementation.

Discussion:
Planning for the proposed projects recommended by the HLMP will be coordinated with the California Department of Transportation (CalTrans), the Los Angeles Water District, and the Los Angeles City Fire Department. As proposed by the project, some main roads within the Historic District will be widened to 20’ to address the Department’s concern regarding the provision of adequate vehicular access. Additionally, fire hydrants including hose boxes will be strategically placed to best support the Department in its fire fighting capacities should such be needed within the Historic District.

The proposed project will not significantly affect operations for the Los Angeles Water District. The entrance road realignment will need encroachment permits and approval from CalTrans. The Department will continue to coordinate with all public services, as needed, throughout the planning and construction of the project.
5.3.3 Recreation

**Impact:**
The recreational use changes proposed in the HLMP could affect equestrian riders, organized sports groups and individual sports enthusiasts by limiting some non-historic recreational activities within the park.

**Discussion:**
Both the approved General Plan and the HLMP recommend, limiting special events, the phase-out of organized soccer, and monitoring the impact of mountain bikes and equestrian use. Proposed landscape restoration activities would remove some facilities previously used for boarding of private horses. The full scope of equestrian activities practiced over the past forty plus years has been evaluated, and only those equestrian uses which are representative of the historic Rogers’ ranch and which are environmentally sound will continue in a limited fashion. Special events that enhance the parks interpretive theme will be encouraged while requests for inappropriate events or organized sporting activities or league sports will be referred to city or county recreational facilities. This issue is covered in more detail in Section 4, Known Controversies.

5.3.4 Land Use & Planning

**Impact:**
The proposed HLMP proposes to make non-substantive changes to proposals in the General Plan.

**Discussion:**
The proposed HLMP is consistent with the Will Rogers SHP General Plan, and only makes minor, non-substantive changes to proposals in the General Plan, which enhance the “spirit of place” within the Historic Landscape District. To enhance the historic viewshed, the HLMP recommends moving the location for the proposed Visitor Center and parking lot from Sarah’s Point and moving the Maintenance Yard out from historic structures to Management Area #7, out of the line of sight for visitors in the primary historic zone. The HLPM also recommends that current residences be utilized for administrative and operational uses instead of the proposed maintenance uses, which would reduce noise levels for neighboring homes during the evening and weekend hours, and will re-establish good will. Additionally, the HLMP recommends that DPR does not continue to allow Bone Canyon to be utilized to pasture up to the previously suggested maximum 45 horses which caused overgrazing, ground water contamination and erosion, but instead advises that the pastures be revegetated and restored to their original condition that existed during the historic period.
5.3.5 Vegetation

**Impact:**
Actions involving the manipulation of vegetation to accommodate a new entrance road kiosk/turnaround, road widening, new stairways, and trails to improve circulation have the potential to affect undocumented special status habitat and sensitive plant species.

**Discussion:**
No rare, endangered or sensitive plants are known to exist in the unit. Grading and disturbance associated with construction will involve the manipulation of vegetation, which could reduce the amount of vegetation. **HLMP** focuses on the protection of habitat and adjacent habitats to address long-term biological protection and management of multiple species. Improvements will affect less than an acre of non-sensitive habitat. Temporarily disturbed areas will be replanted with appropriate plant species, either historic landscape plantings or native vegetation, depending on the historic landscape plan. Best Management Practices will be used for fire management.

5.3.6 Archaeology

**Impact:** Although unlikely, project construction or future projects recommended by the **HLMP** have the potential to adversely affect as yet unknown archaeological resources.

**Discussion:** There are no known archeological sites within Will Rogers State Park.

5.4 Effects with Little or No Impacts

Additionally, the project will not adversely affect cultural resources, agriculture, energy and mineral resources, agriculture, utilities, local plans, or employment.

5.5 Beneficial Effects

5.5.1 Public Park & Recreation

Approval and full implementation of the **Historic Landscape Management Plan** and its recommendations will preserve cultural and natural resources and benefit the public, particularly in the following areas:

- Aesthetics: the public will be able to experience the ranch the way it was during Will Rogers time, as day-to-day park operations will be removed and better hidden from view, and modern vehicles will not have an intrusive
impact on the historic viewshed. Modern sounds and unnatural lighting will decrease with the reduction in inappropriate events and activities, benefiting both the visiting public and adjacent homeowners.

- Traffic/circulation: Traffic safety and circulation will improve with the reconstruction of the historic road and the entrance experience enhanced. The permitting of fewer, more appropriate special events somewhat alleviates the problem of street parking occurrences.

- Historic interpretation: Interpretation will significantly improve with the complete restoration of the historic landscape, re-opening of the historic entrance to the ranch, and the increased public access to interpretive equestrian activities and historic structures.

- Recreation: Current public recreational opportunities in this area are limited due to the lack of local community parks and the nature of this residential community. The proposed project would fully open a greater area of the historic park to general public use, and will serve the local community, the region, and visitors as a unique recreational opportunity for historic interpretation within a National Register Historic Landscape District, with pristine natural resources located in the immediate area. The cultural importance of the natural and historic resources at the ranch, and the impact Will Rogers made on the American society, can be imparted to a great variety of people using the unique structures available in the park.

5.6 ENVIRONMENTAL ALTERNATIVE ANALYSIS

5.6.1 No Project Alternative

The No Project Alternative would continue the status quo. The State Park operations would continue within historic structures and hasten deterioration. Not all the historic structures in the park would be available the public. The story of Will Rogers’ contribution to American culture would be told, but the historic ambiance would be hampered by non-historic activities and lack of access to pertinent structures to facilitate adequate interpretation. Those buildings not identified for operations would be destabilized through inaction, and the drainage/erosion problems would continue.

5.6.2 Environmentally Superior Alternatives

The range of alternatives discussed in Section 2.3 was chosen based on public comment received during public meetings in the development and planning of the HLMP. These alternatives represent both large and small-scale concepts. For the most part, the Preferred Alternative incorporates the best compromise of reducing impacts to natural and cultural resources while providing the public with the opportunity to fully utilize the Historic Landscape District, in accordance with the General Plan.
According to CEQA guidelines (Sec. 15126.6 c & f), only those alternatives that could feasibly accomplish the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects are required to be analyzed in detail. For this project, there are alternatives that are superior from a natural resource standpoint but would cause significant adverse impacts to historic resources and vice versa. The only Alternatives that would be environmentally superior for both natural and cultural resources are: 1) the elimination of all non-historical uses (soccer, special events, etc) within the park, 2) the elimination of horses from the park, and 3), non-compliance with the American with Disabilities Act. These alternatives, however, are not feasible or reasonable as #3 would not meet current code, and the elimination of horses and some special events and recreational uses would not meet the educational and recreational needs of the public and would negate the “Spirit of Place” of Will Rogers SHP. This would violate intent of the Rogers family in granting the property to the State.
6 CEQA REQUIRED CONSIDERATIONS

6.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH CANNOT BE AVOIDED

The project will restore the park to reflect it’s historic use during Will Roger’s lifetime as the period of significance per the park’s General Plan. State Parks intends to make the Will Rogers SHP accessible for the education and enjoyment of the public through appropriate restoration and management of the grounds within the park. Since the project area is within a Historic Landscape District, many historic structures and features have the potential to be impacted through project implementation. However appropriate mitigation measures will be implemented to avoid such impacts. As such there should be no significant irreversible environmental changes which cannot be avoided.

6.2 RELATIONSHIP OF LOCAL SHORT-TERM USES AND MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The Historic Landscape Management Plan provides the permanent long-term site and grounds management envisioned in the Will Rogers SHP General Plan. The long-term use of the project site for public park use will provide a unique opportunity to the local community, region, and vacation travelers to enjoy the ambiance of Will Rogers SHP while protecting the unique historic resources and providing a memorial to Will Rogers. This long-term use will be flexible in its application of the uses at the park while firm in its commitment to protect the natural and cultural resources present on site. Local short-term uses, such as recreational, cultural or sporting events not related to the park purpose, may be discontinued.

6.3 GROWTH INDUCING IMPACTS

There will be little or no growth inducing impacts because the project does not create new housing or provide infrastructure to support new residential, commercial or industrial development. Program uses at the park will increase educational and recreational opportunities for the public while protecting natural and cultural resources. These opportunities will improve the existing educational and recreational opportunities by providing a unique, attractive experience to the public. The proposed project will provide protection of a valued historic site, but does not contribute to growth in nearby communities as a park improvement.

6.4 CUMULATIVE IMPACTS

All projects listed below support the protection of the park’s significant resources and do not result in cumulative impacts that would be considered significant.
Recently completed projects:

- Installation of insulation & moisture barrier and moisture reduction system at Ranch House (DMP#915-98-00264 and 00265)
- Repair of Historic Flagstone Porch and walkway (DMP#915-98-00260)

Currently in progress:

- Restoration of historic Ranch House

Proposed:

- All proposed projects are outlined in the HLMP
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7.1 LIST OF PREPARERS AND REVIEWERS

Patricia K. Autrey, Staff Services Manager, A.A. Governmental Administration, 25 years experience in park planning and management, 1 ½ years experience in environmental studies. Southern Service Center

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Karen Miner, Senior Resource Ecologist, B.S. Environmental & Systematic Biology, M.S. Ecology, Ph.D. Candidate Ecology, 14 years experience as a wildlife biologist in the southern California region, 12 years experience in park planning and management. Southern Service Center.

Jim Newland, State Historian III (senior level), B.A. Social Sciences (history & geography emphasis), M.A. Public History, 11 years experience in cultural resource management. Southern Service Center.

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Crystal Silva, Student Assistant, Auto CAD, 2 years experience at California Parks and Recreation. Southern Service Center.

Robert Shore, Project Manager, Southern Service Center.

Darren Smith, Associate Resource Ecologist, Southern Service Center.

Howard Teaze, Senior Delineator, B.S. Landscape Architecture, 15 years commercial landscape and irrigation design and installation. 4 years AutoCAD. Southern Service Center.

Steve Van Wormer, State Historian II, M.A. history, 25 years experience in cultural resource management. Southern Service Center.

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• “Will Rogers State Historic Park Hay Barn,” 10/1989
• “Will Rogers State Historic Park Blacksmith and Carpenter Shop,” 0/1989
• “Will Rogers State Historic Park Chimney of the cabin,” 10/1989
• “Will Rogers State Historic Park-Hay Barn,” no date, drawn by Tom Winter
• “Will Rogers State Historic Park Practice Polo Field Fence,” no date
• “Drainage Map, Resource Inventory,” (also present “Slope Map, Soils Map, Aspect Map, Contour Map, Geology Map”) no date
• “Topography Survey Rivas Canyon Area adjacent to lands of Didier,” no date
• “Will Rogers State Historic Park – Ownership map” no date

7.6 WEBSITES VISITED

• http://www.scecdc.scce.org/monica.html - earthquake fault zones
• http://www.consrv.ca.gov - earthquake fault zones
• http://www.seeing-stars.com/live/WillRogersPark.shtml - General Info
• http://www.vhoa.org/resources/organizations.htm - equestrian information
• http://www.vhoa.org/resources/government.htm - local legislators
• http://www.gotorec.org/WillRogers.cfm - equestrian information
• http://www.lacity.org - census, air quality, traffic circulation
• http://www.losangelesalmanac.com - demographics, general info
APPENDICES

A NOTICE OF PREPARATION, INITIAL STUDY, & RESPONSES

B NATIVE PLANTS TABLE

C AREA PLANTS SURVEY TABLE

D MITIGATION MONITORING & REPORTING PROGRAM
APPENDIX A

NOTICE OF PREPARATION
INITIAL STUDY
&
RESPONSES
NOTICE OF PREPARATION

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 below.

**Project Title:** Will Rogers State Historic Park Historic Landscape Maintenance Plan and Restoration

**Project Location:** Los Angeles County

Will Rogers State Historic Park is a approximately 187.5 acre unit within the Topanga Sector of the Angeles District of the California State Park System, and is located between Pacific Palisades and Brentwood on Sunset Boulevard, about three miles southeast of Pacific Coast Highway. The park is a thirty-minute drive from downtown Los Angeles, and only minutes away from Will Rogers and Topanga State Beaches to the south, and Topanga and Malibu State Parks to the north and west.

**Project Description**

The Department of Parks and Recreation (DPR) proposes to address critical infrastructure and resource management deficiencies at Will Rogers SHP through the completion and implementation of a comprehensive management plan for the National Register of Historic Places “Will Rogers Historic Landscape District” property. This plan (and subsequent project actions) will provide for the identification, evaluation, and treatment of the historic landscape structures, features, and elements at Will Rogers SHP. The management plan is the culmination of a multi-year study involving a diverse array of professional park and cultural resource specialists, park users, and community members. The plan includes treatment and implementation recommendations for the preservation, restoration, rehabilitation, and reconstruction of the Historic Landscape District structures, features, and elements. It also includes various other studies including those for overall park operations, site drainage, fire management, and interpretive programming.

Funding is also available for immediate implementation of several plan actions, including:

- Replanting of historic ornamental vegetation in Management Plan Areas 1, 2, & 3
- Stabilization of the historic Hay Barn structure
- Phase I “aesthetic” restoration for the historic Stable.
- Restoration of the historic Carpenter Shop structure.
- Cosmetic restoration of the historic Guest House,
- Restoration of a historic rock wall between the Ranch and Guest Houses
- Implementing the first phase of the Master Drainage Plan
**Possible Environmental Effects**
The project may have potential effects on air quality, water quality, drainage, erosion, recreation, public safety, transportation, noise, aesthetics, and historical resources. By establishing a clear landscape management plan, goals and guidelines, the Department will endeavor to identify broad level avoidance and mitigation measures and policies to reduce the potential impacts of future projects and activities to a level below significance. However, additional environmental review will be conducted as necessary, when subsequent phases of the plan are proposed for implementation.

**Public Involvement, Plan Development and Environmental Review**
Public involvement in the development of this Historic Landscape Management Plan was sought through focused workshops involving interest groups and subject experts in equestrian recreation, interpretation, drainage, historic preservation, historic landscape, and collections management. Once written and prepared the Historic Landscape Management Plan, first phase restoration activities, and the Environmental Impact Statement will be made available for public review and comment in accordance with the California Environmental Quality Act (CEQA). The Historic Landscape Management Plan and first phase activities will then be refined, and responses to public comments prepared. The Historic Landscape Management Plan and restoration project plan will then be presented along with public comments, and responses to comments, to the California State Parks and Recreation Commission for approval at a public hearing. Subsequent site-specific actions will be designed in conformance with the approved Historic Landscape Management Plan and reviewed per CEQA guidelines, as funding becomes available.

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 in connection with the proposed project. Your response must be sent to the address below not later November 14, 2002, the close of the Notice of Preparation review period. We would appreciate the name of a contact person in your agency or organization.

**DEPARTMENT OF PARKS AND RECREATION CONTACT PERSON**

**Patricia K. Autrey**  
California Department of Parks and Recreation  
Southern Service Center  
8885 Rio San Diego Drive, Suite 270  
San Diego, CA 92108

(619) 220-5300  
pautr@parks.ca.gov
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. A source list should be appended to this document. Sources used or individuals contacted should be listed in the source list and cited in the discussion.

8. 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.
**PROJECT INFORMATION**

1. **Project Title:** Historic Landscape Management Plan and Restoration
2. **Lead Agency Name & Address:** California Department of Parks and Recreation
3. **Contact Person & Phone Number:** Patricia K. Autrey, Environmental Coordinator (619) 220-5300
4. **Project Location:** Will Rogers State Historic Park
5. **Project Sponsor Name & Address:** Angeles District - Topanga Sector Office
   California Department of Parks & Recreation
   15-1 Will Rogers State Park Road
   Pacific Palisades, California 90272
6. **General Plan Designation:** State Historic Park
7. **Zoning:** Open Space (O-S) & Recreation (R)
8. **Description of Project:**

   The Department of Parks and Recreation (DPR) proposes to address critical infrastructure and resource management deficiencies at Will Rogers SHP through the completion and implementation of a comprehensive management plan for the National Register of Historic Places “Will Rogers Historic Landscape District” property. This plan (and subsequent project actions) will provide for the identification, evaluation, and treatment of the historic landscape structures, features, and elements at Will Rogers SHP. The management plan is the culmination of a multi-year study involving a diverse array of professional park and cultural resource specialists, park users, and community members. The plan includes treatment and implementation recommendations for the preservation, restoration, rehabilitation, and reconstruction of the Historic Landscape District structures, features, and elements. It also includes various other studies including those for overall park operations, site drainage, fire management, and interpretive programming.

   Funding is also available for immediate implementation of several plan actions, including:
   - Replanting of historic ornamental vegetation in Management Plan Areas 1, 2, & 3
   - Stabilization of the historic Hay Barn structure
   - Phase I “aesthetic” restoration for the historic Stable.
   - Restoration of the historic Carpenter Shop structure.
   - Cosmetic restoration of the historic Guest House,
   - Restoration of a historic rock wall between the Ranch and Guest Houses
   - Implementing the first phase of the Master Drainage Plan

9. **Surrounding Land Uses/Setting:** Urban and park land, within the Santa Mountains National Recreation Area
10. **Approval Required from Other Public Agencies:** The project may require consultation with the Office of Historic Preservation prior to the start of construction.
1. **ENVIRONMENTAL FACTORS POTENTIALLY Affected:**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact", as indicated by the checklist on the following pages.

<table>
<thead>
<tr>
<th>Aesthetics</th>
<th>Agricultural Resources</th>
<th>Air Quality</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biological Resources</td>
<td>Cultural Resources</td>
<td>Geology/Soils</td>
</tr>
<tr>
<td>Hazards &amp; Hazardous Materials</td>
<td>Hydrology/Water Quality</td>
<td>Land Use/Planning</td>
</tr>
<tr>
<td>Mineral Resources</td>
<td>Noise</td>
<td>Population/Housing</td>
</tr>
<tr>
<td>Public Services</td>
<td>Recreation</td>
<td>Transportation/Traffic</td>
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<tr>
<td>Utilities/Service Systems</td>
<td>Mandatory Findings of</td>
<td></td>
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<tr>
<td></td>
<td>Significance</td>
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</tbody>
</table>

**DETERMINATION**

On the basis of this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment and a **NEGATIVE DECLARATION** will be prepared.

- I find that, although the original scope of the proposed project **COULD** have had a significant effect on the environment, there **WILL NOT** be a significant effect because revisions/mitigations to the project have been made by or agreed to by the applicant. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

- I find that the proposed project **MAY** have a significant effect on the environment and an **ENVIRONMENTAL IMPACT REPORT** or its functional equivalent will be prepared.

- I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated impact" on the environment. However, at least one impact has been adequately analyzed in an earlier document, pursuant to applicable legal standards, and has been addressed by mitigation measures based on the earlier analysis, as described in the report's attachments. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the impacts not sufficiently addressed in previous documents.

- I find that, although the proposed project could have had a significant effect on the environment, because all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration, pursuant to applicable standards, and have been avoided or mitigated, pursuant to an earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, all impacts have been avoided or mitigated to a less-than-significant level and no further action is required.

Patricia K. Autrey  
Environmental Coordinator - Southern Service Center  
Date
ENVIRONMENTAL (Initial Study) CHECKLIST

I. AESTHETICS.

WILL THE PROJECT:

<table>
<thead>
<tr>
<th></th>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION IMPACT</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>a)</td>
<td>Have a substantial adverse effect on a scenic vista?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b)</td>
<td>Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c)</td>
<td>Substantially degrade the existing visual character or quality of the site and its surroundings?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>d)</td>
<td>Create a new source of substantial light or glare which will adversely affect day or nighttime views in the area?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

DISCUSSION

a) The proposed projects should not hinder accessibility to or block visibility of scenic or the historic viewshed. Construction activities may have a limited temporary impact on the viewshed, but obstructions should be extremely limited and of brief duration. There should not be any long-term or permanent negative impact to the existing scenic or historic vista; rather restoration of the historic landscape and historic structures should improve the historic ambiance and aesthetics. Therefore, the project should have a less than significant impact.

b) The park unit is not adjacent to a state highway within viewing distance of the project location. Therefore, there should be no impact from this project.

c) The proposed historic landscape restoration is designed to enhance the historic accuracy and ambiance of the park, and should substantially improve the scenic vista.

As with any construction project, there may be some temporary decrease in the visual appeal of the area immediately affected by the work being performed. However, the duration of the structural work in any one area should be limited and overshadowed by the improvements to safety and recreational and/or educational use that will result from the proposed project. The rehabilitation of historic landscaping should improve park appearance, and aid interpretation of this historic site, allowing visitors to “step back in time.” Therefore, the impact from this project should be less than significant.

d) No substantial changes in lighting are planned as a result of this project. No impact.

II. AGRICULTURAL RESOURCES.

WILL THE PROJECT*:

<table>
<thead>
<tr>
<th></th>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION IMPACT</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>a)</td>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>
WILL THE PROJECT*:

b) Conflict with existing zoning for agricultural use or a Williamson Act contract? ☃ ☃ ☃ ☒
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? ☃ ☃ ☃ ☒

* 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.

DISCUSSION

a-c) Will Rogers State Historic Park does not contain any agricultural operations or farmland. None of the land within the park, or areas impacted by the proposed projects are included in any of the Important Farmland categories, as delineated by the California Department of Conservation, under the Farmland Mapping and Monitoring Program (FMMP). This project contains no component that should have an effect on any category of California Farmland, conflict with any existing zoning for agricultural use or Williamson Act contract, or interfere with the use or result in the conversion of agricultural land to a non-agricultural use.

III. AIR QUALITY.

WILL THE PROJECT*:

a) Conflict with or obstruct implementation of the applicable air quality plan or regulation? ☃ ☃ ☃ ☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? ☃ ☒ ☃ ☒
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)? ☃ ☒ ☃ ☒
d) Expose sensitive receptors to substantial pollutant concentrations (e.g., children, the elderly, individuals with compromised respiratory or immune systems)? ☃ ☒ ☒ ☒
e) Create objectionable odors affecting a substantial number of people? ☃ ☒ ☒ ☒

* Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make these determinations.
DISCUSSION

a) Work proposed in this project is not in conflict with, or will not obstruct, implementation of any applicable air quality plan for Los Angeles County or the Los Angeles Air Basin. No impact.

b,c) Excavation and grading activities associated with construction of the proposed facilities may result in surface disruption and operation of diesel-powered construction equipment emit ozone precursor emissions. Construction vehicle trips for all of the facility improvements will occur via paved roads, minimizing dust generation during truck trips. In addition, all disturbed areas will be restored following construction.

The proposed project consists of historic property treatments for existing historic facilities and historic landscape elements, with no substantial change in purpose or capacity; therefore, the project should not introduce any new air emissions associated with fossil fuel combustion or particulate matter. The project is not anticipated to result in a significant increase in park visitors or employment. The continued operation of the rehabilitated facilities should not result in a violation of any air quality standard or contribute substantially to an existing, projected, or cumulative air quality violation and the proposed project should not emit air contaminants at a level that, by themselves, would violate any air quality standard, or contribute to a permanent or long-term increase in any air contaminant.

However, project construction could generate short-term emissions of fugitive dust ($\text{PM}_{10}$) and involve the use of equipment and materials that might emit ozone precursors (i.e., reactive organic gases [ROG] and nitrogen oxides, or NOx). Increased emissions of $\text{PM}_{10}$, ROG, and NOx could contribute to existing nonattainment conditions and interfere with achieving the projected attainment standards. Consequently, construction emissions should be considered a potentially significant short-term adverse impact.

d) As noted in III(b,c) Discussion above, project construction could generate dust and equipment exhaust emissions for the duration of the project. No residences are located on the project site. All work will be confined within park boundaries and no traveler will be required to pass through the construction area to traverse the area, although park visitors could be temporarily inconvenienced. In most areas, public use could occur immediately adjacent to construction areas. These conditions reduce any potential adverse impact to a less than significant level.

e) The proposed work should not result in the long-term generation of odors. Construction-related emissions might result in a short-term generation of odors, including diesel exhaust, fuel vapors, and evaporative emissions from asphalt paving materials. Some park visitors and employees might consider these odors objectionable. However, because construction activities would be short-term; odorous emissions will dissipate rapidly in the air, with increased distance from the source; and visitor exposure to these odors will be extremely limited [see (d) above], potential odor impacts should be considered less than significant.
### IV. BIOLOGICAL RESOURCES.

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<th>POTENTIALLY SIGNIFICANT IMPACT</th>
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<th>LESS THAN SIGNIFICANT IMPACT</th>
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</table>

**WILL 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? ```

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? ```

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? ```

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? ```

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? ```

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? ```

**DISCUSSION**

a) All proposed improvements are within developed areas, and all construction activities (including access to these sites) will be confined within existing disturbed areas, roads, and trails. No native habitat will be removed. No negative impacts to native plant communities, or rare plant taxa are anticipated. Some species of “Special Interest” may reside in the park, but their status has not been documented. Nevertheless, there is a potential that temporary construction noise levels from the use of heavy equipment may exceed ambient noise levels and could disturb birds or wildlife adjacent to the project site. Design measures are incorporated into the project to reduce negative impacts to wildlife.

b) Intermittent riparian habitat is located within the park. However, no work is proposed within any riparian habitat. The proposed improvements are confined to the existing developed or disturbed areas. Historic ornamental and native plants will be used as landscaping in historical sites. Therefore, there should be a net increase of historical and native plants in the landscape areas. Therefore, impacts from the proposed project should be less than significant.
c) No federally protected wetlands are present within the vicinity of the project site and all project activities occur in upland habitat in currently disturbed or developed areas. No impact.

d) The proposed project should not interfere with the movement of 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.

e,f) The project is consistent with all conservation plans, policies, or ordinances that apply to the project area.

V. CULTURAL RESOURCES.

<table>
<thead>
<tr>
<th>Will the Project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
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<tbody>
<tr>
<td>a)</td>
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<td>b)</td>
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<td>c)</td>
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DISCUSSION

- Project proposes to preserve, restore and reintroduce contributing features of the National Register property at Will Rogers SHP. This will enhance the integrity of all historic landscape features, elements, and/or structures. In addition, non-compatible operational features and uses will be removed from the historic district and relocated or eliminated. As such the overall project should have no adverse impacts, but rather will enhance the integrity and stewardship of historical resources.

- There are no known archaeological resources within the project sites. No impact.

- There are no known burial sites within the park. No impact.

VI. GEOLOGY AND SOILS.

<table>
<thead>
<tr>
<th>Will the Project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
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<tbody>
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<td>a)</td>
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<tr>
<td>i)</td>
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WILL THE PROJECT:

(Refer to Division of Mines and Geology Special Publication 42.)

<table>
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<tr>
<th>WILL THE PROJECT:</th>
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<th>SIGNIFICANT IMPACT WITH MITIGATION</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
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</thead>
<tbody>
<tr>
<td>ii) Strong seismic ground shaking?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>iii) Seismic-related ground failure, including liquefaction?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>iv) Landslides?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b) Result in substantial soil erosion or the loss of topsoil?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>c) Be located on a geologic unit or soil that is unstable, or that will become unstable, as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>f) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
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DISCUSSION

a) The project locations lay within a seismically active region subject to the effects of moderate to large earthquake events along major faults, as defined by the State of California Department of Conservation, California Geological Survey (formerly known as the Division of Mines and Geology). However, ground rupture is typically associated with moderate to severe earthquakes occurring along active fault lines. The most recent surface rupture for the Santa Monica Fault, underlying the park, was in the Late Quaternary period, and only has a slip rate of 0.27/0.39 mm/yr.

The project sites could experience a range of ground shaking effects during an earthquake on one of the aforementioned faults. This ground shaking could cause secondary ground failure, such as differential settlement. Secondary ground failures could cause structural damage to buildings, placing people in risk of injury.

Liquefaction potential is highest in the areas underlain by fills or mud, and unconsolidated saturated alluvium subject to peak ground accelerations of 0.07g or greater. Based upon available information, the level of liquefaction hazards at the proposed facility locations should be low to moderate.
While the chance of the rupture of a known earthquake fault, strong seismic ground-shaking, seismic-related ground failure, or landslides are certainly possible in this area, this project should not substantially increase the exposure of people or structures to risk of loss, injury, or death as a result of these events. Although those working on the project may be exposed to any event that might occur, exposure for most of those working on the project should be similar whether working on the project or simply living and working in the area.

b) The potential exists for loss of soil during the planned grading and/or excavation, landscaping, and revegetation. The use of Best Management Practices should reduce potential impacts to a less than significant level.

c) The sites are in a sloping area which have been graded and are generally flat, and were engineered to support previously existing structures and facilities, though some structures have been partially constructed over fill which has compacted and caused cracking. Impacts should be less than significant.

d) The soils are not considered "expansive" in the project areas; as noted above any evident damage was attributed to compaction, not expansion. Representative soil samples were collected and tested in a Geotechnical investigation of the historic area, and more are recommended during the working drawings and pre-construction phase of the project to determine if any project areas are underlain by expansive soils. If expansive soils are found, project design will be adapted to stabilize or remove the problematic soils.

e) Not applicable. No impact.

f) There are no known unique paleontological resource or site or unique geologic features within the proposed project areas. No impact.

VII. HAZARDS AND HAZARDOUS MATERIALS.

<table>
<thead>
<tr>
<th>WILL THE PROJECT:</th>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>
Will the project:

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, will the project result in a safety hazard for people residing or working in the project area?

f) Be located in the vicinity of a private airstrip? If so, will the project result in a safety hazard for people residing or working in the project area?

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

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?

Discussion

a,b) It has been determined that the historic buildings at Will Rogers have detectable quantities of hazardous materials (lead in paint, asbestos). Additionally, construction activities may require the use of certain potentially hazardous materials, such as fuels, oils, and solvents. These materials are generally used for excavation equipment, generators, and other construction equipment and maybe contained within vessels engineered for safe storage. Large quantities of these materials would not be stored at the construction site. Spills, upsets, or other construction-related accidents could result in a release of fuel or other hazardous substances into the environment. Best Management Practices should reduce the potential for adverse impacts from these incidents to a less than significant level while still preserving historical character and integrity through implementation of the Secretary of the Interior’s Standards and Guidelines for such health and safety requirement treatments.

c) There are no schools or proposed schools within one-quarter mile of the project site. Therefore, this section does not apply to this project. No impact.

d) Will Rogers State Historic Park is not included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5. Therefore, no impact should occur with project development.

e,f) Will Rogers SHP is not located within an private airport land-use plan, or within two miles of a public airport or public-use airport. Therefore, no impact should occur as a result of this project.

g) All construction activities associated with the project are planned to occur within the boundaries of the park and work should not restrict access to or block any public road. All areas within the park should remain open to the public during the construction process, although minor closures may occur at each project site during planned work. Minimum access requirements for emergency vehicles will be maintained at all times. Therefore, the
impact of this project on an emergency response or evacuation plan should be less than significant

h) Although the project is confined to previously disturbed public spaces and landscaped areas, the vegetation in the park could contain significant amounts of annual grasses that become highly flammable during the dry season (June-October). Heavy equipment can get very hot during the warmer part of the work season. Improperly outfitted exhaust systems or friction between metal parts crushing rocks could generate sparks. Though this equipment is not expected to be in close proximity to combustible vegetation, the Historic Landscape Maintenance Plan contains a Fire Management element to deal with such contingencies. The project should not add any new uses that could create additional long-term or permanent increased fire risks. The potential for adverse impacts from this project is less than significant.

VIII. HYDROLOGY AND WATER QUALITY.

<table>
<thead>
<tr>
<th>WILL THE PROJECT:</th>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Violate any water quality standards or waste discharge requirements?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, such that there will 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 will drop to a level that will not support existing land uses or planned uses for which permits have been granted)?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>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 will result in substantial on- or off-site erosion or siltation?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>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 will result in on- or off-site flooding?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>e) Create or contribute runoff water which will exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>f) Substantially degrade water quality?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>h) Place structures that will impede or redirect flood flows within a 100-year flood hazard area?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>
WILL THE PROJECT:

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?  
☐ ☐ ☐ ☑

j) Result in inundation by seiche, tsunami, or mudflow?  
☐ ☐ ☐ ☑

DISCUSSION

a) Will Rogers SHP is within the jurisdiction of the Los Angeles Regional Water Quality Control District (LARWQCD). The project will be in compliance with all applicable water quality standards and waste discharge requirements. Any changes to existing drainage recommended by the proposed Master Drainage Plan should improve drainage and will not increase flow or result in increased sedimentation in existing drainages. Ground disturbance from project work should be minimal outside existing facility footprints and previously disturbed areas. Additionally, most work will be accomplished during the dry season, further lessening any chance of impact to surface water quality. The project scope does not include waste discharge work of any kind and should not increase or alter existing conditions. Project location, design, and timing, in combination with the mitigation measures indicated above for accidental hazardous material exposure and use of Best Management Practices, should control soil erosion and surface water runoff and insure no water quality standards are violated. This should result in a less than significant impact to water quality and waste discharge.

b) Water application might be required during construction activities (e.g., for dust control), but this demand should be minor and temporary, and will not substantially or permanently affect the groundwater level, as the park receives water supplies from the City of Los Angeles. No impact.

c) Some alteration of existing drainage patterns will be a part of this project in order to restore historic drainage patterns and decrease storm water erosion, and improve overall drainage in the historic core. However, alteration to historic drainage patterns should be minimal. The use of Best Management Practices should reduce any potential impact to a less than significant level.

d) See VIII(c) Discussion above. This project should not alter drainage patterns in a manner that could result in on- or off-site flooding. Some redirection of storm water runoff may occur as erosion problems and inadequate drainage systems are corrected, but any potential runoff impacts should be less than significant.

e) See VIII(c) Discussion above. Less than significant impact.

f) See VIII(a) Discussion above. Project as designed should have no impact.

g) This project does not include the construction of housing. No impact.

h) See VIII(g) discussion above. No impact.
i) Any construction is not expected to occur during rain events, when overflow from streams in the hills, though highly unlikely, might occur during heavy downpours. No impact.

j) See VIII(i) discussion above. No impact.

IX. LAND USE AND PLANNING.

<table>
<thead>
<tr>
<th>WILL THE PROJECT:</th>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Physically divide an established community?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>c) Conflict with any applicable habitat conservation plan or natural community conservation plan?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

DISCUSSION

a) While Will Rogers SHP lies in the middle of Pacific Palisades and adjacent to Brentwood, the project would not divide an established community as all work is to be done within the boundaries of the state park. No impact.

b) This project is consistent with all applicable state and local land use plans, policies, and regulations. Some of the proposed projects may require changes to the Will Rogers State Historic Park General Plan before they could be implemented. Less than significant impact.

c) The proposed project is consistent with the requirements of the Will Rogers Deed to the State of California, and the park’s classification under the Public Resources Code. No impact.

X. MINERAL RESOURCES.

<table>
<thead>
<tr>
<th>WILL THE PROJECT:</th>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Result in the loss of availability of a known mineral resource that is or will be of value to the region and the residents of the state?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>
DISCUSSION

a) No known mineral resources of local or regional importance have been identified in the park by the Mineral Land Classification Program, administered by the California Department of Mines and Geology. Therefore, no loss of mineral resources should occur as a result of the proposed project. No impact.

b) The project site has not been classified or nominated as a locally important mineral resource recovery site. No impact.

XI. NOISE.

<table>
<thead>
<tr>
<th>WILL THE PROJECT:</th>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b) Generate or expose people to excessive groundborne vibrations or groundborne noise levels?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>c) Create a substantial permanent increase in ambient noise levels in the vicinity of the project (above levels without the project)?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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, will the project expose people residing or working in the project area to excessive noise levels?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>f) Be in the vicinity of a private airstrip? If so, will the project expose people residing or working in the project area to excessive noise levels?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

DISCUSSION

a) Construction noise levels at and near the project area may fluctuate, depending on the type and number of construction vehicles operating at any given time. There are no noise-sensitive land uses located in the vicinity of the project site that may be substantially affected by the proposed construction-related activities. However, depending on the specific construction activities being performed, short-term increases in ambient noise levels could result in speech interference near the project site and a potential increase in annoyance to visitors in other areas of the park. As a result, construction-generated noise might be considered to have a potentially significant short-term impact to nearby noise-sensitive receptors (e.g., park visitors). Implementation of Best Management Practices should reduce those potential impacts to a less than significant level.
b) Construction activity will not involve the use of explosives, pile driving, or other intensive construction techniques that could generate significant ground vibration or noise. Minor vibration immediately adjacent to paving equipment should only be generated on a short-term basis. Therefore, ground-borne vibration or noise generated by the project should have a less than significant impact.

c) Once the proposed project is completed, all related construction noise will disappear. Nothing within the scope of the proposed project should result in a substantial permanent increase in ambient noise levels. The project’s primary emphasis is to repair and improve existing facilities, resulting in negligible expansion of use beyond current levels. Therefore, no impact to permanent ambient noise levels is anticipated.

d) See XI(a) Discussion above. Best Management Practices should reduce noise to a less than significant impact.

e,f) The project area is not located within an private airport land-use plan, or within two miles of a public airport or public-use airport. Therefore, no impact should occur as a result of this project.

XII. POPULATION AND HOUSING

<table>
<thead>
<tr>
<th>WILL THE PROJECT:</th>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>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)?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

DISCUSSION

a,b,c) Work proposed by this project is designed stabilize, preserve, and restore historic structures, features, and elements of the Will Rogers Historic Landscape District while appropriately situating and developing operational and interpretive facilities that will better accommodate visitors. The project will not have a housing component, will neither modify or displace any existing housing either temporarily or permanently, and all work be conducted using Best Management Practices and will take place within the confines of the park boundaries, with no additions or changes to the existing local infrastructure. No impact.
XII. PUBLIC SERVICES.

**WILL THE PROJECT:**

<table>
<thead>
<tr>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>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:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fire protection?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>Police protection?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>Schools?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>Parks?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>Other public facilities?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

**DISCUSSION**

a) As the project is designed to meet the needs of the current user population, the level of required services is expected to remain relatively static, however the improved facilities may result in a very modest increase in visitation. Nonetheless, as noted in VII Hazards (g) above, use of construction equipment around flammable annual grasses, though unlikely, may present an increased fire risk that could result in additional demands on local and CDF fire response teams. Any impact on services should be temporary and nothing in the project scope should contribute to the need for an increase in the level of public services. The Fire Management element of the Historic Landscape Management Plan, combined with the availability of on-site fire suppression equipment and support from State Park Rangers and trained staff, should reduce the potential impact to Fire Protection services to a less than significant level. No other public services should be impacted.

XIV. RECREATION.

**WILL THE PROJECT:**

<table>
<thead>
<tr>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility will occur or be accelerated?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>
DISCUSSION

a) No project component should substantially increase visitation or demands to this or any other park or recreational facility in the area. No impact.

b) The proposed plan does include implementation of an already planned for interpretive recreation facility (visitor center). It is not expected that the park will receive additional types of uses but enhancements of current uses. For example, although private horse-boarding has been eliminated, the general public will enjoy increased availability of the parks equestrian recreational opportunities, so this project should have less than significant impact.

XV. TRANSPORATION/TRAFFIC.

<table>
<thead>
<tr>
<th>WILL THE PROJECT:</th>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION</th>
<th>NO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>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)?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>b) Exceed, individually or cumulatively, the level of service standards established by the county congestion management agency for designated roads or highways?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☒</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☒</td>
</tr>
<tr>
<td>d) Contain a design feature (e.g., sharp curves or a dangerous intersection) or incompatible uses (e.g., farm equipment) that will substantially increase hazards?</td>
<td>☐</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
</tr>
<tr>
<td>e) Result in inadequate emergency access?</td>
<td>☐</td>
<td>☒</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>f) Result in inadequate parking capacity?</td>
<td>☐</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
</tr>
<tr>
<td>g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?</td>
<td>☐</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
</tr>
</tbody>
</table>

DISCUSSION

a) No increase in visitation to Will Rogers SHP is anticipated as a result of the proposed project. All construction activities associated with the project will occur within the boundaries of the park and work will not restrict access to or block any public road. Although Interstate 405 and Pacific Coast Highway are the highway accesses for construction equipment, and the remainder accesses (Temescal Canyon Road, Sunset Boulevard and Will Rogers Park Road) are two- and four-lane collectors, the addition of several vehicles entering and leaving during daylight hours should not constitute a substantial increase in traffic volume or result in congestion at the park entrances, or restrict the public’s access to their property. Additionally, most heavy equipment will be stored on
park property for the duration of the project, further reducing the traffic impacts. Therefore, the project should result in a less than significant impact.

b) Per XV(a) Discussion above, the impact on congestion resulting from the additional construction vehicles to normal traffic on Interstate 405, Pacific Coast Highway or surface roads should be minimal and have no impact on the acceptable Level Of Service for this area.

c) Will Rogers SHP is not located within a private airport land-use plan or within two miles of a public airport or public-use airport. Nothing in the proposed project should in any way affect or change existing air traffic patterns in the area. Therefore, no impact should occur as a result of this project.

d) As noted in XV(a) Discussion above, all construction activities associated with the project will occur within the boundaries of the park, and work will not restrict access to or block any public road. The existing General Plan and the proposed Historic Landscape Maintenance Plan recommend that for historic ambiance, ingress to the park should be by the original ranch road. This could potentially create a traffic hazard, as the entrance to that road is on a hairpin curve, and would require the implementation of safety measures, yet to be determined, to reduce the impact to a less than significant level.

e) All construction activities associated with the project will occur within the boundaries of Will Rogers SHP and work will not restrict access to or block any public road. All areas within the park will remain open to the public during construction, although minor individual site closures may occur during construction (minimum access requirements for emergency vehicles will be maintained at all times). Therefore, the impact of this project on emergency access or response should be less than significant.

f) Project construction will generate a temporary demand for construction worker vehicle parking. This parking demand should not be substantial and will likely be accommodated in the construction staging area and at park administration or maintenance facilities. No impact.

g) There are no policies, plans, or programs supporting alternative transportation that apply to the project or project area. The project will have no impact.

XVI. UTILITIES AND SERVICE SYSTEMS.

<table>
<thead>
<tr>
<th>WILL THE PROJECT:</th>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Exceed wastewater treatment restrictions or standards of the applicable Regional Water Quality Control Board?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>Will the construction of these facilities cause significant environmental effects?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>
WILL THE PROJECT:

i) Will the construction of these facilities cause significant environmental effects?  
   □  □  □  □  ※

d) Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed?  
   □  □  ※  □  □

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?  
   □  □  □  ※

f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?  
   □  □  □  ※

g) Comply with federal, state, and local statutes and regulations as they relate to solid waste?  
   □  □  □  ※

DISCUSSION

a) Will Rogers SHP is within the jurisdiction of the xxx[???] Regional Water Quality Control District. The project will be in compliance with all applicable water quality standards and waste discharge requirements. (See Mitigation Measure HAZMAT-1 regarding potential impacts from accidents, spills, or upset.) No impact.

b) The proposed project contains no elements that would have an impact on public water or wastewater treatment facilities. No impact.

c) Some alteration of existing drainage patterns may be a part of this project in order to restore natural drainage patterns and decrease stormwater erosion. However, alteration to overall drainage patterns should be minimal. Therefore, the proposed project should have no impact on existing stormwater drainage facilities or require the construction of new facilities.

d) Current supplies are adequate for existing demands, minimal additional demands associated with the proposed construction, and projected future use to accommodate ornamental landscaping. Therefore, this project should have a less than significant impact on water supplies.

e) Existing facilities have the capacity to handle current and future demands. No impact.

f) The proposed work should not increase the park’s solid waste disposal needs over historic uses; therefore, this project should have no impact.

g) This project will comply with federal, state and local statues and regulations as they relate to solid waste. No impact would result from this project.
### XVII. MANDATORY FINDINGS OF SIGNIFICANCE.

<table>
<thead>
<tr>
<th></th>
<th>POTENTIALLY SIGNIFICANT IMPACT</th>
<th>LESS THAN SIGNIFICANT WITH MITIGATION</th>
<th>LESS THAN SIGNIFICANT IMPACT</th>
<th>NO IMPACT</th>
</tr>
</thead>
</table>

**WILL 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?

b) Have the potential to eliminate important examples of the major periods of California history or prehistory?

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?)

d) Have environmental effects that will cause substantial adverse effects on humans, either directly or indirectly?

**DISCUSSION**

a) The proposed project was evaluated for potential significant adverse impacts to the natural environment. Full implementation of Best Management Practices incorporated into this project should avoid or reduce these potential impacts to a less than significant level.

b) The proposed project may have the potential to adversely effect important examples of major periods of California history or prehistory by disturbing potential historical landscape features, elements, and structures. However, full implementation of all Best Management Practices such as the Secretary of the Interior’s Standards for the Treatment of Historic Properties, and the Departments’ own cultural resource mangement directives, will reduce and potential impacts to a less than significant level.

c) DPR often has other smaller maintenance programs and rehabilitation projects planned for a park unit. And there may be numerous small maintenance and rehabilitation projects on-going at any time. Currently recent, ongoing, or other proposed projects include the restoration of the historic Ranch House, the removal of non-historic facilities within the historic core, and the rehabilitation of Rustic Canyon Trail. However, no other additional projects, other than routine maintenance, are planned for the proposed project area in the foreseeable future that are not included in this plan. Moreover, impacts from other environmental issues addressed in this evaluation do not overlap in
such a way as to result in cumulative impacts that are greater than the sum of the parts. Less than significant impact.

d) Most project-related environmental effects have been determined to pose a less than significant impact on humans. However, possible impacts from construction accidents and fire (Hazards and Hazardous Waste), as well as noise, though temporary in nature, have the potential to result in significant adverse effects on humans. These potentially significant adverse impacts should be reduced to a less than significant level when Best Management Practices are used.
John G. Niles  
1257 Villa Woods Drive 
Pacific Palisades, CA 90272  

October 29, 2002  

Ms. Patricia K. Autrey  
California Department of Parks and Recreation  
Southern Service Center  
8885 Rio San Diego Drive, Suite 270  
San Diego, CA 92108  

Dear Ms. Autrey:  

I am writing in response to the Department’s recent Notice of Preparation of a Historic Landscape Maintenance Plan for Will Rogers State Historic Park. I am currently a member of the Equestrian Advisory Committee appointed by the Department to advise the Director about equestrian activities in the Park (the Notice was apparently addressed to me in that capacity). I have in the past also served as a representative of the interests of the neighbors who live closest to the Park, on Villa Woods, Villa View and Villa Grove Drives in Pacific Palisades.  

If I understand the Notice correctly, it is simply telling us that the Management Plan and an Environmental Impact Statement are in the process of being prepared and will be made available for public comment when they are finished. I would very much like to receive copies of those documents when ready. Please add me to your mailing list.  

It is difficult to comment on your Environmental (Initial Study) Checklist without knowing more about what the Management Plan actually provides. As the Park’s immediate neighbors, we are of course very concerned with traffic, noise and odor problems, as well as with the specific locations chosen for Park facilities such as parking, the Visitor Center and maintenance facilities. We were, for example, adamantly opposed to the initial proposal, when the 1992 General Plan was being prepared, to locate a parking lot next to the homes in our neighborhood. A later proposal, to use the same space as an Operations and Maintenance Area, was also unacceptable. I am pleased to see that the plan now seems to be to put the O&M area into the canyon immediately below the main parking lot and Visitor Center — a much better solution.  

These, then are the kinds of concerns we have as neighbors of the Park, and we hope you will take them into account as you finalize the Management Plan and Environmental Impact Statement. I look forward to receiving copies of both. Thanks for your consideration.  

Sincerely,  

[Signature]  

John G. Niles
November 8, 2002

Patricia K. Autrey
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

RE: Scoping comments on Will Rogers’ State Historic Park Historic Landscape Maintenance Plan and Restoration.

Dear Ms. Autrey,

The California Native Plant Society (CNPS) is a non-profit organization of more than 10,000 laypersons and professional botanists organized into 32 chapters throughout California. The mission of the California Native Plant Society is to increase understanding and appreciation of California’s native plants and to conserve them and their natural habitats, through education, science, advocacy, horticulture and land stewardship.

With regards to the planned action of the “Replanting of historic ornamental vegetation in Management Areas 1, 2, and 3”, the CNPS urges State Parks not to incorporate any invasive exotic vegetation, despite the fact that invasive exotics may have been part of the original historic ornamental vegetation. State Parks, as well as many other land management entities and environmental groups, have been actively involved and cooperated to remove invasive exotic plants which threaten California natural vegetation heritage. Literally millions of dollars have been spent on exotic-eradication efforts through out the years. While many successes have occurred, many areas of invasive exotics remain, with new species invading annually. State Parks has an obligation to continue to be part of the solution – not part of the problem – in maintaining our native vegetation heritage. Because of the proximity of Will Rogers State Historic Park to open space in the Santa Monica Mountains, it is especially important to carefully and thoroughly review and incorporate only native or non-invasive exotic vegetation as part of the historic replanting of ornamental vegetation in Management Plan Areas 1, 2 and 3. Additionally, thought should be given to other restoration activities and their potential to introduce additional exotic species on site – for example, if hay is used for aesthetic purposes, the bales should be certified weed-free.

For more information on invasive exotics of concern, we direct you to the State of California Website of noxious weeds at http://pi.cdfa.ca.gov/weedinfo/sortbyrating2.htm and strongly discourage the use of any of the A,B, C or Q rated plants as presented on the State’s list. Additionally we recommend the California Exotic Plant Pest Council’s list of exotic pest plants at http://www.caleppc.org/info/plantlist.html. Again, we strongly discourage incorporating any of the species on these lists as well.

Thank you in advance for incorporating our concerns into your planning documents, and we look forward to continued participation in the process. If you have any further questions on the exotics issues, please feel free to contact me at (323) 654-5943.

Sincerely,

Ileené Anderson
Southern California Regional Botanist
California Native Plant Society

Dedicated to the preservation of California native flora
November 5, 2002

Patricia K. Autrey
Department of Parks and Recreation
8885 Rio San Diego, Suite 270
San Diego, CA 92108

RE: SCH# 2002101070 – Historic Landscape Maintenance Plan and Restoration, Will Rogers SHP, Los Angeles County

Dear Ms. Autrey:

The Native American Heritage Commission has reviewed the Notice of Preparation (NOP) regarding the above project. To adequately assess and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

✔ Contact the appropriate Information Center for a record search to determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on 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 measurers 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.

✔ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check. **Check Completed with negative results, 11/4/02**
  - A list of appropriate Native American Contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached**

✔ 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.
  - 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 in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5 (e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Rob Wood
Environmental Specialist III
(916) 653-4040

CC: State Clearinghouse
NATIVE AMERICAN CONTACTS
Los Angeles County
November 5, 2002

Samuel H. Dunlap
P.O. Box 1391
Temecula, CA 92593
(909) 699-5544 (Voice)
(909) 262-9351 (Cell)
(909) 693-9196 FAX

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Chairperson
PO Box 490
Bellflower, CA 90707
(562) 761-6417 - Voice
562 920-9449 - Fax

LA City/County Native American Indian Comm
3175 West 6th Street, Rm. 403
Los Angeles, CA 90020
(213) 351-5308
(213) 386-3995 FAX

John Valenzuela
PO Box 402597
Hesperia, CA 92340
(760) 949-2103 Home
Chumash Tataviam Tongva, Gabrielo Vanyume; Serrano Kitanemuk

Ti'At Society
Cindi Alvitre
15600 Mulholland Dr., Apt. K
Bel Air, CA 90077
(310) 440-0245

Gabrieleno/Tongva Tribal Council
Anthony Morales, Chairperson
PO Box 693
San Gabriel, CA 91778
(626) 286-1632
(626) 286-1262 Fax
(626) 286-1758 (Home)

Island Gabrieleno Group
John Jeffredo
PO Box 669
San Marcos, CA 92079-0669
(760) 723-9279

Craig Torres
713 E. Bishop
Santa Ana, CA 92701
(714) 542-6678

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 5097.84 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 regards to the cultural assessment for the proposed SCH# 2002101170 - Historic Landscape Maintenance Plan and Restoration, Will Rogers SHP, Los Angeles County.
Alfred L. Valenzuela  
18678 Pad Court  
Newhall, CA 91321  
(661) 252-1486 Home  
(661) 755-8314 Work  
Chumash  
Tataviam  
Gabrielino  
Kitanemuk  
Vanyume; Serrano

Jim Velasques  
5776 42nd Street  
Riverside, CA 92509  
(909) 784-6660  
Gabrielino  
Kumeyaay

Gabrielino/Tongva Tribal Council of the Gabrielino Tongva Nation  
501 Santa Monica Blvd., Suite 500  
Santa Monica, CA 90401-2415  
(310) 587-2203  
(310) 587-2281 Fax  
Gabrieleno Tongva

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 5997.94 of the Public Resources Code and Section 5997.99 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regards to the cultural assessment for the proposed SCH# 2002101070 - Historic Landscape Maintenance Plan and Restoration, Will Rogers SHP, Los Angeles County.
November 1, 2002

Ms. Patricia K. Autrey  
Department of Parks and Recreation  
8885 Rio San Diego, Suite 270  
Sacramento, California 92108

NOTICE OF PREPARATION OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HISTORIC LANDSCAPE MAINTENANCE PLAN AND RESTORATION, SCH NO. 2002101070

Dear Ms. Autrey:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation of a draft Environmental Impact Report (EIR) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows:

1. The draft EIR needs to identify and determine whether current or historic uses at the Project site have resulted in any release of hazardous wastes/substances at the Project area.

2. The draft EIR needs to identify any known or potentially contaminated site within the Project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.

3. The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.

4. If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exists, the draft EIR

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

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should identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818) 551-2870 or me, at (818) 551-2877.

Sincerely,

Harlan R. Jeche
Unit Chief
Southern California Cleanup Operations Branch – Glendale Office

Enclosure

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806
Department of Toxic Substances Control

Edwin F. Lowry, Director
1001 “I” Street, 25th Floor
P.O. Box 806
Sacramento, California 95812-0806

Gray Davis
Governor

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

MEMORANDUM

SOUTHERN CALIFORNIA SITE MITIGATION BRANCH

OCT 24 2002

RECEIVED

TO: Sayareh Amirebrahimi, Branch Chief
Site Mitigation Program, Region 3

FROM: Guenther W. Moskat, Chief
Planning and Environmental Analysis Section

DATE: October 21, 2002

SUBJECT: TRANSMITTAL AND REVIEW OF LEAD AGENCY ENVIRONMENTAL DOCUMENTS FOR
Historic Landscape Maintenance Plan and Restoration - 2002061070

The Department has received the project listed above. The project is being referred to you as a:

☐ Non-Essential/Information Item Only
☐ Sensitive Land Use Project
☐ Non-Sensitive land Use Project

A Courtesy Copy of the Notice of Completion Transmittal Form has also been sent to:

☐ Permitting Branch (document not included)

The Department is encouraged to review this project and if applicable make comments pertaining to the project as it relates to hazardous waste and/or any activities which may fall within the Department’s jurisdiction. Please have your staff: 1) conduct its review of the attached document prior to the end of the comment period; 2) complete the applicable items below stating whether the department made comments or that no comments were necessary for the document; and 3) return this original transmittal sheet and a copy of any response letter from your office to:

Planning & Environmental Analysis Section (PEAS)
CEQA Tracking Center
1001 I Street, 22nd Floor
P.O. Box 806
Sacramento, California 95812-0806
Fax (916) 323-3215

Reviewed by: ALBERTO VALMIDIANO Date: 11/01/02

Date Comment Period Began: 10/15/2002
Comments due to OPR: 11/13/2002

COMMENTS have been prepared and a copy has been provided to PEAS via:

☒ Attached Copy
☐ FAX (916) 323-3215

NO COMMENTS NECESSARY because:

☒ All Department concerns have been adequately addressed; OR
☒ Project does not fall within the Department’s areas of responsibility

Thank you for your assistance with this project. If you have any questions, please contact Ken Tipton, CEQA Tracking Center, at (916) 322-5265.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

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APPENDIX B

NATIVE PLANTS TABLE
For Figure 8.1 go to: native plant survey.pdf
Native Plants Table go to: Native Plant Table.pdf
APPENDIX C

AREA PLANTS SURVEY TABLE
For Area Plants Survey Table go to:
Area Plant Survey Table1.pdf
And
Area Plant Survey Table2.pdf
# Mitigation Monitoring & Reporting Program- Will Rogers SHP Historic Landscape Management Plan

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Timing of Action</th>
<th>Reporting Methods &amp; Standards</th>
<th>Monitoring Reporting Party</th>
<th>Check Off &amp; Date</th>
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<tbody>
<tr>
<td><strong>Historic Resources</strong>&lt;br&gt;Mitigation HR-1:&lt;br&gt;- All proposed and future work tasks will be designed and implemented in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and Cultural Landscapes (Weeks and Grimmer 1995; Birnbaum and Peters 1996). In order to implement the Secretary's Standards for all actions proposed in this plan, a mitigation program has been outlined to assure that all potential impacts from project improvements and programs will be addressed and treated.&lt;br&gt;- Appropriate historic-style fencing materials will be placed around the construction sites when feasible, to minimize visual impacts during implementation work.&lt;br&gt;- A recordation and monitoring program will be developed for implementation of treatments and a preservation maintenance guide for directing on-going work and programs.&lt;br&gt;- All uses within the Historic Landscape district, including special events, will be carefully considered as directed by this Plan and the General Plan, and only those that will maintain the park's &quot;spirit of place&quot; will be approved.</td>
<td>Prior to design and implementation&lt;br&gt;During construction&lt;br&gt;Prior to implementation&lt;br&gt;Pre-during- and post HLMP</td>
<td>Compliance with Secretary of Interior Standards for the Treatment of Historic Properties and Cultural Landscapes (Weeks and Grimmer 1995; Birnbaum and Peters 1996)&lt;br&gt;Use of wood or natural materials - when feasible for public safety&lt;br&gt;Use of Best Management Practices&lt;br&gt;Use of General Plan/HLMP and terms of grant deed to see if use is appropriate</td>
<td>Project Manager/State Historian&lt;br&gt;Project Manager&lt;br&gt;Project Manager, State Historian&lt;br&gt;Sector Superintendent/State Historian</td>
<td></td>
</tr>
<tr>
<td><strong>Geology</strong>&lt;br&gt;Mitigation Geo-1:&lt;br&gt;- The park's Emergency Preparedness Plan will reflect the use patterns recommended in the HLMP, on-site state park rangers will evacuate the public if necessary.&lt;br&gt;- Within the concept of using the least invasive design while meeting the department's <em>Mission</em>, structures will comply with applicable codes, and fixtures will be affixed to walls for safety.</td>
<td>Prior to public Use&lt;br&gt;Prior to construction, and public use.</td>
<td>Train staff in emergency procedures&lt;br&gt;Applicable Safety codes, Sec. of Interior's Standards, and Emergency Plan</td>
<td>Sector Superintendent/Park Rangers&lt;br&gt;Project Manager</td>
<td></td>
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</table>

MM-I
### Hazardous Materials Mitigation Hazmat-1:
- All hazardous substances must be contained, cleaned or removed and disposed according to accepted Federal, State, and Local protocols specific to each type of substance. This will reduce the potential impact to a level below significance. Accepted Federal, State, and Local protocols will be followed for the containment, cleaning, removal and disposal of all hazardous substances. A site-specific hazardous material report will be generated prior to or during the working drawing phase.

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Timing of Action</th>
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<th>Check Off &amp; Date</th>
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<tbody>
<tr>
<td>Prior to or during the working drawing phase</td>
<td>Accepted Federal, State, and Local protocols will be followed for the containment, cleaning, removal and disposal of all hazardous substances.</td>
<td>Project Manager</td>
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### Hazardous Materials Mitigation Hazmat-2:
- All equipment will be inspected for leaks immediately prior to the start of construction, and regularly inspected thereafter until equipment is removed from park premises.
- Contractor(s) will prepare an emergency spill response plan prior to the start of construction and maintain a spill kit on site throughout the life of the project. This plan will include a map that delineates construction staging areas, where refueling, lubrication, and maintenance of equipment may occur. In the event of any spill or release of any chemical during construction, in any physical form on or immediately adjacent to park property, the contractor will immediately notify the appropriate DPR staff (e.g., project manager or supervisor). Emergency containment procedures will be immediately initiated to prevent contamination of the environment.
- Equipment will be cleaned and repaired (other than emergency repairs) outside the park boundaries. All contaminated water, sludge, spill residue, or other hazardous compounds will be disposed of outside park boundaries, at a lawfully permitted or authorized location.

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<tr>
<th>Mitigation Measure</th>
<th>Timing of Action</th>
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<tbody>
<tr>
<td>Prior &amp; during construction.</td>
<td>BMP’s, spot inspections by Project Manager</td>
<td>Project Manager, Contractor</td>
<td>Project Manager, Contractor</td>
<td></td>
</tr>
<tr>
<td>Prior &amp; during construction.</td>
<td>Plan to delineate construction staging areas, where refueling, lubrication, and maintenance of equipment occurs - mitigation will be included in construction Documents</td>
<td>Project Manager, Contractor</td>
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<td></td>
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<tr>
<td>During construction</td>
<td>Best Management Practices, spot inspections by Project Manager</td>
<td>Project Manager, Contractor</td>
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MM-II
<table>
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<th>Mitigation Measure</th>
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<td>Noise Mitigation Noise-1:</td>
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<tr>
<td>• Construction activities will be generally limited to daylight hours; alterations in this schedule will be made to address overriding construction considerations or worker safety. No work shall take place on weekends or holidays.</td>
<td>Prior to &amp; during construction</td>
<td>Project timetable will be developed to meet this standard</td>
<td>Project Manager</td>
<td></td>
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<tr>
<td>• Internal combustion engines used for any purpose at the job site shall be equipped with a muffler of a type recommended by the manufacturer. Equipment and trucks used for construction will utilize the best available noise control techniques (e.g., ducts, etc.) whenever feasible and necessary.</td>
<td>During construction</td>
<td>Construction trucks &amp; equipment to utilize the best available noise control techniques</td>
<td>Project Manager, Contractor</td>
<td></td>
</tr>
<tr>
<td>• Stationary noise sources and staging areas will be located as far from sensitive receptors as possible. If they must be located near sensitive receptors, stationary noise sources will be muffled to the extent feasible and/or, where practicable, enclosed within temporary sheds.</td>
<td>Prior to &amp; during construction</td>
<td>Coordination with park technical staff</td>
<td>Sector Superintendent, Project Manager</td>
<td></td>
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<tr>
<td>Water Quality Mitigation WQ-1:</td>
<td></td>
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<td></td>
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<tr>
<td>• The proposed development of a new visitor center, relocation of maintenance facilities and paved parking areas will require incorporation of stormwater treatment BMPs to meet City of Los Angeles requirements for water quality. Unpaved parking areas will not need treatment.</td>
<td>Prior to construction</td>
<td>Compliance with LA City Codes</td>
<td>Project Manager</td>
<td></td>
</tr>
<tr>
<td>• All soil disturbing activities, including grading and excavating, associated with road construction and other construction activities, will be subject to restrictions and requirements set for in permits. To ensure that the project would not result in adverse effects to water quality due to storm runoff, activities are subject to the requirements of the Clean Water Act and National Pollution Discharge Elimination System (NPDES). State Parks will use Best Management Practices throughout construction to avoid and minimize indirect impacts associated with the proposed project.</td>
<td>Prior to &amp; during construction</td>
<td>Applicable permits will be obtained and BMP’s will be practiced</td>
<td>Project Manager</td>
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MM-III
<table>
<thead>
<tr>
<th>Mitigation Measure</th>
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<tr>
<td>Runoff from paved surfaces will be captured, detained</td>
<td>Prior/ post construction</td>
<td>These measures will be incorporated into design</td>
<td>Project Manager</td>
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<tr>
<td>and treated at the stormwater management pond on Sarah's</td>
<td>Prior/ post construction</td>
<td>These measures will be incorporated into design</td>
<td>Project Manager</td>
<td></td>
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<tr>
<td>Point. (An alternative measure, which may be considered,</td>
<td>During Design</td>
<td>Best Management Practices included in plans/coordination with LA traffic engineers</td>
<td>Project Manager/ Historian</td>
<td></td>
</tr>
<tr>
<td>is the use of hydrodynamic separator units.) A biofiltration swale downstream of the units will provide filtration of smaller sediments and petroleum hydrocarbons.</td>
<td>Post Construction</td>
<td>Mitigation will be incorporated into park operations</td>
<td>Park Superintendent</td>
<td></td>
</tr>
<tr>
<td>Upstream runoff will be prevented from entering new paved areas to ensure that the treatment drains are not overloaded.</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

**Water Quality Mitigation WQ-2:**

(See Mitigation Hazmat-2)

**Traffic/Circulation Mitigation T/C-1:**

- As presented in the Will Rogers State Historic Park Interpretive Strategy Report, the historic entrance may be returned to use as the primary entrance to the Park. For efficient operation, the entrance will be one-way and the intersection with Sunset Boulevard will need to be signalized. Included in the plans for signalization would be the General Plan recommendation for ‘Park Full’ signs readable to traffic on Sunset Boulevard in advance of the entrance intersection. Preliminary discussions with the City of Los Angeles traffic-engineering department indicate that a traffic study to establish a warrant for the signal would be the only requirement. Any widening of the historic entrance road to provide adequate access for larger vehicles, will be in compliance with the Secretary of the Interiors Standards.
- Exit from the Park will be provided by the existing Will Rogers State Park Road. This Road will be maintained for two-way traffic, providing an alternative entrance for special events and emergency vehicles.
<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Timing of Action</th>
<th>Reporting Methods &amp; Standards</th>
<th>Monitoring Reporting Party</th>
<th>Check Off &amp; Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Traffic control will be provided by Park operations or event sponsors as needed.</td>
<td>Ongoing</td>
<td>Mitigation will be incorporated into park operations</td>
<td>Sector Superintendent</td>
<td></td>
</tr>
</tbody>
</table>
| **Air Quality**  
**Mitigation AQ-1:** | | | |
| • The area disturbed by earthmoving equipment or excavation operations shall be minimized at all times. Demolition and earth moving activities shall be limited or redirected during periods of high winds. On-site vehicle speed shall be reduced to 15 mph. Storage piles of material and graded areas shall be either watered twice daily or covered to prevent fugitive dust emissions. Historical ornamental vegetation located within the likely dust drift radius of construction areas shall be periodically sprayed with water to reduce accumulated dust on the leaves as recommended by monitoring biologists in accordance with *HLMP* construction guidelines. All mechanical equipment shall be operated in compliance with appropriate air quality controls. | During construction. | Mitigation will be included in construction Documents, BMP’s. | Project Manager | |