

# **IV. Environmental Impact Analysis**

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## **C. Cultural Resources**

### **1. Introduction**

This section of the Draft EIR provides an analysis of the Project's potential impacts on cultural resources, including historical resources, archaeological resources, and human remains. The information and analysis in this section is based primarily on the following items (refer to Appendix D):

- Cultural and Paleontological Resources Assessment Report for the Prologis Vermont Avenue and Redondo Beach Industrial Project, Cogstone Resource Management Inc., February 2020.

### **2. Environmental Setting**

#### **a. Regulatory Framework**

Cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, State, and local laws governing and influencing the preservation of cultural resources of national, State, regional, and local significance include:

- National Historic Preservation Act of 1966, as amended;
- Archaeological Data Preservation Act;
- California Environmental Quality Act (CEQA);
- California Register of Historical Resources (California Register);
- The California Public Resources Code;
- City of Los Angeles General Plan;
- City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171);
- City of Los Angeles Historic Resources Survey (SurveyLA)

## (1) Federal

### (a) *National Historic Preservation Act and National Register of Historic Places*

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historic resources and to indicate what properties should be considered for protection from destruction or impairment”.<sup>1</sup> The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.<sup>2</sup>

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.<sup>3</sup> A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district’s significance and historic integrity determine its boundaries. Other factors include:

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

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<sup>1</sup> 36 Code of Federal Regulations (CFR) 60.

<sup>2</sup> United States Department of the Interior, National Park Service, *National Historic Landmarks Frequently Asked Questions*. Accessed May 15, 2021 at <https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm>.

<sup>3</sup> United States Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, page 5.

- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.<sup>4</sup>

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

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

A resource that is listed in or eligible for listing in the National Register is considered “historic property” under Section 106 of the National Historic Preservation Act.

(i) *Criteria*

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 CFR, Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Are associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.<sup>5</sup>

(ii) *Context*

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns,

<sup>4</sup> *United States Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties Form, 1997, page 12.*

<sup>5</sup> *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 8.*

themes, or trends in history by which a specific...property or site is understood and its meaning... is made clear.”<sup>6</sup> A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

(iii) *Integrity*

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as “the ability of a property to convey its significance”.<sup>7</sup> The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.

In the case of districts, integrity means the physical integrity of the buildings, structures, or features that make up the district as well as the historic, spatial, and visual relationships of the components. Some buildings or features may be more altered over time than others. In order to possess integrity, a district must, on balance, still communicate its historic identity in the form of its character defining features.

(iv) *Criteria Considerations*

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.<sup>8</sup> Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of their historical importance.<sup>9</sup> The full list of Criteria Considerations is provided below:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or

<sup>6</sup> *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, pages 7 and 8.*

<sup>7</sup> *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 44.*

<sup>8</sup> *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 25.*

<sup>9</sup> *United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 41.*

- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or
- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- G. A property achieving significance within the past 50 years, if it is of exceptional importance.

*(b) Archaeological Data Preservation Act*

The Archaeological Data Preservation Act (ADPA) requires agencies to report any perceived project impacts on archaeological, historical, and scientific data and requires them to recover such data or assist the Secretary of the Interior in recovering the data.

(2) State

*(a) California Environmental Quality Act*

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the state and is codified in Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under PRC Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5 recognizes that historical resources include (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register); (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g);

and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.<sup>10</sup> If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.<sup>11</sup>

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired”.<sup>12</sup> According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

<sup>10</sup> *California Public Resources Code Section 21083.1(a)*,

<sup>11</sup> *State CEQA Guidelines Section 15064.5(c)(4)*.

<sup>12</sup> *State CEQA Guidelines Section 15064.5(b)(1)*.

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant.<sup>13</sup>

*(b) California Register of Historical Resources*

The California Register is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”<sup>14</sup> The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.<sup>15</sup> Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

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

<sup>13</sup> *State CEQA Guidelines Section 15064.5(b)(3).*

<sup>14</sup> *California Public Resources Code Section 5024.1[a].*

<sup>15</sup> *California Public Resources Code Section 5024.1[b].*

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

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

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

*(c) California Public Resources Code (PRC)*

California PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any



associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

### (3) Local

#### (a) *City of Los Angeles General Plan*

##### (i) *Conservation Element*

The City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.<sup>16</sup>

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level:

1. Historic-Cultural Monument (HCM)
2. Classification by the City Council as a Historic Preservation Overlay Zone (HPOZ)

#### (b) *City of Los Angeles Cultural Heritage Ordinance*

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Cultural Heritage Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating an HCM. The CHC is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The City of Los Angeles Cultural Heritage Ordinance states that a HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature and meet one of the following criteria. A historical or cultural monument is any site, building, or structure of particular historical or cultural significance to the City of Los Angeles. The four criteria for HCM designation are stated below:

<sup>16</sup> *City of Los Angeles, Conservation Element of the General Plan, pages II-3 to II-5.*

- The proposed HCM reflects the broad cultural, economic, or social history of the nation, state or community is reflected or exemplified; or
- The proposed HCM is identified with historic personages or with important events in the main currents of national, state or local history; or
- The proposed HCM embodies the characteristics of an architectural type specimen inherently valuable for a study of a period, style or method of construction;
- The proposed HCM is the notable work of a master builder, designer, or architect whose individual genius influenced his or her age.<sup>17</sup>

A proposed resource may be eligible for designation if it meets at least one of the criteria above. When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the CHC and Office of Historic Resources (OHR) staff often ask the following questions:

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?
- Was the site or structure created by a “master” architect, builder, or designer?
- Did the architect, engineer, or owner have historical associations that either influenced architecture in the City or had a role in the development or history of Los Angeles?
- Has the building retained “integrity”? Does it still convey its historic significance through the retention of its original design and materials?
- Is the site or structure associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities?
- Is the site or structure associated with important movements or trends that shaped the social and cultural history of Los Angeles or its communities?

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts, such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, the LAMC Section 91.106.4.5 states that the Los Angeles Department of Building and Safety “shall not issue a permit to demolish, alter or remove a building or structure

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<sup>17</sup> *City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.*

of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the CEQA Initial Study and Check List, as specified in Section 19.05 of the LAMC. If the Initial Study and Check List identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.”<sup>18</sup>

(c) *City of Los Angeles Historic Resources Survey (SurveyLA)*

SurveyLA is a Citywide survey that identifies and documents potentially significant historical resources representing important themes in the City’s history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning’s OHR. The program was managed by OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially significant resources that reflect important themes in the City’s growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys, conducted from 2010-2017, were completed in three phases by Community Plan area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by Community Redevelopment Agencies. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

Los Angeles’ Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historical resources surveys in the City of Los Angeles. The context statement was organized using the Multiple Property Documentation (MPD) format developed by the National Park Service for use in nominating properties to the National Register. This format provided a consistent framework for evaluating historical resources. It was adapted for local use to evaluate the eligibility of properties for city, state, and federal designation programs. The HCS used Eligibility Standards to identify the character defining, associative features and integrity aspects a property must retain to be a significant example of a type within a defined theme. Eligibility Standards also indicated the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These Eligibility Standards are guidelines based on knowledge of

<sup>18</sup> *City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.*

known significant examples of property types; properties do not need to meet all of the Eligibility Standards in order to be eligible. Moreover, there are many variables to consider in assessing integrity depending on why a resource is significant under the National Register, California Register or City of Los Angeles HCM eligibility criteria. SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed. Resources identified through SurveyLA are not designated resources. Designation by the City of Los Angeles and nominations to the California or National Registers are separate processes that include property owner notification and public hearings.

## **b. Existing Conditions**

### **(1) Historic Setting**

The first European to sail along the coast of California was Juan Cabrillo in 1542 followed by Sebastian Vizcaino in 1602. Between 1769 and 1822, California was colonized by the Spanish, and missions, presidios, and pueblos were established throughout the State.

In 1784, Spanish soldier Juan Jose Dominguez received thousands of acres of land where he established Rancho San Pedro, and part of the land received included what would become known as Gardena Valley. Various ranchers and farmers later purchased land in the valley and the settlement of Gardena was formed in 1887. From 1886 to 1887, population and real estate developments significantly increased due to the construction of the first railroad, which ran from Agricultural Park in Los Angeles, now Exposition Park in the southern portion of Downtown Los Angeles to the town site of Rosecrans. This constructed approximately 20 miles of rail between Los Angeles and Redondo Beach, which ultimately resulted in Gardena's downtown area moving from Figueroa Street to Vermont Avenue. Many Japanese immigrants also moved to Gardena to work as farmers, nurserymen, and gardeners. Prominent crops in the valley included strawberries, blackberries, raspberries, tomatoes, alfalfa, and barley, which led to the reputation of the City of Gardena being Southern California's berry capital. However, Gardena's berry industry declined due to World War I, which led to a shift in cultivation of vital crops. After the war, residential developments replaced farmlands. In 1930, the City of Gardena was established along with the incorporation of neighboring settlements.

The Project Site is located in the Harbor Gateway neighborhood at the border of Los Angeles and Gardena. Harbor Gateway was annexed by the City of Los Angeles in 1908 and was known as the "shoestring strip" that connected the City to the San Pedro harbor. The neighborhood generally maintained a low population until World War II. As a result of the war, a number of residential and industrial buildings were constructed within the neighborhood. Due to its proximity to Gardena and Torrance, residents within Harbor Gateway remained in close affiliation with these cities.

### **(2) History of Project Site**

Review of historic references, maps, and aerial photographs in the Cultural and Paleontological Resources Assessment Report (see Appendix D) showed that the earliest topographic map for

the Project Site dated back to 1896 and included a railway and a pond to the east of the Project Site. In 1924, there appears to be building development at the southern end of the Project Site with three ponds to the northeast. The earliest historic aerial photography dated to 1938 showed a residence in the northwest corner, a residence and multiple ancillary buildings in the southwest corner, a running track in the northeastern portion, and two residences south of the track. By 1952, the residences on the western portion of the Project Site were demolished and a large light-industrial building and smaller building were developed in the northwestern portion with a parking lot south of the buildings. By 1963, the track and residences south of the track were demolished and replaced by a large light-industrial building. Additionally, an L-shaped building was added adjacent to the light-industrial building at the northwestern portion of the Project Site. Two additional light-industrial buildings were constructed along the eastern boundary by 1968, and the Project Site remained unaltered from then to about 2010 to 2012, when all buildings were demolished at the site.

Additionally, according to SurveyLA, the Project Site is located in the industrial and residential neighborhood of Harbor Gateway at the border of Los Angeles and Gardena. Originally part of Rancho San Pedro, Harbor Gateway was annexed by the City of Los Angeles in 1908 in order to allow Los Angeles a direct link to its harbor in San Pedro. Due to the close proximity of neighboring cities of Gardena and Torrance, Harbor Gateway residents often held addresses from these cities and maintained a close affiliation with Gardena or Torrance rather than Los Angeles. The area was commonly referred to as the shoestring strip until 1985 when it became Harbor Gateway. This was part of an attempt by the area's then councilwoman to give residents a sense of pride in their community rather than see themselves as an extension of Gardena or Torrance. However, due to Harbor Gateway's geography it continues to function as a continuation of surrounding cities rather than an independent neighborhood.

### (3) Cultural Resources Records Search and Survey

A cultural resources records search was conducted for the Project at the California Historic Resources Information System (CHRIS) located at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton on November 25, 2019. Results of the record search indicated that 29 previous cultural resources studies have been completed within a one-mile of the Project Site. The search also determined that no previously recorded resources are located within the Project Site, but there are six cultural resources located within one-mile of the Project Site, including one prehistoric archaeological site and five historic built resources. The one prehistoric archaeological site, known as site P-19-000088 and recorded in 1939, contained a midden with lithic and shell scatter. The five historical resources within a one-mile of the Project Site consist of one religious building and four one- to three-story commercial buildings. However, the Project Site was not found to be listed in the National Register, California Register, California Historical Resources Inventory, California Historical Landmarks, or California Points of Historical Interest. A search of the Bureau of Land Management, General Land Office Records, indicated

that several land patents<sup>19</sup> were obtained for portions of the Project Site beginning March 3, 1851, through the Spanish Mexican Grant, and beginning January 21, 1927 through Indemnity Selections by the State of California.

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a Project would have a significant impact related to cultural resources if it would:

**Threshold (a):** *Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5; or*

**Threshold (b):** *Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5; or*

**Threshold (c):** *Disturb any human remains, including those interred outside of formal cemeteries (see Public Resources Code, Ch 1.75, §5097.98, and Health and Safety Code §7050.5(b)).*

For this analysis, the Appendix G Thresholds provided above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Threshold Guide* identifies the following factors to evaluate impacts to cultural resources:

#### (1) Historic Resources

- If the project would result in a substantial adverse change in the significance of a historic resources due to:
  - Demolition of a significant resource;
  - Relocation that does not maintain the integrity and significance of a significant resource;
  - Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; and/or,

<sup>19</sup> A land patent is an exclusive land grant made by a sovereign entity with respect to a particular tract of land.

- Construction that reduces the integrity or significance of important resources on the site or in the vicinity

## (2) Archaeological Resources

- If the project would disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:
  - Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
  - Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
  - Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind; and
  - Is at least 100-years-old and possesses substantial stratigraphic integrity; or,
  - Involves important research questions that historical research has shown can be answered only with archaeological methods.

### **b. Methodology**

The Cultural and Paleontological Resources Assessment for the Project was based on an archaeological records search at the SCCIC at California State University, Fullerton; archival research using sources including the National Register, the California Register, California Historical Resources Inventory, California Historical Landmarks, and California Points of Historical Interest; Native American consultation; review of historic references, maps, and aerial photographs; a pedestrian survey. During the pedestrian survey, the surveyor searched for artifacts, soils discolorations that might indicate the presence of cultural midden, soil depressions, and features indicative of the former presence of structures or buildings, or historic-era debris.

The potential for the Project Site to contain buried archaeological resources is assessed based on the findings of the cultural resource records search (i.e., presence and proximity of known resources), land use history research, subsurface geological conditions, and the proposed excavation parameters for the Project.

### **c. Project Design Features**

No specific project design features are proposed with regard to cultural resources.

## d. Analysis of Project Impacts

***Threshold (a): Would the Project cause a substantial adverse change in the significance of a historical resources pursuant to Section 15064.5?***

As discussed in Subsection VI.6, Impacts Found Not to be Significant, and in the Initial Study (Appendix A) of this Draft EIR, the Project Site is currently vacant, and there are no identified historical resources on-site. **Therefore, no impact would occur with respect to Threshold (a), and no further analysis is required.**

***Threshold (b): Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?***

### (1) Impact Analysis

As discussed above, the record search documented no known archaeological sites within the Project Site. Results of the pedestrian survey also indicated no archaeological resources were observed within the Project Site. Additionally, previous disturbance of the Project Site from past construction activities has reduced the potential for archeological resources to exist on-site. Therefore, the Project Site has low sensitivity for prehistoric cultural resources and buried historical archaeological features such as foundations or trash pits. Although the assessment has not indicated sensitivity for cultural resources within the Project Site boundaries, ground-disturbing activities during grading have the potential to reveal buried deposits not observed on the surface during previous surveys. In that case, the City applies standard conditions of approval to projects that disturb soil to ensure that that impacts to unknown archeological resources would be less than significant. **Therefore, the Project would not cause a substantial adverse change in the significance of archeological resource pursuant to Section 15064.5. With adherence to the City's Standard Condition of Approval for the treatment of archeological resources, impacts to archeological resources would be less than significant and no mitigation measures are required.**

### (2) Mitigation Measures

Impacts to archeological resources were determined to be less than significant. Therefore, no mitigation measures would be required.

### (3) Level of Significance After Mitigation

Impacts regarding archeological resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.



**Threshold (c): *Would the Project disturb any human remains including those interred outside of formal cemeteries?***

As discussed in Subsection VI.6, Impacts Found Not to be Significant, and in the Initial Study (Appendix A) of this Draft EIR, the Project would comply with existing law regarding disturbance of human remains. Therefore, potential impacts with respect to Threshold (c) would be less than significant, and no further analysis is required.

## **4. Cumulative Impacts**

### **(1) Impact Analysis**

The area considered for cumulative impacts is the City of Los Angeles and related projects. Archaeological resources impacts are site-specific and generally do not combine to result in cumulative impacts. In the immediate vicinity of the Project Site, no significant archaeological resources were identified that if altered could combine with the effects of the project to result in a cumulatively significant impact to archaeological resources. Additionally, archaeological resources investigations would be required for other projects before the City of Los Angeles would permit ground disturbances or demolition or substantial alteration of existing structures. Such investigations would identify resources on the affected project sites that are or appear to be eligible for listing on the National or California Register. Such investigations would also recommend mitigation measures to protect and preserve cultural resources. The proposed Project includes City's conditions of approval to ensure proper identification, treatment, and preservation of cultural resources on the Project Site. Therefore, cumulative impacts to archaeological resources would be less than significant.

### **(2) Mitigation Measures**

Cumulative impacts to archaeological resources would be less than significant. Therefore, no mitigation measures would be required.

### **(3) Level of Significance After Mitigation**

Cumulative impacts to archaeological resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the cumulative impact level remains less than significant.