

IV. Environmental Impact Analysis

B. Cultural Resources

1. Introduction

This section evaluates potential impacts on cultural resources (including archaeological and historical resources) that could result from implementation of the Project. The analysis provided in this section is based on the 670 Mesquit Project Cultural Resources Assessment Report (Cultural Resources Assessment Report) prepared by ESA.¹ The report is included as Appendix D of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

Numerous laws and regulations require federal, state, and local agencies to consider the effects a project may have on cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies.

(1) Historical Architectural and Archaeological Resources

Historic and archaeological resources are governed by federal, state, and local (i.e., City of Los Angeles) regulations that provide the framework for the identification and protection of these resources. The National Historic Preservation Act (NHPA) and the California Environmental Quality Act (CEQA) are the primary regulations governing historic and archaeological resources in California. Regulations governing historic resources are also applicable to archaeological resources, since the latter are also considered historic resources. Regulations applicable to historic and archaeological resources are discussed below.

(a) *Federal*

(i) *National Historic Preservation Act*

The principal federal law addressing historic properties is the National Historic Preservation Act (NHPA), as amended,² and its implementing regulations.³ The term

¹ ESA, 670 Mesquit Project, *Cultural Resources Assessment Report*, December 2021.

² 54 United States Code of Laws [USC] 300101 et seq.

³ 36 Code of Federal Regulations (CFR) Part 800

“historic properties” refers to “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register”.⁴

(ii) *National Register of Historic Places*

The National Register of Historic Places (National Register) was established by the NHPA of 1966, 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”^{5,6} 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.

(a) Criteria

To be eligible for listing in the National Register, a property must be significant in American history, architecture, archaeology, engineering, or culture. Properties of potential significance must meet one or more of the following four established criteria:

- 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.

(b) 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, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.”⁷ 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.

⁴ 36 CFR Part 800.16(l)(1)

⁵ U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, National Park Service, Washington, D.C., 1997, pp. 7 and 8.

⁶ U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, National Park Service, Washington, D.C., 1997, pp. 7 and 8.

⁷ U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, National Park Service, Washington, D.C., 1997, pp. 7 and 8.

(c) Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity. Integrity is defined as “the ability of a property to convey its significance”.⁸ 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.

(d) 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 Consideration A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.⁹ Criteria Consideration G states that “a property achieving significance within the last 50 years is eligible if it is of exceptional importance”. This is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of its historical importance.¹⁰

(b) State

(i) California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified at 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.

The CEQA Guidelines (Title 14 California Code of Regulations [CCR] Section 15064.5) recognize that historical resources include: (1) a resource 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) a resource 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 object, building, structure, site, area, place, record, or manuscript which a lead agency

⁸ U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, National Park Service, Washington, D.C., 2002, p. 44.

⁹ U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, National Park Service, Washington, D.C., 2002, p. 25.

¹⁰ U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, p. 41.

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. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be a historical resource as defined in PRC Section 5020.1(j) or 5024.1.

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, which is as 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:

1. Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or,
3. 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 (PRC Section 21083.1(a)). 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 (CEQA Guidelines Section 15064.5(c)(4)).

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" (CEQA Guidelines Section 15064.5(b)(1)). 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:

- 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), 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 (Standards) or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Guidelines) shall be considered to have mitigated its impacts to historical resources to a less-than-significant level (CEQA Guidelines Section 15064.5(b)(3)). Both Secretary of the Interior Standards were codified in the Federal Register in 1995. The Standards and Guidelines are a series of concepts about maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations.¹¹ The Standards comprise four different treatment approaches — preservation, rehabilitation, restoration, and reconstruction — each with their own set of standards (ranging from six to ten standards). Depending on the project, either preservation, rehabilitation, restoration, reconstruction, or a combination of the above may be required to mitigate a project under CEQA. The Standards for Rehabilitation are applicable to most rehabilitation and adaptive reuse projects involving continuation of existing use or changes in use. Standards 1 through 7 govern the use, repair and preservation of historic properties. Standard 8 is for significant archaeological resources. Standard 9 governs new additions, exterior alterations, or related new construction, and requires that the new work be differentiated from the old, and that it shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment. Standard 10 governs new additions and adjacent or related new construction and requires that new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

(ii) 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” (PRC Section 5024.1[a]). The criteria for eligibility for the California Register are based upon National Register criteria (PRC Section 5024.1[b]). Certain resources are determined by the statute to be automatically

¹¹ U.S. Department of the Interior National Park Service – Technical Preservation Services, *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, 2017, p. 2.

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 federal, state, and/or local 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.

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 OHP and have been recommended to the State Historical 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;
- Historical resources contributing to historic districts; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

(iii) California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5 requires that in the event human remains are discovered, the County Coroner be contacted to determine the nature of the remains. In the event the remains are determined to be Native American in origin, the Coroner is required to contact the Native American Heritage Commission (NAHC) within 24 hours to relinquish jurisdiction.

(iv) Public Resources Code Section 5097.98

PRC Section 5097.98, as amended by Assembly Bill (AB) 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 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 has inspected the discovery, the MLD 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 landowner 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.

*(c) Local**(i) City of Los Angeles General Plan Conservation Element*

The City of Los Angeles General Plan Conservation Element [Resources], in Section 3, Archaeological and Paleontological Resources, states as its objective: “Protect the City’s archaeological and paleontological resources for historical, cultural, research, and/or educational purposes” by continuing “to identify and protect significant archaeological and paleontological resources known to exist or that are identified during land development, demolition, or property modification activities.” The implementing policy for this objective state that the City will:

... continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.¹²

¹² City of Los Angeles, *Conservation Element of the City of Los Angeles General Plan*, City Plan Case No. 2001-0413-GPA, Council File No. 01-1094, 2001, pp. II-5 and II-6.

The Conservation Element states that the applicant may be required to secure the services of a *bona fide* archaeologist to monitor excavations or other subsurface activities associated with a development project in which all or a portion is deemed to be of archaeological significance. Discovery of archaeological materials may temporarily halt the project until the site has been assessed, potential impacts evaluated and, if deemed appropriate, the resources protected, documented and/or removed.

(ii) *Local Designations*

(a) Los Angeles Cultural Heritage Ordinance

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level, including designation of a Historic-Cultural Monument (HCM) and classification of an Historic Preservation Overlay Zone (HPOZ). Of these, the designation of an HCM is relevant to this Project and is discussed below.

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Los Angeles Administrative Code, Chapter 9, Division 22, Article 1, Section 22.171.7). The Cultural Heritage Ordinance was revised in 2018 (Ordinance No. 185472, amending Section 22.171 of Article 1, Chapter 9, Division 22 of the Los Angeles Administrative Code).¹³ The Cultural Heritage Ordinance establishes criteria for designating a local historical resource as an HCM. According to the Cultural Heritage Ordinance, an HCM is any site (including significant trees or other plant life located on the site), building, or structure of particular historic or cultural significance to the City. HCMs are regulated by the City's Cultural Heritage Commission and the City Council.

The Cultural Heritage Ordinance states that a Historic-Cultural Monument 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 criteria that follows:

1. [It] is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community;
2. [It] is associated with the lives of historic personages important to national, state, city, or local history; or
3. [It] embodies the distinctive characteristics of a style, type, period or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.¹⁴

Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for HCM status. Buildings may be eligible for HCM status if they retain their

¹³ City of Los Angeles, Office of Historic Resources, Cultural Heritage No. 185472, 2018, p. 1.

¹⁴ City of Los Angeles Department of City Planning, Office of Historic Resources, "What Makes a Resource Historically Significant?" 2009, <https://preservation.lacity.org/commission/what-makes-resource-historically-significant>, accessed January 14, 2019.

historic design and materials. Those that are intact examples of past architectural styles or that have historic associations may meet the criteria listed in the Cultural Heritage Ordinance.

The Los Angeles Cultural Heritage Ordinance provides that compliance with the Standards is part of the process for review and approval by the Cultural Heritage Commission of proposed alterations to HCMs (see Los Angeles Administrative Code Section 22.171.14.a.1). Therefore, the Standards are used for regulatory approvals for designated resources but not for resource evaluations.

(b) Los Angeles Municipal Code
Section 91.106.4.5 (Permits for Historical and Cultural Buildings)

In addition, Los Angeles Municipal Code (LAMC) Section 91.106.4, which deals with permits, contains a provision for permits for historical and cultural buildings. This subsection states Los Angeles Department of Building and Safety Department (LADBS) “shall not issue a permit to demolish, alter or remove a building or structure 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 Historic-Cultural monuments, 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.” Furthermore, pursuant to LAMC Section 91.106.4.5.1, LADBS “shall not issue a building permit for demolition of a building or structure for which the original building permit was issued more than 45 years prior to the date of submittal of the application for demolition pre-inspection, or where information submitted with the application indicates that the building or structure is more than 45 years old based on the date the application is submitted,” without having first provided the required notice and taken the required actions at least 30 days prior to issuance of the demolition of building or structure permit. The required notice involves the department sending written notice of the demolition pre-inspection application via U.S. mail to the abutting property owners and occupants, as well as the Council District Office and Certified Neighborhood Council Office representing the site, for which a demolition pre-inspection has been proposed for a building or structure.

Additionally, any interested individual may apply for a proposed designation of a Historic Cultural Monument. Upon the determination by the Planning Director that the application is complete—or upon initiation by City Council, Cultural Heritage Commission, or Planning Director—no permit for the demolition substantial alteration, or removal shall be issued. The site, building, or structure, regardless of whether a permit exists, shall not be demolished, pending final determination by the Commission and City Council whether the proposed site, building, or object or structure shall be designated a Historic-Cultural Monument, pursuant to Cultural Heritage Ordinance No. 185472, amending Section 22.171 of the Los Angeles Administrative Code. Also, if the property has been previously identified in a survey or has been nominated for designation and it is

determined by the City that a project is subject to CEQA review, the City may require preparation of a historical resources assessment report and CEQA impacts analysis, pursuant to CEQA Guidelines Section 15064.5, prior to issuance of a demolition permit. Once the process pursuant to LAMC Section 91.106.4.5.1 is completed, the LADBS will then be able to issue the applicable permits.

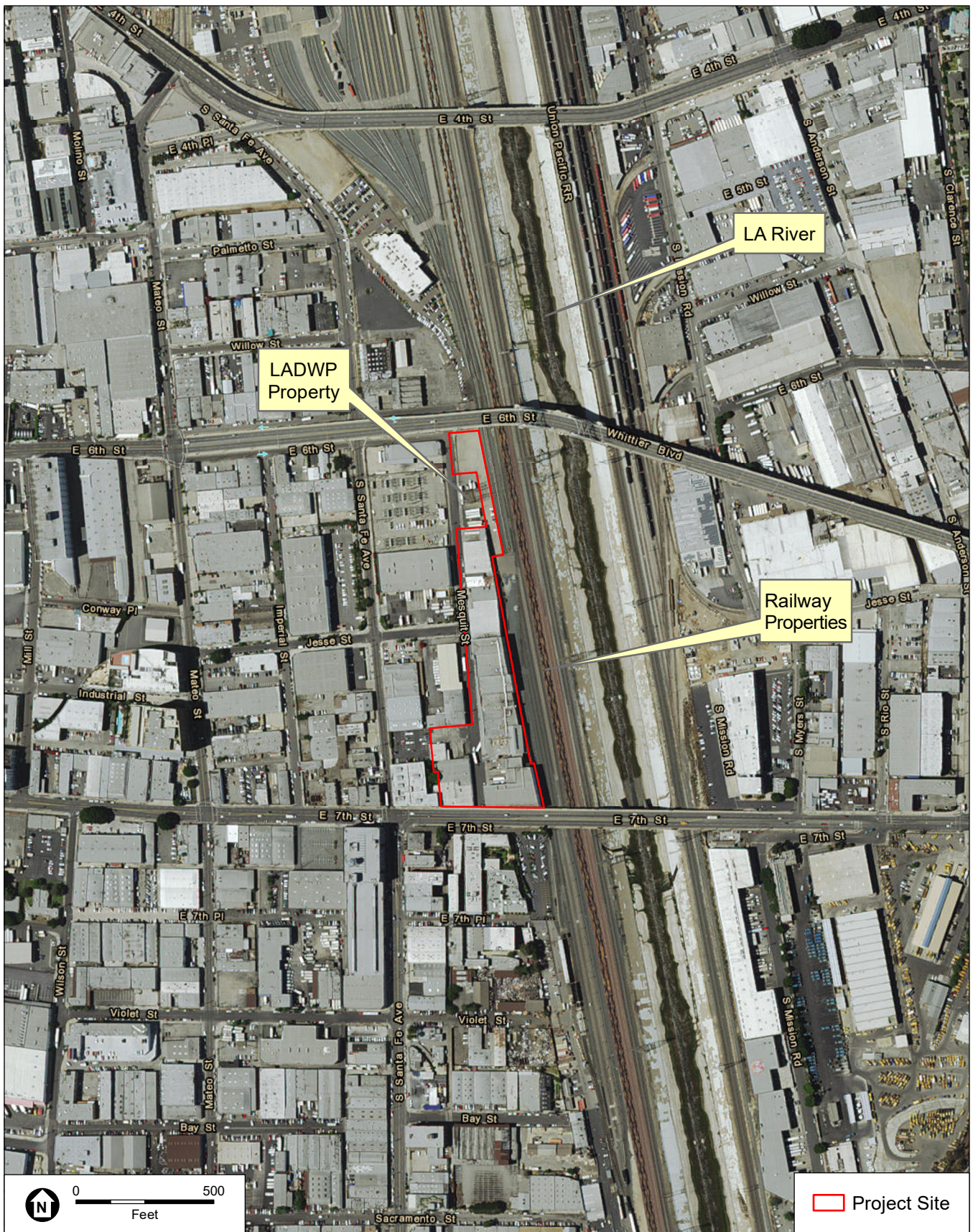
b) Existing Conditions

The Project Site is located at 670 Mesquit Street in the Arts District of the City of Los Angeles and occupies an approximately 4.62-acre area, encompassing assessor parcel numbers (APNs) 5164-016-803; 5164-017-002; 5164-017-003; 5164-017-006; 5164-017-008; and 5164-018-009. The Project Site is primarily bounded on the north by former 6th Street Viaduct right-of-way, on the south by 7th Street Bridge, on the east by the railroad right-of way, and on the west by a Los Angeles Department of Water and Power (LADWP) facility, Mesquit Street, and the warehouse facility on the west side of Mesquit Street north of the 7th Street Bridge. The majority of the Project Site is on the east side of Mesquit Street; the southern portion of the Project Site also includes parcels on the west side of Mesquit Street at 7th Street.

The Project Site is currently developed with existing one- to four-story freezer, cold storage, and dry storage warehouses with associated office space, loading docks, and surface parking. The existing warehouses date from approximately 1908 through 2002. The primary business, Rancho Cold Storage, has operated on-site for more than 30 years. Other on-site businesses include Hidden Villa Ranch, Integrated Food Service, and Harvey's Produce. **Figure IV.B-1, Aerial Photograph with Surrounding Uses**, provides an aerial view of the Project Site and its surroundings. The following is a summary of data more fully presented in the Cultural Resources Assessment Report provided in Appendix D of this Draft EIR.

(1) Natural Setting

The Project Site is located in a relatively flat area of the western Los Angeles Basin. The Los Angeles Basin is bounded by the Santa Monica Mountains to the northwest, the San Gabriel Mountains to the north, and the San Bernardino and San Jacinto Mountains to the east. The Los Angeles Basin was formed by alluvial and fluvial deposits derived from these surrounding mountains and the Los Angeles River. Prior to urban development and channelization of the Los Angeles River, the Project Site, which is located 200 feet west of the Los Angeles River Channel, was likely covered with marshes, thickets, dense woodland, and grassland. The floodplain forest of the Los Angeles Basin formed one of the most biologically rich habitats in southern California. Willow, cottonwood, and sycamore, and dense underbrush of alder, hackberry, and shrubs once lined the Los Angeles River as it passed near present-day Downtown Los Angeles. Although historically most of the Los Angeles River was dry for at least part of the year, shallow bedrock in the Elysian Park area north of Downtown Los Angeles forced much of the river's underground water to the surface. This allowed for a steady year-round flow of



SOURCE: Google Map, 2015 (Aerial)

670 Mesquit

Figure IV.B-1
Aerial Photograph with Surrounding Land Uses

water through the area that later became Downtown Los Angeles. However, as previously discussed, the Project Site is within a completely developed area. A geotechnical study prepared for the Project indicates that the Project Site is likely underlain by what is described as fill. However, due to the age of the development, it is likely not imported fill, but represents a historic disturbance layer of up to 5 to 6 feet in depth, overlying alluvium.¹⁵ As discussed in detail in the Cultural Resources Assessment Report, fine-grained younger alluvium, such as is found within the Project Site, is considered to have a higher sensitivity for buried archaeological sites.

(2) Prehistoric Setting

As further discussed in the Cultural Resources Assessment Report, the earliest evidence of occupation in the Los Angeles area dates to at least 9,000 years before present (B.P.) and is associated with a period known as the Millingstone Cultural Horizon.^{16,17} Departing from the subsistence strategies of their nomadic big-game hunting predecessors, Millingstone populations established more permanent settlements. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating later than 5,000 years B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

Although many aspects of the Millingstone culture persisted, by 3,500 years B.P. a number of socioeconomic changes occurred.^{18,19,20} These changes are associated with the period known as the Intermediate Horizon.²¹ Increased populations in the region necessitated the intensification of existing terrestrial and marine resources.²²

The Late Prehistoric period, spanning from approximately 1,500 years B.P. to the mission era, is the period associated with the florescence of the contemporary Native American group known as the *Gabrielino*.²³ Occupying the southern Channel Islands and adjacent mainland areas of Los Angeles and Orange Counties, the *Gabrielino* are reported to have been second only to their Chumash neighbors in terms of population size and regional influence in California.²⁴ The *Gabrielino* are estimated to have numbered around 5,000 in the pre-contact period²⁵ and maps produced by early explorers indicate that at least 26

¹⁵ Twining Consulting, *Preliminary Geotechnical Engineering Evaluation Report: 670 Mesquit Mixed-Use Development, 658 & 670 Mesquit Street, Los Angeles, CA 90021*, May 25, 2018, p. 75.

¹⁶ Wallace, W. J., *A Suggested Chronology for Southern California Coastal Archaeology*, 1955, pp. 214 to 230.

¹⁷ Warren, C. N., *Cultural Traditions and Ecological Adaptation on the Southern California Coast*, 1968, pp. 1 to 14.

¹⁸ Erlandson, Jon M, *Early Hunter-Gatherers of the California Coast*, 1994.

¹⁹ Wallace, W. J., *A Suggested Chronology for Southern California Coastal Archaeology*, pp. 214 to 230.

²⁰ Warren, C. N., *Cultural Traditions and Ecological Adaptation on the Southern California Coast*, 1968, pages 1 to 14.

²¹ Wallace, W. J., *A Suggested Chronology for Southern California Coastal Archaeology*, pp. 214 to 230.

²² Erlandson, Jon M, *Early Hunter-Gatherers of the California Coast*, 1994.

²³ Wallace, W. J., *A Suggested Chronology for Southern California Coastal Archaeology*, pp. 214 to 230.

²⁴ Bean, L.J., and C.R. Smith, *Gabrielino*, in *California*, 1978, pp. 538 to 549.

²⁵ Kroeber, A. L., *Handbook of the Indians of California*, 1925.

Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river.²⁶

(3) Historical Setting

(a) *Historic Overview of the Project Vicinity*

On September 4, 1781, the *Pueblo de la Reina de Los Angeles* was established and consisted of a central square surrounded by 12 houses and a series of agricultural fields occupying 250 acres to the east between the town and the river.²⁷ An irrigation system (*Zanja*) that would carry water from the river to the fields and the pueblo was the first priority and was constructed almost immediately. According to historic maps²⁸ of Los Angeles, one branch of the *Zanja*, Conduit System (*Zanja* No. 1), is mapped as running north/south through Downtown Los Angeles, and located 0.16 miles west of the Project Site. By 1786, the flourishing pueblo attained self-sufficiency and funding by the Spanish government ceased. Fed by a steady supply of water and an expanding irrigation system, agriculture and ranching grew, and by the early 1800s the pueblo produced 47 cultigens. Among the most popular were grapes used for the production of wine. Vineyards blanketed the landscape between present-day San Pedro Street and the Los Angeles River. By 1830 an estimated 100,000 vines were being cultivated at 26 Los Angeles vineyards.

Early maps dating to 1850 depict the Project Vicinity as agricultural land used for wine grapes, vegetables, fruit and nut groves, and pasture land. By the mid-19th century, City officials established a system of water use fees and rules to govern the *zanjas*. Over 8,300 acres of land were being irrigated by the *zanjas* during the 1880s. While the *zanjas* worked well for irrigation, the water was frequently unsuitable for domestic purposes. As Southern California grew, the Los Angeles River became an inadequate supply of water; water supply reservoirs came into use and the *zanja* system was gradually abandoned and, in some cases, dismantled. By 1902, the Los Angeles municipal government took back jurisdiction of its own water needs and purchased the existing water system, which consisted of seven reservoirs and 337 miles of pipe. When these measures proved insufficient, a more permanent solution to Los Angeles' water shortage was sought. Under the direction of City engineer William Mulholland, the Los Angeles Bureau of Water Works and Supply constructed the 238-mile-long Los Angeles Aqueduct. This five-year project, completed in 1913, employed the labor of more than 5,000 men and brought millions of gallons of water into the San Fernando (now Van Norman) Reservoir²⁹

A majority of the Project Vicinity is located within the Wingerter Tracts, named after the first owner of the property, on the west side of the Los Angeles River. Additionally, portions of the Project Site extend north into the Goodwin Tract. Research of the Goodwin Tract did not reveal any specific information on who subdivided the area. Although it is

²⁶ Gumprecht, Blake, *Los Angeles River: Its Life, and Possible Rebirth*, 1999, reprinted 2001.

²⁷ Gumprecht, Blake, *Los Angeles River: Its Life, and Possible Rebirth*, 1999, reprinted 2001.

²⁸ V. J. Rowan and Theo. G. Koeberle, *Map of the City of Los Angeles*, 1887

²⁹ Gumprecht, Blake, *Los Angeles River: Its Life, and Possible Rebirth*, 1999, reprinted 2001.

not clear when each of the tracts was first subdivided, sales of the lots in the area are documented as early as 1893. The Baist Real Estate map from 1921 indicates the two tracts were developed by that time with a combination of large industrial buildings and smaller single- and multi-family residential buildings.

(b) *Historic Context – Industrial Development, 1850-1980*

SurveyLA is a comprehensive Citywide survey for identifying, recording, and evaluating historic properties and districts in Los Angeles. In order to evaluate identified resources, the City has developed historic contexts as a framework that describes important themes in the City's history and identifies representative property types and establishes standard registration requirements. Pertinent themes and sub-themes developed in SurveyLA Citywide Historic Context Statement (HCS) are utilized in accordance with the City's survey methods to provide a framework to evaluate the eligibility of identified resources within the Project Site which include the Los Angeles Ice and Cold Storage Company (Los Angeles Cold Storage Company) Warehouse Complex constructed in sections between 1908 and 1985 located in Survey Areas #3, #4, and #5, and the West Coast Quilting Company Factory constructed in 1963 located in Survey Area #1. The contexts and themes that are applicable to evaluation of the Los Angeles Ice and Cold Storage Company buildings on the Project Site in Survey Areas #3, #4, and #5, include the Context, Industrial Development, 1850-1980, the Theme, Agricultural Roots (1850-1945) and its associated Sub-Theme, From Farm to Market (1900-1960), and associated Property Type, Cold Storage Warehouse (1900-1945). The contexts and themes that are applicable to the West Coast Quilting Company Factory Building in Survey Area #1 is the Context, Industrial Development, 1850-1980, Sub-Context Manufacturing for the Masses (1887-1965) and its associated Property Type, Factory (1887-1980). These contexts and themes are summarized below and discussed in more detail in the Cultural Resources Assessment Report.³⁰

Industry and commerce in Los Angeles have their roots in agriculture, and the earliest industries were related to processing agricultural produce. Beyond agriculture, railroads were the most important catalyst for industrial growth in Los Angeles. The railroads provided an efficient means to transport goods throughout the region and to outside markets. The rise of manufacturing in Los Angeles began slowly in the late 19th century, fueled by an emerging consumer market created by waves of immigrants. The earliest industries generally consisted of small-scale operations for food processing and the building industry. The rapid population growth during the 1880s required industrial support in the form of building materials, produce, and consumer goods. The value of the cold storage facilities as storage places for perishable consumer goods would quickly be realized by the growing public. Cold storage facilities allowed local farmers to produce a surplus, turning their subsistence level operations into profitable businesses. The foundations of the thriving ice business and cold storage facilities of the early 20th century were laid over the course of the previous century, during which time the

³⁰ ESA, 670 Mesquit Project, *Cultural Resources Assessment Report*, December 2021.

processes for harvesting (later manufacturing), transporting, storing, and distributing ice were developed.³¹

(i) *Theme: Agricultural Roots, 1850-1945*

In large part because of this agricultural heritage, the earliest industries in what is now the downtown area of the City were related to processing agricultural produce. Flour mills were established in the 1870s and 1880s to process local grain. Packing houses opened along rail alignments to prepare citrus and deciduous fruits for shipment, and, during the late 19th century, several local wineries fermented Los Angeles grapes. To support the growing agricultural industry, cold storage facilities, were constructed throughout the City's growing industrial area.³²

(ii) *Sub-Theme: From Farm to Market, 1900-1960 and the Cold Storage Warehouse Property Type (1900-1945)*

From Farm to Market, 1900-1960, describes the historical context of this particular period in relation to the larger history of agricultural development in the area.

With the development of railroads came the possibility of shipping food long distances; ice was necessary for shipping, especially in Southern California where agriculture was abundant and demand was high.³³ Around the turn of the 20th century, emerging refrigeration technologies prompted companies to build ice plants and cold storage warehouses. Despite the high construction cost, centralized cold storage and ice manufacturing plants were vital links in the food supply chain. Additionally, the production of ice was necessary to keep food fresh in those establishments, as well as in the iceboxes of private homes.³⁴

The Cold Storage Warehouse Property Type (1900–1945) is an industrial property associated with the City's agricultural roots, during a distinct period of early twentieth-century development. Prevalent between 1900 and 1945, the Cold Storage Warehouse Property Type is a material representation of the link between the collection of agricultural goods from farms, fisheries, and ranches and their distribution to produce markets and food processors. Because of the City's rich agricultural heritage, the Cold Storage Warehouse Property Type was constructed in the industrial areas of Los Angeles adjacent to rail lines, produce markets, and other manufacturing industries to facilitate the movement of perishable goods within the City and to other parts of the United States. In the early 20th century, many of these cold storage warehouses focused on the production

³¹ SurveyLA, Los Angeles Citywide Historic Context Statement, Context: Industrial Development, 1850–1980, prepared by LSA Associates, Inc., September 2011; revised February 2018, pp. 4 and 53–60.

³² SurveyLA, Los Angeles Citywide Historic Context Statement, Context: Industrial Development, 1850–1980, prepared by LSA Associates, Inc., September 2011; revised February 2018, pp. 4 and 53–60.

³³ SurveyLA, Los Angeles Citywide Historic Context Statement, Context: Industrial Development, 1850–1980, prepared by LSA Associates, Inc., September 2011; revised February 2018, pp. 4 and 53–54.

³⁴ SurveyLA, Los Angeles Citywide Historic Context Statement, Context: Industrial Development, 1850–1980, prepared by LSA Associates, Inc., September 2011; revised February 2018, pp. 53–60.

of ice and provided cold storage on the side. Cold storage warehouses were examples of vernacular architecture, and the structures were purely functional, utilitarian designs devoid of excess decoration. The early cold storage warehouses were constructed of brick and were usually multiple stories plus a basement. The cold storage warehouse was an expression of the technology employed in its construction; the designers made no attempt to design in a particular style. Other features of the early cold storage warehouse included interior space divided into rooms dedicated to specific goods and loading docks, an essential component that enabled distribution.³⁵

(iii) *Sub-Context: Manufacturing for the Masses, 1887–1965, Factory Property Type (1887–1980)*

With the development of a deep water port in San Pedro, which connected Los Angeles with markets abroad, Los Angeles became the prime connection to overseas markets for Southern California. Civic boosters actively courted eastern and Midwestern manufacturers, enticing them to come west with promises of all-year production capabilities, an abundance of cheap energy, and willing workers who were unaffiliated with unions. With an abundance of cheap electricity from hydropower, the 20th century saw the proliferation of electricity and refrigeration, and a wide variety of new industries. The population booms of the 1920s and the post-WWII era, combined with a surge in the variety and novelty of consumer goods, produced an incredible inventory of new factories in Los Angeles making all manner of goods.

The term “factory” refers to an industrial building or small group of industrial buildings organized around a manufacturing process. A factory resource can be eligible for its historical or architectural significance as an example of a property type under a subtheme pertaining to a specific area of manufacturing. The Factory Property Type includes a wide range of buildings that may be specifically associated with food processing, automobile production, apparel, textiles, aircraft, or aerospace production. This property type can include a single workshop, a large plant, or a complex of related buildings. In general, intact factory buildings from the first half of the 20th century represent a brief but dramatic transition of Los Angeles from an agricultural town into a top-ranking industrial powerhouse. Factories may be historically significant if they are associated with well-known or demonstrably influential manufacturing enterprises or activities that represent the importance of manufacturing in the industrial, economic, or social history of Los Angeles. Factories may also be architecturally significant if they are an example of a style, method of construction, or a work of a noted architect or builder.³⁶

³⁵ SurveyLA, Los Angeles Citywide Historic Context Statement, Context: Industrial Development, 1850–1980, prepared by LSA Associates, Inc., September 2011; revised February 2018, pp. 65–67.

³⁶ SurveyLA, Los Angeles Citywide Historic Context Statement, Context: Industrial Development, 1850–1980, prepared by LSA Associates, Inc., September 2011; revised February 2018, pp. 120–121.

(4) Project Site-Specific History

This section presents a summary of the property history associated with the Project Site. To facilitate the presentation of this background material, the Project Site has been divided for the purpose of this analysis into eight Survey Areas as shown in **Figure IV.B-2, Aerial Photograph with Survey Area and Project Boundary**.

Existing improvements in Survey Areas #1, #2, #3, #4 and #5 consist of 10 connected buildings that were constructed in sections between 1908 and 2002 and today appear as one large cold storage warehouse building encompassing an irregular lot spanning several parcels located on the strip of land between the railroad and Mesquit Street, at 642 and 674 S. Mesquit Street (the Project Site) in Los Angeles.³⁷ Survey Areas #6, #7, and #8 are historically associated with the AT&SF railroad and are currently vacant.

Early maps from the 1850s to the 1870s do not depict the Project Site, likely because it was undeveloped, but, by 1887, the Project Site had been subdivided for development. In 1889, a year after its establishment, the Los Angeles Ice and Cold Storage Company in Survey Area #3 on the Project Site was handling over 750,000 pounds of pork products from the east coast each month, costing over \$10,000 in freight bills. The company urged local farmers to produce these products and take advantage of the storage facilities available. The original 1888 ice and cold storage plant for the Los Angeles Ice and Cold Storage Company was replaced in 1908 after it was destroyed by a fire, and the cold storage facilities were expanded into Survey Area #4. Improvements in Survey Area #5 began as early as 1909 with the construction of a single family residence owned by the Atchison, Topeka, and Santa Fe (AT&SF) Railroad. The residence was later demolished by 1922 for a concentrated fruit juice factory built by Hyland Stanford Company; however, the factory was later destroyed by fire and demolished to make room for a new cold storage facility constructed in 1985. Improvements in Survey Area #1 between 1907 and 1955 included a series of buildings constructed, modified and then demolished for Union Well Supply and Los Angeles Ice and Cold Storage Company; the parcel is currently improved with an altered industrial manufacturing building erected in 1963 for the West Coast Quilting Company that was remodeled for a cold storage warehouse by 2006. The existing cold storage improvements in Survey Area #2 were constructed in 2002. Summaries of the site development history for each of the eight survey areas is provided below.

(a) Survey Area #1 (APN 5461-018-009)

Survey Area #1 (670-689 S. Mesquit Street) was originally developed with industrial buildings as early as 1907. Between 1907 and 1955, a series of buildings were constructed, modified, and demolished. In 1961, the building currently within Survey Area #1, at 679 S. Mesquit Street, was constructed by the West Coast Quilting Company, which used the factory for offices and manufacturing purposes. In 2006, a building permit was filed to install new roofing materials, providing insulation supporting the building's

³⁷ *Los Angeles Herald*, Cold Storage, November 22, 1888, p. 2.

current use as a cold storage warehouse. Further research on the history of the West Coast Quilting Company did not reveal any specific information about the company or the products they produced. The building is now used by Rancho Cold Storage as a staging area for frozen and refrigerated goods. There is no manufacturing occurring in the building which has been modified to accommodate its current cold storage use.

(b) *Survey Area #2 (APN 5164-017-008)*

Beginning in 1908, permits for building improvements and alterations/repair at 690-694 S. Mesquit St. and 2135 E 7th St. were issued to owner Los Angeles Ice Cold Storage Company. However, by 1923, the previous improvements had been removed and a new reinforced concrete two-story plus basement Ice Tank and Storage building was erected, designed by architect John E. Kunsh for the same owner. Sometime before 1990 all of the improvements in Survey Area #2 were demolished. In July 1990 the parcel was vacant and a Certificate of Occupancy (COA) issued for the storage of trucks, and in November 1990 its use changed to an auto impound yard.³⁸ In 2000-2001, LADBS building records indicate the lot was undergoing grading and compaction, likely in preparation for construction of a new building. Survey Area #2, 2143 E. 7th Street, is currently improved with a cold storage warehouse constructed in 2002 according to a COA on file with the Los Angeles Department of Building and Safety (LADBS). Aerial images from 1994 and 2002 confirm the construction date presented in the COA. The building was not evaluated further because it does not meet the age threshold for consideration as a historical resource.

(c) *Survey Areas #3, #4, and #5 (APN 5164-017-003, 5164-017-002, 5164-017-006)*

The original ice and cold storage plant for the Los Angeles Ice and Cold Storage Company was located within Survey Area #3 at 674 S. Mesquit Street and began operation in May 1888.³⁹ The original \$75,000 ice and cold storage plant was designed by Kysor, Morgan, and Walls. The construction permits for the original cold storage plant are not available because LADBS records begin in 1905. However, a Sanborn Fire Insurance Map from 1888 depicts the original cold storage and ice manufacturing facilities. According to a 1908 building permit, after being destroyed by fire, the original ice and cold storage plant was replaced with a new building at 674 to 678 Mesquit Street approximately 80 feet by 96 feet in size that was designed by the architectural firm of Hunt, Eager & Burns and built for an estimated cost of \$15,000.

³⁸ An Application for Inspection of New Building and Certificate of Occupancy, No. 30800300219, issued November 9, 1990, for an Auto Impound Yard – Use of Land, indicates the unimproved lot was being used for parking in the early 1990s (1990LA66998). Application for Inspection of New Building and for Certificate of Occupancy, No. 29100300298, Storage of Trucks for Truck Driving School, issued July 2, 1990.

³⁹ *Los Angeles Herald*, Cold Storage, November 22, 1888, p. 2.



SOURCE: DigitalGlobe, 2016 (Aerial), ESa, 2018.

670 Mesquit Street

Figure IV.B-2
 Aerial Photograph with Survey Area
 and Project Boundary

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Expansion and alteration of the ice and cold storage plant for the Los Angeles Ice and Cold Storage Company is documented in numerous building permits that are characterized by incremental additions and structural upgrades over the years. Later updates of the Sanborn Fire Insurance Maps show that as the facility grew, it extended northward into Survey Area #4. In 1933, a series of repairs to the building's walls were undertaken due to damage from the Long Beach Earthquake. In the 1970s, a series of permits were filed to repair fire damage. In 1990, to comply with Division 88 of the Los Angeles Municipal Code pertaining to unreinforced masonry buildings constructed before 1934, the existing building underwent significant modifications including replacing the unreinforced masonry originally specified by Hunt, Eager, and Burns in 1908, with modern textured, concrete blocks. In its present condition, the 1908 building's exterior is completely unrecognizable due to over \$700,000 worth of required modifications. Furthermore, the buildings in Survey Area #4 cannot be differentiated from the buildings in Survey Area #3 due to the new concrete block exterior walls and Division 88 modifications.

Improvements in Survey Area #5 (APN: 5164-017-006) began as early as 1888 with one single family residence to the north of the original cold storage and ice manufacturing facility, that is depicted on the 1888 Sanborn. In 1894 an additional residence is depicted to the north of the first one. Both residences are gone by 1909. In 1909, one single-family residence owned by the Atchison, Topeka, and Santa Fe Railroad (AT&SF) is depicted on this parcel. The residence had been demolished by 1922, when a concentrated fruit juice factory was built by the Hyland Stanford Company on the site. The Hyland Stanford Company made significant contributions to the fruit processing industry through multiple patents registered in the company's name. Throughout the 20th century, the facilities were modified by subsequent owners including South Coast Packing Co. and Rancho Cold Storage. The buildings were ultimately destroyed by fire and a new 14,500-square-foot concrete block cold storage building was constructed in 1985.

(d) Survey Areas #6 and #7 (APN 5164-016-009 and 5164-016-010)

Survey Areas #6 and # 7 are small (3,708 square feet and 2,881 square feet, respectively), vacant parts of the Project Site adjacent to Survey Area #8. According to aerial photographs and Sanborn Fire Insurance Maps, two railroad-related buildings were built by AT&SF between 1923 and 1928, and a track servicing Mesquit and Jesse Streets passed between the buildings. Survey Areas #6 and #7 have been vacant since the railroad buildings were demolished between 1964 and 1977.

(e) Survey Area #8 (APN 5164-016-803)

Survey Area # 8 is a portion of a linear former railroad right-of-way (ROW) that spans from 6th Street to 7th Street and is adjacent to the Railway Properties. It lies to the west of the adjacent Railway Properties and within the Project Site itself. The first available map showing development on Survey Area #8 is an 1890 Sanborn Fire Insurance Map, which indicates that Survey Area #8 was a railroad ROW for the AT&SF Railroad. The

1906 Sanborn Fire Insurance Map indicates the AT&SF line was expanded, and tracks were added. Between 1983 and 1989, the tracks closest to the Project Site were reconfigured and some removed. According to the Los Angeles County Assessor's online Assessor Portal, Survey Area # 8 is a vacant State assessed tax exempt parcel.⁴⁰ It is presently in use for railroad storage.

(5) History of Properties Adjacent to the Project Site

There are several improvements situated adjacent to the Project Site that are over 45-years in age and may be impacted by the construction of the Project. These include the 7th Street Bridge, the Bailey Schmitz Building located at 2101 E. 7th Street, and the Railway Properties. While they are not a part of the Project Site, they are included because of potential physical or visual impacts.

(a) 7th Street Bridge

The 7th Street Bridge (Seventh Street Viaduct, Caltrans Bridge 53C-1321) which has been previously identified as CHRIS Resource 19-1754070, is located outside of the Project Site immediately adjacent to its southern boundary. The 7th Street Bridge was originally constructed between 1908 and 1910, under the oversight of the City Municipal Art Commission (Art Commission). Founded in 1903, part of the Art Commission's self-defined purview was the design of bridges crossing the Los Angeles River, and it believed the bridges should combine "artistic effect" with function.⁴¹ The few bridges then in existence that crossed the river in the downtown area were Victorian-era in age and of metal or wooden trestle or truss construction. They were meant to accommodate trolleys and trains and were increasingly inadequate for the traffic generated by the growth of Downtown Los Angeles. They were also prone to destruction by the periodic floods.

In 1907, the Art Commission enlisted a well-known Chicago-based landscape architect, Charles Mulford Robinson, to create a plan entitled the "Los Angeles: The City Beautiful," partly in response to the popular ideals of the City Beautiful Movement. This national movement, dating from the 1890s through the 1920s, was inspired by the "White City" of the 1893 World's Columbian Exposition in Chicago, that popularized the classically-derived architecture and planning ideals of the Beaux-Arts Style and resulted in the use of the style for public works projects and public buildings and spaces in American cities throughout the United States. The Art Commission's plan laid the foundation for a number of City improvements, including, ultimately, all of the monumental bridges across the Los Angeles River, City Hall, and Union Station.⁴² Initially, three bridges were planned by the Commission over the Los Angeles River: the Main Street Bridge (1910); the 7th Street Bridge (1908–1910); and the North Broadway Bridge (also known as the Buena Vista

⁴⁰ Los Angeles County Assessor, Online Assessor Portal, Parcel Detail for AIN 5164-0170803, <https://portal.assessor.lacounty.gov/parceldetail/5164017803>. Accessed August 9, 2019.

⁴¹ JRP Historical Consulting Corp, DPR 19-186112, 2004, p. 8.

⁴² JRP Historical Consulting Corp, DPR 19-186112, 2004, p. 9.

Bridge, 1911). The new bridges were constructed of concrete to withstand flooding and were designed in the Beaux-Arts style with symbolic surface decoration.

The primary impetus for the construction of the 7th Street Bridge was the rapidly growing population of the City and the need to connect the City with the Boyle Heights neighborhood across the river east of downtown. The City needed a transportation and bridge system that could move people more efficiently between home, work, commercial centers, and recreational destinations. To solve the City's transportation needs, electric railcar systems were developed. Real estate mogul Henry Huntington expanded the system by purchasing the Los Angeles Railway in 1898 and forming the Pacific Electric Railway Company in 1901.

By 1911, a series of mergers, including one with Edward H. Harriman of Southern Pacific Railroad, allowed Huntington to control virtually all electric rail passenger service in the Los Angeles area. Following the merger, Huntington was the largest owner of interurban railway passenger surface in the world and his Los Angeles Railway Company dominated transit in Los Angeles. Between 1908 and 1910, the Los Angeles Railway Company supplied the City with funds for the construction of the 7th Street Bridge, and it was completed in 1910.⁴³

The 7th Street Bridge was originally constructed as a reinforced concrete, closed-spandrel, arch bridge over the Los Angeles River. Designing bridges that could withstand the then un-channelized river's seasonal variations in water level and flow was a major engineering challenge; "unpredictable flooding and shifting sands and gravel made fixing the locations of firm foundations, piers, and abutments a very difficult task. River scour, the rock and debris collected and pushed down the river channel by raging waters, was a threat recognized by bridge engineers."⁴⁴ The foundations of the 7th Street Bridge ultimately had to be sunk 10 feet below the original specifications in response to riverbed scour and the consequences of upstream aggregate mining, which was aggressively practiced by city contractors until it was eventually outlawed. By 1911, the Buena Vista Viaduct, 7th Street Bridge, and Main Street Bridge were in operation, and Huntington's railways were an essential link between Downtown Los Angeles and outlying areas.⁴⁵

The 7th Street Bridge was the third of 15 bridges built by the City across the Los Angeles River between 1910 and 1934; it was the last one constructed without grade separation for rail and automobiles. The AT&SF rail tracks were at grade along the western bank of the Los Angeles River, running perpendicular to 7th Street and interrupting the flow of traffic across the 7th Street Bridge. Likewise, the Salt Lake Railroad lines on the eastern bank, one of which served as the entrance to the freight yard to the north and was heavily used by freight cars, was also at grade on the eastern riverbank. The original design of

⁴³ Railroad Commission of the State of California, *Report on Railroad Grade Crossing Elimination and Passenger and Freight Terminals in Los Angeles*, 1920.

⁴⁴ National Park Service. *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, p. 30.

⁴⁵ National Park Service. *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, p. 9.

the 7th Street Bridge made no attempt to grade-separate the road from the rail lines on either side of the river.⁴⁶

In the 1920s, the City approved the “Major Traffic Street Plan of 1924” which authorized the construction of additional bridges over the Los Angeles River, including a new automobile deck for the 7th Street Bridge that allowed for additional height for trains passing under the bridge.⁴⁷ The California Railroad Commission and the City considered two options in 1918 for redesigning the 7th Street Bridge: depress the railroad tracks on either side of the bridge and elevate the bridge over the tracks, or elevate the railroad tracks over the bridge.⁴⁸ The City chose to depress the tracks as the cheaper option and to avoid the creation of a steep grade for trains approaching and departing the 7th Street Bridge.⁴⁹

The chosen plan also called for the extension of the 7th Street Bridge with additional bents and decking to allow it to pass over the rail lines on either bank of the river. In 1927, the 7th Street Bridge was retrofitted and a second, upper deck was added above the original trolley deck, to accommodate heavier automobile traffic. Construction of the second deck required excavating the trenches of the old deck, installing new support bents, attaching shear walls to abutments, filling in the historic railings on the original lower deck, and extending the approaches passing over the railroad tracks.⁵⁰

In 1986, the 7th Street Bridge was evaluated as part of the Caltrans Statewide Historic Bridge Inventory conducted for the Federal Highway Administration, and it was determined eligible for the National Register as an example of a concrete arch bridge.⁵¹ Because it was determined eligible to the National Register at this time, it also was automatically listed on the California Register as is standard for all determinations of eligibility in the State. In the 1990s, the 7th Street Bridge underwent seismic retrofitting. At this time, the original historic railings on the upper deck, which were previously filled in, were replaced in-kind to match their 1927 appearance. Today, a large number of the railings on the upper deck of the 7th Street Bridge have been replaced in-kind in accordance with the Secretary of Interior Standards and are, therefore, considered character-defining elements of the bridge. There are approximately 1,475 linear feet and 1,222 linear feet of this character-defining railing on the south and north side of the 7th Street Bridge, respectively, for a total of 2,697 total linear feet of character-defining railing. In 2008, approximately a decade after the 7th Street Bridge’s seismic retrofitting in the 1990s, which included the reconstruction of some of the character-defining elements of

⁴⁶ Railroad Commission of the State of California, *Report on Railroad Grade Crossing Elimination and Passenger and Freight Terminals in Los Angeles*.

⁴⁷ Railroad Commission of the State of California, *Report on Railroad Grade Crossing Elimination and Passenger and Freight Terminals in Los Angeles*.

⁴⁸ Railroad Commission of the State of California, *Report on Railroad Grade Crossing Elimination and Passenger and Freight Terminals in Los Angeles*.

⁴⁹ National Park Service, HAER CA-271: Los Angeles River Bridges Recording Project, 2000, p. 10.

⁵⁰ National Park Service, HAER CA-271: Los Angeles River Bridges Recording Project.

⁵¹ Caltrans, Caltrans Statewide Historic Bridge Inventory, Structure & Maintenance Investigations, Historical Significance-Local Agency Bridges, District 07, Seventh Street Viaduct, Bridge 53C-1321, July 2018.

the bridge such as its railings, the bridge was designated a City of Los Angeles HCM in addition to its status as a historical resource previously determined eligible to the National Register and eligible to the California Register.⁵²

(b) *Bailey Schmitz Co. Building, 2101 E. 7th Street*

Located at 2101 E. 7th Street, directly adjacent to the Project Site, is a two-story utilitarian industrial building, formerly known as the Bailey Schmitz Co. The building has not been previously surveyed or evaluated. The brick three-story industrial building is currently used for artist's lofts and is situated at the intersection of 7th Street and S. Santa Fe Avenue adjacent to the Project Site. Los Angeles County Assessor records indicate that the unreinforced masonry building was constructed in 1910. According to Davison's 1919 Mattress Directory, the Bailey Schmitz Co., Inc., was a manufacturer of mattress batting and felt in Los Angeles at 7th Street and Santa Fe Avenue. Sanborn Fire Insurance Maps from 1950, 1951, and 1955 show the building continued to be occupied by Bailey Schmitz Co., Inc., mattress manufacturer, through the 1950s. Review of City building permits indicate the building was substantially altered over the years with numerous permits for additions, alterations and repairs on file. The Bailey Schmitz Co. continued to own the building until 1983. The building appears to have been seismically upgraded and renovated for its current multi-family live-work residential use. The fenestration has been replaced with new windows and doors; a new fire escape has been added to the rear east elevation; the brickwork along the ground-floor level on the south and west façades has been painted; and warehouse door openings have been closed (bricked over) on the south façade. Remnants of a painted sign on the building's cornice are cut off at the top due to a "parapet correction" in 1966, according to building permit. The painted sign appears to read "Bailey Schmitz Co. Inc." Remnants of another painted sign on the south façade between the second and third stories indicates the building was once a wholesale warehouse. The building is over 45 years in age and is located within the Community Plan Area surveyed in 2016 by SurveyLA. It was not identified as an individually eligible resource or as a contributor to a potentially eligible historic district by SurveyLA. Furthermore, the record search results did not identify any previous evaluations of the building. It is not located within a known historic district. Substantial alterations have materially impaired its historic and architectural integrity and it appears ineligible as a historical resource.

(c) *Railway Properties*

The Project Site is bordered on the east by freight and passenger rail lines and rail yards (Railway Properties) owned by National Railroad Passenger Corporation (Amtrak), BNSF Railway Company (BNSF), and the Los Angeles County Metropolitan Transportation Authority (Metro).

In 1859, the Kansas legislature chartered the Atchison, Topeka Railroad Company, soon known as the AT&SF. Within California, the AT&SF began construction in 1881 under the

⁵² National Park Service, HAER CA-271: Los Angeles River Bridges Recording Project, p. 26.

original California Southern Railroad Company, which was acquired by the AT&SF in 1885. In 1885, the California Southern Line was extended from San Bernardino to Barstow to meet up with the Atlantic & Pacific Railroad, which “was jointly owned by the Santa Fe and the St. Louis & San Francisco Railroad Companies.”⁵³ Once completed, AT&SF provided service from Kansas City to Los Angeles. In 1886, the AT&SF expanded their operation in the City and was granted a 50-foot right-of-way by the City to build a flood embankment near the current 1st Street Bridge. AT&SF laid additional tracks, and, by 1890, Santa Fe Avenue was created.⁵⁴ In 1893, to better cater to passenger traffic, the AT&SF constructed the Moorish Revival-style La Grande Railroad Station at the corner of East 2nd Street and Santa Fe Avenue, just south of the 1st Street Bridge. In 1906, to better outfit the growing demand of freight trains, the AT&SF built its first freight depot.

The AT&SF ceased operation in 1996 when it merged with the Burlington Northern Railroad, and formed the BNSF. In 2001, Sci-Arc school of architecture rehabilitated and moved to the Santa Fe Freight Depot designed by Harrison Albright. In 2006, the Santa Fe Freight Depot was listed on the National Register (NRHP #05001488). The Santa Fe Freight Depot is located approximately a half-mile northwest from the Project Site, north of E. 4th Street, and would not be affected by the Project. Today, the Railway Properties adjacent to the Project Site consist of several lines of active trackage along the west bank of the Los Angeles River (see Figure IV.B-2). The BNSF uses the railroad lines primarily for freight trains, while the other tracks are utilized by Amtrak and Metro for passenger trains. The Railway Properties range in width from 153 feet near 6th Street to 200 feet at its widest point at the approximate midpoint of the Project Site, and 190 feet at 7th Street. Adjacent to the northern end of the Project Site, near 6th Street, there are nine tracks, which expand to eleven tracks towards the 7th Street Bridge. As stated in Chapter II, *Project Description*, the Applicant seeks to construct a Deck that extends over a portion of the off-site Railway Properties east of the Project Site. Under the Project with the Deck Concept, the Project Site would include the Railway Properties.

As further detailed in the Cultural Resources Assessment Report, the Railway Properties adjacent to the Project Site have undergone extensive upgrades and do not retain integrity. The gravel bed and railroad tracks appear to be entirely replaced with new material and no evidence of historic period features or materials appears to be present. Because the Railway Properties adjacent to the Project Site do not retain integrity, they do not contribute to the eligibility of the BNSF Railroad and the Union Pacific Railroad and Southern Pacific Railroad as a whole. Therefore, the adjacent Railway Properties are non-contributing segments of these historical resources. Since the Railway Properties adjacent to the Project Site are considered non-contributing segments of the historical

⁵³ Holterhoff Jr., G. *Historical Review of the Atchison, Topeka and Santa Fe Railway Company (with Particular Reference to California Lines)*, furnished to the Railroad Commission of the State of California. Los Angeles, California, June 1914.

⁵⁴ McAvoy, Christy Johnson and Frank F. Parrello. “Santa Fe Freight Depot National Register of Historic Places Nomination.” January 3, 2006.

resources (BNSF Railroad, and Union Pacific Railroad and Southern Pacific Railroad), no further analysis is required.

3. Archival Research

Historic architectural and archaeological archival research involved a review of the National Register and its annual updates, the California Register, the Statewide Historical Resources Inventory (HRI) database maintained by the State Office of Historic Preservation (OHP), the City of Los Angeles's list of HCM designations, and the citywide inventory of historic properties (SurveyLA) to identify any previously recorded properties within or near the Project Site, as well as environmental review assessments for other projects in the vicinity. None of the buildings on the Project Site were previously identified as significant historical resources in SurveyLA's findings for the Community Plan area. In order to evaluate the buildings on the Project Site, applicable Context/Theme/Property Type eligibility standards formulated for SurveyLA were identified. Moreover, site-specific research on the properties within the Project vicinity was conducted, utilizing and reviewing building permits, Sanborn Fire Insurance Maps, City directories, historical photographs, California Index,⁵⁵ Avery Index,⁵⁶ Online Archive of California, Calisphere,⁵⁷ California State Archives, California State Library, USCB Frame Finder (aerial imagery),⁵⁸ historic newspapers, and other published sources. Research was conducted at the Los Angeles Public Library, LADBS, and Los Angeles County Assessor. The Project Site is also the subject of a geotechnical study,⁵⁹ which was reviewed and incorporated into the general site analysis and geoarchaeological review.

a) South Central Coastal Information Center Records Search

A California Historical Resources Information System (CHRIS) records search for the Project Site was conducted on January 24, 2018 at the South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. The records search included a review of all previously recorded archaeological resources and historic architectural resources within the Project Site and a 0.5-mile radius of the Project Site. The records search also included a review of California Points of Historical Interest, California Historical Landmarks, the California Register, the National Register, the

⁵⁵ The California Index is a database that contains information about people, places, and events that have impacted life in Southern California and is available online through the Los Angeles Public Library, <https://www.lapl.org/collections-resources/lapl-indexes/california-index>. Accessed August 10, 2019.

⁵⁶ The Avery Index to Architectural Periodicals, Avery Architectural and Fine Arts Library, Columbia University, New York City, New York.

⁵⁷ Calisphere is a database of the digital collections of the University of California's libraries, archives and museums and other educational and cultural heritage institutions in California, <https://calisphere.org/>. Accessed August 10, 2019.

⁵⁸ UCSB Library Aerial Photography Collections, <https://www.library.ucsb.edu/src/collections-aerial-photography>. Accessed August 10, 2019.

⁵⁹ Twining Consulting, *Preliminary Geotechnical Engineering Evaluation Report*.

California State Historic Resources Inventory listings, the City of Los Angeles HCM designations, and resources recorded by SurveyLA.

(1) Previous Cultural Resources Investigations

The records search results indicate that 33 cultural resources studies have been conducted within a 0.5-mile radius of the Project Site. Approximately 75 percent of the 0.5-mile records search radius has been included in previous cultural resources studies. Of the 33 previous studies, eight (LA-4834, -8252, -10506, -10887, -11048, -11409, -11642, and -11785) overlap the Project Site.

(a) *Previously Recorded Cultural Resources*

The records search results indicate that 16 cultural resources have been previously recorded within a 0.5-mile radius of the Project Site, including 11 historic architectural resources and five archaeological sites.

(b) *Previously Recorded Historic Architectural Resources*

The 11 historic architectural resources recorded in the Project area consist of nine buildings and two structures, none of which are located on the Project Site. One designated structure, the 6th Street Bridge, has been demolished since the time it was recorded. Of the remaining 10 historic architectural resources, two are eligible historical resources (Engine Co. #17 and H.J. Heinz Co. Warehouse) and two are designated historical resources (7th Street Bridge and the National Biscuit Company Building). A detailed listing of the previously recorded historic architectural resources is provided in Appendix D of this Draft EIR.

(c) *Previously Recorded Archaeological Resources*

All of the five previously recorded archaeological resources are historic-period archaeological sites. Three historic archaeological sites consisting of historic refuse scatter, a city block with historic refuse, and a historic road were not evaluated for listing by the original recorder. Two archaeological resources—segments of the historic alignments of the Union Pacific Railroad, Southern Pacific Railroad, Los Angeles Division and the BNSF Railroad—were evaluated and found to lack integrity to contribute to the eligibility of these resources for the National or California Registers. None of the five archaeological resources are located within the Project Site; however, the BNSF Railroad and the Union Pacific Railroad, and Southern Pacific Railroad, Los Angeles Division are adjacent to the Project Site. A detailed listing of the previously recorded archaeological resources is provided in Appendix D of this Draft EIR.

(d) *Resources Adjacent the Project Site*

(i) *7th Street Bridge (CHRIS Resource P-19-175070)*

The 7th Street Bridge (Seventh Street Viaduct, Caltrans Bridge 53C-1321, CHRIS Resource 19-1754070) is located at the south end of the Project Site. The 7th Street

Bridge was previously evaluated as part of the Caltrans Statewide Historic Bridge Inventory conducted for the Federal Highway Administration, and it was determined eligible for the National Register in October 1986 as an example of a concrete arch bridge. It is included in a thematic group of significant bridges across the Los Angeles River. Because it was determined eligible to the National Register, it also was automatically listed on the California Register as is standard for all determinations of eligibility in the State.⁶⁰ Therefore, it was assigned a status code of “2S2.” The 7th Street Bridge was surveyed by the City of Los Angeles’ Office of Historic Resources in 2007 and was adopted and listed as HCM No. 904 in 2008; therefore, it was assigned an additional status code of “5S1” to correspond to this later designation at the local level.

The appearance of the existing 7th Street Bridge is a result of its unique construction history. The 7th Street Bridge is currently an amalgam of the original circa 1910 closed spandrel arch construction, the bents of the 1918 additions over the railroad tracks, and the 1927 “simply supported reinforced concrete bridge built on top of the earlier span.”⁶¹ It was originally constructed between 1908 and 1910 by Henry Huntington’s Los Angeles Railway company as a reinforced concrete closed-spandrel arch bridge of three 80-foot clear spans to support the railcar system. At the time, the bridge deck was at the same grade as the rail lines, which intersected the approaches to the 7th Street Bridge on either side with railroad crossings. This conflict led to its redesign in 1918, when the railroad tracks on either side of the 7th Street Bridge were depressed and the bridge extended over the tracks, and additional bents and decking were added to allow freight and passenger traffic under the bridge so as not disrupt traffic. In 1927, the 7th Street Bridge was retrofitted and a second, upper deck was added above the original trolley deck to accommodate heavier automobile traffic. The 7th Street Bridge was incorporated into a longer viaduct designed by City engineer, Merrill Butler, who used the bridge as a base upon which to pour concrete piers to support the girder spans for the longer viaduct, which accounts for its present double-decked appearance. Construction of the second deck required excavating the trenches of the old deck, installing new support bents, attaching shear walls to abutments, filling in the historic railings on the original lower deck, and extending the approaches passing over the railroad tracks.⁶² In the 1990s, the 7th Street Bridge underwent seismic retrofitting, and portions of the railings on the upper deck were replaced in-kind to their 1927 appearance so that they are once again considered character-defining elements of the bridge. Today, the 7th Street Bridge is a double-deck bridge with Beaux-Arts style elements that is comprised of a lower reinforced concrete closed-spandrel arch bridge and an upper reinforced open-spandrel concrete bridge built atop the original bridge.

⁶⁰ Caltrans, Caltrans Statewide Historic Bridge Inventory, Structure & Maintenance Investigations, Historical Significance-Local Agency Bridges, District 07, Seventh Street Viaduct, Bridge 53C-1321, July 2018.

⁶¹ National Park Service, HAER CA-271: Los Angeles River Bridges Recording Project, p. 26.

⁶² National Park Service, HAER CA-271: Los Angeles River Bridges Recording Project, p. 26.

(ii) *Burlington Northern & Santa Fe Railroad, Atchison
Topeka & Santa Fe Railroad (Resource P-19-186804)*

The Project Site is bordered on the east by the Railway Properties, with the Los Angeles River to the east, although, under the Project with the Deck Concept, this area is part of the Project Site. The BNSF Railroad is adjacent to the Project Site and is a subarea of the Railway Properties (see Figure II-14 in Chapter II, *Project Description*, of this Draft EIR). The BNSF trackage is historic in age and was recorded as 19-186804 in the CHRIS system. It was originally the transcontinental AT&SF Railroad and then later became the BNSF Railroad, as described above. The record does not document or evaluate the full extent of the larger transcontinental BNSF railroad; instead, smaller segments have been recorded on a project-by-project basis. In 2007, a study was undertaken that evaluated the segment of the BNSF right-of-way that includes the portion on the Railway Properties.⁶³ The study found the segment to be part of the larger BNSF railroad system and stated that it was modestly recognizable as the original BNSF rail line; however, its tracks have been consistently reconfigured and altered by maintenance for more than 100 years. Because of the changes, the study concluded that the landscape had also changed considerably in the last century and the segment of the BNSF rail right-of-way in question, including the portion within the Railway Properties, no longer retained integrity of setting. It was assigned a 6Z status, indicating that the segment is not eligible for listing as a contributor to the historical resource at the national, state, or local levels under applicable criteria.

Although the entire railroad line is likely eligible for the National Register and California Register, the segment encompassed by the Railway Properties does not itself retain sufficient integrity to qualify as contributing and, therefore, does not require further consideration under CEQA.

As part of the preparation of the Cultural Resources Assessment Report prepared for the Project, verification was made that the resource was unchanged from the previous survey and evaluation (19-186804) conducted in 2007.⁶⁴ The railway segment within the Railway Properties was confirmed to have undergone extensive upgrades and indeed does not retain integrity. The gravel bed and railroad tracks appear to be entirely replaced with new material, and no evidence of historic period features or materials appears to be present. Because this railroad segment does not retain integrity, it does not contribute to the eligibility of the historical resource under CEQA, and does not have enough integrity to contribute to the eligibility of the BNSF railroad system as a whole. Therefore, this railway segment is non-contributing to the BNSF Railroad as a whole. Because the BNSF

⁶³ Smith, Francesca and Harper, Caprice, Site Record for Burlington Northern & Santa Fe Railroad, P-19-186804. Site record on file: South Central Coastal Information Center, California State University, Fullerton, 2007.

⁶⁴ Smith, Francesca and Harper, Caprice, Site Record for Burlington Northern & Santa Fe Railroad, P-19-186804. Site record on file: South Central Coastal Information Center, California State University, Fullerton, 2007.

Railroad alignment adjacent to the Project Site is a non-contributing segment of the historical resource, is not considered further in this analysis.

(iii) *Union Pacific Railroad, Southern Pacific Railroad, Los Angeles Division (Resource P-19-186112)*

The Project Site is bordered on the south by a former section of the Union Pacific Railroad and Southern Pacific Railroad, Los Angeles Division, which ran down 7th Street. The record for the Los Angeles Division was recorded based on mapping and only a section of the segment was examined. While it is no longer visible in this location south of the Project Site, it is possible that it is still extant under the pavement but unknown at this time. It was assigned a 6Z status, indicating that the segment does not appear to contribute to the eligibility of the Union Pacific Railroad and Southern Pacific Railroad, Los Angeles Division, as a historical resource at the national, state, or local levels under applicable criteria.

(iv) *6th Street Bridge (Resource P-19-188524)*

The 6th Street Bridge (1932) was demolished in 2016 but was originally located on 6th Street between Mateo Street and S. Boyle Avenue, adjacent to the Project Site's north boundary. It was previously determined eligible for the National Register and listed in the California Register. It was also designated Caltrans Bridge 53C1880 and HCM No. 905, the 6th Street Bridge (Viaduct) was an important engineering landmark in the City of Los Angeles, with an overall length of 3,500 feet it was the longest of a set of 14 historic Los Angeles River crossing structures. The concrete in the 6th Street Bridge had been subject to Alkali Silica Reaction (ASR) causing significant deterioration of the structure.⁶⁵ A new bridge is expected to be complete in its place in 2022, extending nearly a mile from Boyle Heights over the Los Angeles River and into downtown.⁶⁶

b) Other Identified Resources in the Project Vicinity

Since the Project Site is located within a dense industrial setting with limited visibility, the archival records search encompassed a 0.25-mile radius to capture all known resources within the Project Site's vicinity, which may have views of the Project Site for the purpose of analyzing potential indirect impacts to historical resources.

Four (4) known potentially eligible, eligible, or designated individual historic architectural resources were identified within 0.25 miles of the Project Site beyond the adjacent properties identified above:

- 777 Santa Fe Avenue and 2046 E. 7th Street (7th & Santa Fe), the Ford Motor Company Factory Building was built in 1914. It is located approximately 0.09 miles

⁶⁵ Kevin Break, "6th Street Bridge – Sixth Street; Queen of the LA Bridges!", www.6thstreetbridge.com, January 28, 2020. Accessed April 23, 2021.

⁶⁶ Joe Linton, "Eyes on the Street: New Arches on the Sixth Street Bridge," [StreetsBlogLA](https://la.streetsblog.org/2020/10/27/eyes-on-the-street-new-arches-on-the-sixth-street-bridge/), October 27, 2020, <https://la.streetsblog.org/2020/10/27/eyes-on-the-street-new-arches-on-the-sixth-street-bridge/>. Accessed April 23, 2021.

(475.2 feet) to the southwest of the Project Site, on the southwest corner of the intersection of 7th Street and S. Santa Fe Avenue. It was identified as a known historical resource in the 2143 Violet Initial Study – Environmental Checklist (Case Number: ENV-2017-438-EIR) (City of Los Angeles Department of City Planning 2018, page B-13). The Ford Motor Company Plant is noted in the SurveyLA Citywide Historic Context Statement as the only extant automobile manufacturing-related resource left in Los Angeles. It was recently rehabilitated and determined eligible for the National Register.⁶⁷ There is a direct view from the Ford Motor Company Factory Building northeast toward the Project Site from the north façade of the building at the southwest corner of S. Santa Fe Avenue and 7th Street.

- 1820 E. Industrial Street, the National Biscuit Company Building, HCM No. 888, was built in 1925 and is located approximately 0.20 miles (1,059 feet) to the northwest of the Project Site within the Downtown Los Angeles Industrial Historic District. There are no views of the Project Site from this location.
- 19-188985, Engine Co. #17, 708 S. Santa Fe Avenue (3S) was built in 1927 and is located approximately 0.05 miles (250 feet) southwest of the Project Site and south of E. 7th Street. The building is oriented west facing S. Santa Fe Avenue and is separated from the Project Site by intervening development. There are no views of the Project Site from the west front façade of the building at this location.
- 19-188986, H. J. Heinz Co. Warehouse, 712 S. Santa Fe Avenue (3S) was built in 1912 and is located approximately 0.06 miles (300 feet) southwest of the Project Site and south of E. 7th Street. The building is oriented facing west toward S. Santa Fe Avenue and is separated from the Project Site by intervening development. There are no views of the Project Site from the west front façade of the building at this location, which faces Santa Fe Avenue.

One (1) potential historic district was identified by SurveyLA as eligible for the National Register (3S), California Register (3CS), and local listing as an HCM (5S3):

- Downtown Los Angeles Industrial Historic District, which does not overlap with the Project Site, is generally bounded by E. 1st Street on the north, Santa Fe Avenue and Mateo Street on the east, E. 7th Street on the south, and S. Alameda Street on the west. The majority of the district is located between 0.25 miles to 0.80 miles northwest of the Project Site and is separated from the Project Site by intervening industrial development. There are three contributing buildings at the southeast corner of the District along Mateo Street and Industrial Street within approximately 0.25 miles of the Project Site:
 - 635 S. Mateo Street, Romanesque/Gothic Revival style commercial-office, low-rise building, built in 1929 approximately 0.20 miles (1,056 feet) to the northwest of the Project Site; no view of the Project Site.
 - 1820 E. Industrial Street, National Biscuit Company (HCM No. 888), a Beaux-Arts style industrial food-processing and bakery building, built in 1925

⁶⁷ SurveyLA, Los Angeles Citywide Historic Context Statement, Context: Industrial Development, 1850–1980, prepared by LSA Associates, Inc., September 2011; revised February 2018, pp. 151–153.

- approximately 0.20 miles (1,056 feet) to the northwest of the Project Site; no view of the Project Site. Both a district contributor and an individually eligible resource (see above); no view of the project site.
- 1855 E. Industrial Street, vernacular/Neoclassical industrial-storage/warehouse building, built in 1924 approximately 0.20 miles (1,059 feet) to the northwest of the Project Site; no view of the Project Site.

c) Sacred Lands File Search

The NAHC maintains a confidential Sacred Lands File (SLF) that lists sites of traditional, cultural, or religious value to the Native American community. In some instances, these sites can qualify as historical resources or unique archaeological resources under CEQA. ESA contacted the NAHC on March 15, 2018, to request a search of the SLF. The NAHC responded to the request in a letter dated March 16, 2018. The results of the NAHC SLF search indicate that Native American cultural resources are not known to be located within the Project Site; however, the area is considered sensitive for cultural resources. Assembly Bill 52 (AB 52) consultation conducted for the Project is separately documented in the *670 Mesquit Project, City of Los Angeles, Tribal Cultural Resources Technical Report*, provided in Appendix N in this Draft EIR.

d) Survey Results and Significance Evaluation

(1) Archaeological Resources Survey Results

On March 16, 2018, ESA staff Henry Chodsky, B.A., conducted an archaeological resources survey that focused on identifying surface evidence of archaeological resources within the Project Site. Areas with visible ground surface were subject to pedestrian survey using transect intervals spaced no more than 15 meters (approximately 50 feet) apart. Access was not available to the adjacent Railway Properties, but this area was viewed and photographed from the Project Site and 7th Street Bridge. No surface evidence of archaeological resources was encountered as a result of the survey.

(2) Historic Architectural Resources Survey

A historical resources survey aimed at identifying potentially eligible buildings and structures 45 years or older within the Project Site for compliance with CEQA was conducted on November 17, 2016, by Senior Architectural Historian Christian Taylor, M.H.P. A second survey was conducted on April 5, 2018, by architectural historians Margarita Jerabek-Bray, Ph.D., Christian Taylor, M.H.P., and Ashley Brown, M.A. to identify any eligible or listed buildings and structures that qualify as historical resources adjacent to the Project Site that could be subject to indirect impacts pursuant to CEQA. Existing on-site buildings and structures, as well as the adjacent surroundings, were photographed to document existing conditions and update previous survey results if changes were observed, as required. The results of the historic architectural resources survey and significance evaluation for resources on the Project Site are categorized by Survey Area and summarized below. Survey results and significance evaluations of

adjacent resources are also summarized below. Detailed documentation and evaluation of each resource surveyed is provided in Appendix D of this Draft EIR.

(3) Significance Evaluation of On-Site Resources

Historical resources investigations were conducted to determine whether any potentially eligible historical resources exist within the Project Site. As a result of these investigations, summarized below, it was found that there are no on-site resources extant within the Project Site.

(a) *Survey Area #1*

Within the Project Site, the one-story utilitarian industrial L-shaped concrete building at 689 S. Mesquit Street in Survey Area #1 (APN 5461-018-009), was completed in 1963 when a Certificate of Occupancy was issued to the West Coast Quilting Company (presently Rancho Cold Storage) for a one-story, type III-B, 120-by-178-foot office and manufacturing facility with 41 parking spaces. The existing building replaced previous mixed commercial/industrial structures that had occupied the site as early as 1907. Various owner/occupants of the site over the years included Union Well Supply Co., California Consumers Corp., and the Los Angeles Ice and Cold Storage Company. The 1951 Sanborn map shows that the parcel was served by a railroad spur and improved at the time with warehouse, storage and auto painting facilities. Previous improvements were demolished in 1955 prior to the construction of the existing industrial manufacturing building that was completed in 1963. The existing building has exterior concrete block and reinforced concrete walls, and a flat roof with parapets. The building occupies half of the lot and the remainder of the lot is paved with asphalt and is used for vehicular parking and loading. The primary entrance (north elevation) is dominated by a three-bay loading dock, and the building's primary entrance is at the corner to the left of the loading bays. The primary entrance provides access to the building's office space and exhibits some minor decorative articulation characteristic of the Mid-Century Modern style including a decorative wall of stacked brick (painted over) and a flat projecting canopy supported by three projecting L-shaped metal beams (later alteration) that along with a concrete planter creates a small outdoor entrance porch. The front entrance has a fully glazed aluminum framed door with sidelights and transoms, fortified with metal security bars and screens (alteration). The rest of the building is utilitarian in character with painted concrete walls, rectangular metal multi-light industrial windows and large rectangular warehouse door openings.

The West Coast Quilting Company factory (Rancho Cold Storage) building at 689 S. Mesquit Street was evaluated under the Industrial Development Context (1850-1980) for potential eligibility under Criteria A/1/1 and C/3/3 for its association with the Sub-Context Manufacturing for the Masses (1887-1965) as an example of the Factory Property Type (1887-1980). Originally constructed for the West Coast Quilting Company, the existing building currently does not retain any characteristic features that convey its original factory use. Furthermore, research results do not indicate that the West Coast Quilting Company was a historically significant manufacturer in Los Angeles. The original

industrial manufacturing building was substantially altered when it was converted from a factory to a cold storage warehouse in or by 2006 and it does not currently have intact character-defining features and integrity to convey its original function as a manufacturing facility. On June 2, 2006, a building permit was issued to owner Frank H. Gallo and applicant Stuart Baltz, for removal of the existing roof materials and installation of a new spray polyurethane foam and elastomeric coating roofing system, providing insulation supporting the building's current use as a cold storage warehouse. The building was likely modified for use as a cold storage warehouse at or by this time (2006). The building is presently used by Rancho Cold Storage as a staging area for frozen and refrigerated goods. The building has been modified with new interior partitions and insulation materials to accommodate its current use as a cold storage warehouse. There is no manufacturing occurring in the building at this time. Therefore, due to lack of significance and integrity, the existing utilitarian industrial building at 689 S. Mesquit Street in Survey Area #1 (APN 5461-018-009) appears to be ineligible as a historical resource under CEQA.

(b) Survey Area #2

Survey Area #2, 2143 E. 7th Street (APN: 5164-017-008), is improved with a cold storage warehouse constructed in 2002. As stated in the Regulatory Setting subsection above, the National Register requires that properties be at least 50 years of age to be eligible, while the California Register recommends evaluation for properties 45 years or older. Since this building was constructed in 2002, it does not meet the age thresholds for consideration as a historic resource under the National Register (50 years) or California Register (45 years), and therefore is not eligible for listing on either registers. Also, as stated above in the Regulatory Setting subsection, pursuant to the National Park Service Criteria Consideration G, properties of less than 50 years of age may be eligible for listing on the National Register if it can be clearly established that they are of exceptional significance. However, the building in Survey Area #2 is a utilitarian cold storage warehouse and does not possess exceptional significance to qualify it under Criteria Consideration G. For these reasons, the building in Survey Area #2 is found not to be historically or architecturally significant under any of the criteria of the National Register, California Register or the Los Angeles Cultural Heritage Ordinance. Therefore, the existing cold storage warehouse building in Survey Area #2, 2143 E. 7th Street (APN: 5164-017-008) does not meet the age or significance requirements for designation and is found ineligible as a historical resource under CEQA.

(c) Survey Area #3, #4, and #5

Within the Project Site, a complex of 10 connected existing buildings constructed between 1908 and 1985 with later alterations and additions are located in Survey Areas #3, #4, and #5 (APN 5164-017-003, 5164-017-002, 5164-017-006), which now appear as one large cold storage warehouse. A Sanborn insurance map from 1888 depicts the original cold storage and ice manufacturing facilities at 674 S. Mesquit Street. After it was destroyed by fire, a new facility of 10 connected buildings was developed, beginning in 1908 with the construction of a new building in Survey Area #3 (APN 5164-017-003) at 674 to 678 S. Mesquit Street to replace the original 1888 facility at 674 S. Mesquit Street.

The new storage building erected for the Los Angeles Ice and Cold Storage Company was designed by Hunt, Eager & Burns and built for a cost of \$15,000; the 80-foot by 96-foot building was four-stories tall and had a concrete foundation, blue brick front, brick cornices, iron stairways, wood columns, and a composition roof. Later updates of the Sanborn map show the development of a much larger facility extending into Survey Areas #4 and #5, the construction and expansion of which is documented in multiple building permits that are characterized by incremental additions and structural upgrades over the years. In 1933, a series of changes to the building's walls were undertaken to repair damage from the Long Beach Earthquake. In 1990, to comply with earthquake safety regulations (Division 88), the existing building complex underwent substantial modifications. The Division 88 compliant alterations included replacing unreinforced masonry with modern textured, concrete blocks. In its present condition, the exterior of the building complex is completely unrecognizable due to over \$700,000 worth of Division 88 modifications.

LADBS Permits for Survey Area #4 (APN: 5164-017-002) also begin in April of 1908. The earliest permit on file was for lifting the roof of an existing building by 10 feet, similar to work completed at the same time in Survey Area #3 to repair fire damage. In 1912, the building was further modified, raising the second floor 4 feet and 4 inches to make room for the addition of a new floor between the first and second levels. In 1932, the building's structure and floor were strengthened to support greater loads. In the 1970s, a series of permits were filed to repair additional fire damage. The greatest alterations to structures in Survey Area #4 occurred between 1989 and 1994 when the building underwent structural upgrades in compliance with Division 88. The alterations replaced the original unreinforced masonry exterior with new textured concrete block. Like the buildings in Survey Area #3, these alterations completely rendered the existing buildings unrecognizable. Furthermore, the buildings in Survey Area #4 cannot be differentiated from the buildings in Survey Area #3 due to the new concrete block exterior walls and Division 88 modifications.

Improvements in Survey Area #5 (APN: 5164-017-006) began as early as 1909 with the construction of a single-family residence owned by the Atchison, Topeka, and Santa Fe (AT&SF) Railroad. However, the residence had been demolished by 1922 when a concentrated fruit juice factory was built by the Hyland Stanford Company on the site. The Hyland Stanford Company made significant contributions to the fruit processing industry through multiple patents registered in the company's name. Throughout the 20th century, the facilities were modified by subsequent owners including South Coast Packing Co., and Rancho Cold Storage. The buildings in Survey Area #5 were ultimately destroyed by fire and demolished to make room for a new 14,500-square-foot concrete block cold storage facility that was constructed in 1985.

The existing cold storage building complex in Survey Areas #3 and #4 (APN 5164-017-003 and 5164-017-002) associated with the Los Angeles Ice and Cold Storage Company was evaluated under the Industrial Development Context (1850-1980) for its potential eligibility under Criteria A/1/1 in association with the Theme, Agricultural Roots (1850-

1945) and its associated Sub-Theme, From Farm to Market (1900-1960), and under Criteria C/3/3 as an example of an associated Property Type, Cold Storage Warehouse (1900-1945). The existing building complex in Survey Areas #3 and #4 (APN 5164-017-003 and 5164-017-002) has been substantially altered after its period of significance as a result of comprehensive Division 88 improvements and does not have sufficient integrity to meet the criteria of eligibility for listing as an example of a cold storage warehouse property type associated with the Los Angeles Ice and Cold Storage Company.

The former fruit juice factory in Survey Area #5 (APN: 5164-017-006) associated with the Hyland Stanford Company was evaluated under the Industrial Development Context (1850-1980) for potential eligibility under Criteria A/1/1 for its association with patterns of history under the Sub-Context Manufacturing for the Masses (1887-1965). The former fruit juice factory associated with the Hyland Stanford Company was found ineligible as a historical resource under CEQA because the factory was destroyed by fire and rebuilt as a cold storage facility in 1985 and no longer conveys any significant associations with the former factory use. Therefore, due to its lack integrity to convey any significant associations under the Industrial Development Context, the entire building complex in Survey Areas #3, #4, and #5 (APN 5164-017-003, 5164-017-002, 5164-017-006) was found ineligible as a historical resource under CEQA.

(d) *Survey Area #6 and #7*

Survey Areas #6 and #7 (APNs 5164-016-009 and 5164-016-010) are small (3,708 square feet and 2,881 square feet, respectively) vacant portions of land adjacent to Survey Area #8. According to aerial photographs and Sanborn maps, buildings were built here between 1923 and 1928. These buildings serviced the AT&SF *Railroad*, and had a track running between the two buildings servicing parts of Mesquit and Jesse Streets. However, Survey Areas #6 and #7 are currently undeveloped and have remained so since the railroad buildings were demolished between 1964 and 1977. There are no historic buildings or structures on this lot that qualify as a historical resource under CEQA.

(e) *Survey Area #8*

Survey Area #8 (APN: 5164-016-803) is an unimproved vacant lot currently used as a railroad storage yard. There are no historic buildings or structures on this lot that qualify as a historical resource under CEQA.

(4) **Significance Evaluation of Off-Site Resources**

(a) *7th Street Bridge*

One structure adjacent to the Project Site on the south, the 7th Street Bridge, has been determined eligible for the National Register, is listed in the California Register, is a designated HCM, and currently appears to retain its eligibility as a historical resource; therefore, the 7th Street Bridge is considered a historical resource under CEQA. The 7th Street Bridge's character-defining features from its original 1908-1910 construction are as follows: the bridge abutments anchoring the bridge; its three large close-spandrel concrete

arches above the river that are divided by large rectangular decorative columns; and the decorative concrete panel railing (recessed panel). Features from the 1918 redesign that extended the 7th Street Bridge over the tracks with additional bents and decking were subsequently altered by the 1927 retrofit, and the resulting existing bridge is primarily representative of its 1927 appearance. Character-defining features of the 7th Street Bridge, as it appeared in 1927, are as follows: the significant double-decked structure spanning the railroad right-of-way and the Los Angeles River; its horizontal massing interrupted by vertical elements formed by the large concrete piers and columns; the bents, shear walls and girder spans of the longer viaduct; the upper second deck with its decorative railings, light fixtures, and 7th Street Viaduct Plaque; and the support bents, abutments and shear walls that support the bridge and its approaches over the railroad tracks. Non-contributing features include the sidewalks, curbs, and street surface, which have all been replaced or reconfigured over time. Additionally, the metal picket guard fence with razor wire and concrete stairs do not appear original and are not character-defining.

(b) *Railway Properties*

The adjacent Railway Properties are located adjacent to the east side of the Project Site and includes the BNSF Railroad (P-19-186804). The purpose of the historical resources survey was to verify that the resource was unchanged from the previous survey and evaluation (19-186804) by Smith and Harper (2007). The existing railways are bordered on the east by the channelized Los Angeles River and the Project Site/Mesquit Street on the west. The area visually surveyed is 1,426 linear feet in length and ranges from 153 feet in width near the 6th Street Bridge to 200 feet at its widest point. From the northern portion of the Project Site near the location of the future Ribbon of Light Bridge at 6th Street, there are seven tracks, which expand to eleven tracks on the south near the 7th Street Bridge. There are two additional spurs that stop 419 feet south of 6th Street. These two spurs are fenced off with chain link fence surrounded by a concrete foundation. All of the rails are extruded steel, which consists of the base, web, and ball. The standard gauge tracks (4 feet and 8.5 inches) consist of the rail atop wood ties (or sleepers), which sit on a relatively flat gravel or paved surface. There are small berms along the outer perimeter of the track. The ballast bed (trackbed) is relatively flat with small berms on each track line. The two tracks closest to the Los Angeles River are utilized by Metro for passenger travel. The four tracks west of the first two tracks are presently utilized by BNSF for freight travel, and the remaining tracks are utilized by Amtrak and Metro for passenger travel. The four tracks currently utilized by BNSF have recently been updated with new wood ties (or sleepers), steel rails, steel spikes, and gravel Ballast beds.

The historical resources survey confirmed that this railway segment adjacent to the Project Site is substantially changed and has undergone extensive upgrades that have materially impaired the resource and that it does not retain integrity to contribute to the BSNF Railroad as a whole. The gravel bed and railroad tracks appear to be entirely replaced with new material and no evidence of historic period features or materials appears to be present. Because this resource railroad segment does not retain integrity, it does not qualify as a contributing character-defining feature of the BSNF Railroad and

it does not have enough integrity to contribute to the eligibility of the BNSF Railroad system as a whole. Because the railway alignment adjacent to the Project Site is a non-contributing segment of the historical resource, no further analysis is required.

(c) *2101 E. 7th Street – Bailey Schmitz Co. Building*

One building adjacent to the Project Site on the west, 2101 E. 7th Street, is a three-story brick utilitarian industrial building constructed in 1910 for the Bailey Schmitz Co., a mattress batting manufacturer who owned the building until 1983. The building has been seismically upgraded and substantially renovated for adaptive reused as a multi-family live-work residence. Assessor records indicate that the unreinforced masonry Bailey Schmitz Co. building was constructed in 1910. According to Davison's 1919 Mattress Directory, the Bailey Schmitz Co., Inc., was a manufacturer of mattress batting and felt in Los Angeles at 7th Street and Santa Fe Avenue (Davidson, 1918). Sanborn maps from 1950, 1951 and 1955 show the building continued to be occupied by Bailey Schmitz Co., Inc., mattress manufacturer, through the 1950s. Review of City building permits indicate the building was substantially altered over the years with numerous permits for additions, alterations and repairs on file. The Bailey Schmitz Co. continued to own the building until 1983. The Bailey Schmitz Co. building appears to have been seismically upgraded and renovated for its current multi-family live-work residential use. The fenestration has been replaced with new windows and doors; a new fire escape has been added to the rear east elevation; the brickwork along the ground-floor level on the south and west facades has been painted; and warehouse door openings have been closed (bricked over) on the south facade. Remnants of a painted sign on the building's cornice are cut off at the top due to a "parapet correction" in 1966 according to building permits (LADBS, 1966). The painted sign appears to read "Bailey Schmitz Co. Inc." Remnants of another painted sign on the south façade between the second and third stories indicates the building was once a wholesale warehouse.

The Bailey Schmitz Co. building was not identified as an individually eligible resource or as a contributor to a potentially eligible historic district by SurveyLA. Furthermore, the records search results did not identify any previous evaluations of the building. It is not located within a known historic district. The building was evaluated under the Industrial Development Context (1850-1980) for potential eligibility under Criteria A/1/1 and C/3/3 for its association with the Sub-Context Manufacturing for the Masses (1887-1965) as applied to the Factory Property Type (1887-1980). The building does not appear to be historically significant under Criteria A/1/1 for its association with early 20th century manufacturing in Los Angeles, nor does it appear eligible under Criteria C/3/3/ as an example of a factory property type. Substantial alterations to convert the building from manufacturing to residential use have materially impaired its historic significance and architectural integrity, and therefore it is not considered a historical resource under CEQA.

4. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the 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 Section 15064.5;

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

Threshold (c): Disturb any human remains including those interred outside of formal cemeteries.

For this analysis, the Appendix G Thresholds 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 factors to evaluate cultural resources impacts are listed below:

(1) Historical Resources

- A project would normally have a significant impact on a significant resource if it would result in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5 if the project involves:
 - 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 (Standards).
 - Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

(2) Archaeological Resources

- A project would normally have a significant impact upon archaeological resources if could 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.
- Is at least 100 years old and possesses substantial stratigraphic integrity.
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

b) Methodology

A project with an effect 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. In general, 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” (CEQA Guidelines Section 15064.5(b)(1)). In addition, while assessing the project’s impacts under CEQA, it is important to consider the ability of the historical resources to retain their integrity. A project that diminishes the integrity of a resource such that the significance of a historical resource is materially impaired is a project that would result in a significant impact on the environment. This analysis of impacts to historical resources is based on the detailed technical information provided in the Cultural Resources Assessment Report, provided in Appendix D of this Draft EIR.

(1) Historic Architectural Resources

The analysis in this section of the Draft EIR is summarized from the Cultural Resources Assessment Report prepared by qualified ESA Cultural Resources Group personnel who meet and exceed the Secretary of the Interior’s Professional Qualification Standards in history and architectural history. The key steps taken in completing the Cultural Resources Assessment Report, which serves as the basis for this section of the Draft EIR, includes a review of the existing properties within the Project Site and within a 0.25-mile radius of the Project Site in order to address indirect impacts. All buildings and structures on the Project Site greater than 45 years in age were evaluated for their eligibility as potential historical resources pursuant to CEQA. Research of the Project Site’s development included a review of historic building permits for improvements to the property, Sanborn Fire Insurance Maps, historic photographs, aerial photos, and local histories. The California State Historic Resources Inventory for Los Angeles County, Department of Parks and Recreation Historic Resources Inventory Forms, and SurveyLA Eligibility findings were consulted to identify any previous evaluations of Project Site and potential historic resources within a one-quarter-mile radius of the property.

(2) Archaeological Resources

The analysis in this section of the Draft EIR is summarized from the Cultural Resources Assessment Report prepared by qualified ESA Cultural Resources Group personnel who meet and exceed the Secretary of the Interior’s Professional Qualification Standards in

archaeology. This section focuses on archaeological resources, which are defined by the California Office of Historic Preservation as “A site is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archaeological value regardless of the value of any existing structure” and can include battlefields, campsites, cemeteries, ceremonial sites, habitation sites, rock carvings, rock shelters, ruins of a building or structure, shipwrecks, trails, and village sites.⁶⁸ The analysis of archaeological resources is based on (1) a cultural resource records search conducted at the SCCIC at California State University, Fullerton to review recorded archaeological resources within a 0.5-mile radius of Project Site, as well as a review of cultural resource reports and historic topographic maps on file; (2) a review of the California Points of Historical Interest (CPHI), the California Historical Landmarks (CHL), the California Register, the National Register, and the California State Historic Resources Inventory (HRI) listings; (3) review of historic aerial imagery; (4) other technical studies (e.g., the Phase I Environmental Site Assessment Report, provided in Appendix G-1 of this Draft EIR, and the Preliminary Geotechnical Report, provided in Appendix F-1 of this Draft EIR) to understand the land use history of the Project Site, and (5) a pedestrian survey of the Project Site.

The potential for the Project Site to contain buried archaeological resources was 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, survey, and the proposed excavation parameters for the Project, which were compiled into the geoarchaeological review a summary of which was presented above.

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 resource as defined in Section 15064.5?

(1) Impact Analysis

(a) Direct Impacts

(i) Historical Resources on the Project Site

As stated under Subsection 3, *Archival Research*, none of the buildings on the Project Site were identified as significant historical resources in SurveyLA’s findings for the Community Plan area. In order to evaluate the buildings on the Project Site, applicable

⁶⁸ City of Los Angeles Office of Historic Preservation (OHP), *Instructions for Recording Historical Resources*, 1994.

Context/Theme/Property Type eligibility standards formulated for SurveyLA were identified. The buildings were then evaluated for eligibility for listing on the National Register, California Register, and local register, and none were found to be eligible. Accordingly, the buildings on the Project Site do not qualify as historical resources under CEQA Guidelines Section 15064.5(a)(1) or (2) and do not warrant consideration under CEQA Guidelines Section 15064.5(a)(3). **Accordingly, the Project would not directly cause a substantial adverse change in the significance of an historical resource on the Project Site, as defined in Section 15064.5.**

(ii) *Historical Resources Adjacent to the Project Site*

The Project Site is bordered on the east by the Railway Properties, with the Los Angeles River to the east, although, under the Project with the Deck Concept, the Railway Properties are part of the Project Site. Although the BNSF Railroad line in its entirety is likely eligible for the National Register and California Register, the segment encompassed by the Railway Properties, adjacent to the Project Site, does not retain sufficient integrity to contribute to the eligibility of the BNSF Railroad as a whole, and is considered a non-contributing element of the BNSF Railroad line. As discussed in the Subsection 2.b)(5)(a), *7th Street Bridge*, the 7th Street Bridge is considered a historical resource pursuant to CEQA. The Project proposes to create new vehicular and pedestrian circulation connections to the existing 7th Street Bridge, which would alter certain parts of the bridge. The Project would include the construction of two new vehicular ramps that would provide access to the 7th Street Bridge from Buildings 4 and 5. The structural supports for the two ramps would be separate from the bridge structure and would be connected to the 7th Street Bridge by a cover plate that spans a seismic joint. The seismic joint would accommodate differential movements in longitudinal and transverse directions during thermal expansion and seismic events. Additional vehicular loads would be applied only to the new buildings so that the 7th Street Bridge's structural strength would remain intact. The Project also would include new pedestrian access from the 7th Street Bridge leading to an open courtyard space between Buildings 4 and 5. Detailed plans depicting the Project's proposed alterations and connections to the 7th Street Bridge are included in the Cultural Assessment Report, Appendix G, Bridge Connection Plans.

One of the two vehicular ramps with pedestrian access would be located at the southwestern corner of Building 5, to the north of the 7th Street Bridge. To provide for vehicular and pedestrian access to the Project, proposed alterations are necessary that would affect character-defining features of the 7th Street Bridge. One historic light post would be removed and relocated or stored to make way for the ramp for Building 5. The 7th Street Viaduct Plaque would be temporarily removed and relocated on the bridge. To allow for the southwest exit ramp for Building 5, approximately 78 feet of railing would be removed on the north side of the 7th Street Bridge. As previously described, this railing is not original and was replaced in-kind and in conformance with the Standards in the 1990s as part of the seismic retrofit of the 7th Street Bridge. However, because the railing is a replacement-in-kind that restored the handrails to their 1927 appearance, the railing

is considered a character-defining feature of the historic bridge, even though it is not original.

Other proposed changes associated with the connections to the 7th Street Bridge at the southwest corner of Building 5 would involve removal of non-original, non-character-defining elements and construction of new elements that would be compatible in design and materials and would not adversely impact the integrity of the bridge. Non-original non-character-defining sidewalk would be removed to allow for the southwest exit ramp for Building 5, and new compatible curb ramps and bollards would be added. The existing non-original north maintenance stairs would be removed and rebuilt approximately 60 feet east. The new concrete staircase would be utilitarian in design, and the concrete of the staircase would match the color and texture of the bridge. The new concrete staircase would not be visible to southward views of the bridge and would be minimally visible to northward views of the 7th Street Bridge. A sidewalk would be added to replace the area where the non-original stairs used to be. A non-original metal picket guard fence with razor wire would be removed and replaced with a similar fence of approximately 120 feet.

The second vehicular ramp would be located at the southeastern corner of Building 4. On the north side of the 7th Street Bridge, the Project would remove the outer ends of character-defining cantilevering concrete transverse beams and approximately 75 feet of character-defining railing that was previously replaced in-kind in conformance with the Standards, as well as the non-original, non-character-defining sidewalk to allow for the ramp for Building 4. Modifications to three of the character-defining bridge bents would most likely be necessary to allow the new ramp to be attached. New curb ramps and bollards would be added, and a crosswalk would be installed on the 7th Street Bridge just north of the intersection of the ramp for Building 4. On the south side of the 7th Street Bridge, approximately 30 feet of character-defining railing that was previously replaced in-kind in conformance with the Standards as well as non-original, non-character-defining sidewalk would be removed to allow for a new crosswalk.

In addition to the modification to the 7th Street Bridge to facilitate vehicular access to Buildings 4 and 5, the bridge also would be altered to better accommodate pedestrian access to the Project Site. The Project would remove the outer ends of character-defining cantilevering transverse beams at the juncture of the new ramps, and would also remove approximately 39 feet of character-defining railing that was previously replaced in-kind in conformance with Standards to allow for vehicular and pedestrian circulation to access the Project. In addition, the Project would entail the removal of non-original sidewalk on the north side of the 7th Street Bridge at the location of a new stair that provides access to a 30-foot-wide courtyard space located between Buildings 4 and 5.

It is anticipated that four new signal poles would be added and placed in the rail yard at-grade and not directly affixed to the 7th Street Bridge. The new signal poles would meet City standards and would be installed at non-contributing locations on land adjacent to the 7th Street Bridge and would not materially alter character-defining features of the bridge or block views of the bridge. The installation of new signals and poles would also

be reversible in conformance with the Standards; because these elements are reversible, they could be removed in the future. Therefore, the integrity and eligibility of the 7th Street Bridge would not be affected by their installation.

As indicated above, the Project would require some removal of character-defining, in-kind replacement railing. With both the vehicular access and pedestrian improvements, the Project would potentially remove approximately 192 feet or less of the 7th Street Bridge's existing character-defining, in-kind replacement railing along the north side near the Project Site. This includes approximately 78 feet to allow for the southwest exit ramp for Building 5; 75 feet for the entrance/exit ramp for Building 4; and 39 feet to better accommodate pedestrian access. On the south side of the 7th Street Bridge, approximately 30 feet of character-defining railing that was previously replaced in-kind in conformance with Standards and non-original sidewalk would be removed to allow for a new crosswalk. Therefore, a total of approximately 222 feet would be removed. As previously described, there is approximately 1,407 linear feet and 1,222 linear feet of character-defining railing on the south and north side of the 7th Street Bridge, respectively, for a total of 2,697 linear feet of character-defining railing. Therefore, if 222 feet or less of character-defining railing is removed on the north and south sides of the 7th Street Bridge as part of the Project, it would represent up to approximately 8.23 percent of the bridge's character-defining railing overall.

The Project would be restricted to the western portions of the 7th Street Bridge adjacent to the Project Site, where the new buildings would be connected to the bridge with two vehicular ramps. Since the concrete slab and seismic joint for connecting the new ramps to the 7th Street Bridge, along with the structural framing supporting them, would be separate structures, no longitudinal or main transverse beams would be demolished, and the bridge's structural integrity would remain intact. Non-character-defining sidewalks and character-defining, in-kind replacement railings would need to be removed, but the majority of the original significant character-defining structural features of the 7th Street Bridge would remain intact, including the abutments, concrete arches, columns, deck, and panel railings of the 1908-1910 bridge and the double-decker structure, piers, columns, bents, girders, decorative railings, and light fixtures of the 1927 Viaduct. Although alterations to the 7th Street Bridge would occur, these changes would largely be restricted to segments of decorative non-structural elements (character-defining, in-kind replacement railings), relatively few structural elements (a select number of bents for which modification is likely necessary for the installation of the ramp and the outer ends of character-defining cantilevering transverse beams), and non-original additions/alterations (e.g., sidewalks, curbs, maintenance stairs, metal fence).

Alterations to the 7th Street Bridge to support the Project would result in limited overall changes to its character-defining features; however, the Project also would follow the Standards to the extent feasible. The design and construction of the 7th Street Bridge is fully documented in a Historic American Engineering Record (HAER) report, and based upon this documentation, several of the minor changes to the bridge proposed by the Project would be reversible should the Project be removed in the future, including the

relocation of the lamp post and bridge plaque that could be returned to their original locations.

As discussed above, the Project would retain the majority of the 7th Street Bridge's character-defining features; however, modifications to the bridge would still occur with potential for unintended construction impacts to bridge fabric through alteration/removal of up to approximately 8.23 percent of the bridge's railing, relocation of the historic lamp post and plaque, and construction activity associated with removal/replacement of non-character-defining sidewalks/stairs as well as adjacent new construction. These modifications to the 7th Street Bridge that would occur under the Project are considered potentially significant; therefore, mitigation measures are required to ensure that appropriate preservation treatment of affected bridge fabric during construction is undertaken in conformance with Standards and to reduce impacts to less than significant.

To support conformance with Standards during construction and reduce potential impacts to less than significant, mitigation measures are presented below. Implementation of Mitigation Measure CUL-MM-1, *Standards Conformance Plan Review for 7th Street Bridge*, would ensure that a Qualified Preservation Professional shall review the draft and final plans for the Project for conformance with the Standards; CUL-MM-2, *Reproduction of the 7th Street Bridge Railings*, would ensure that by taking molds of the railings and storing them there would be the ability to reconstruct and reinstall the removed portions of the railing at a future point in time, if necessary. CUL-MM-3, *Construction Monitoring for the 7th Street Bridge*, would require that a Qualified Preservation Professional be retained to document existing conditions and provide preservation treatment recommendations including protective measures during construction. Implementation of CUL-MM-4, *Historic Structure Report for the 7th Street Bridge*, would ensure baseline documentation of the historical resource occurs, including documenting in detail—in measured drawings and photographs—character defining elements of the bridge that would be altered by the Project.

After construction of the Project, the 7th Street Bridge would remain intact. However, the integrity and significance of the 7th Street Bridge could be materially impaired by removal of character-defining railing, modification of several of the bents to accommodate the installation of a ramp, removal of the outer ends of the transverse beams, and the removal and relocation of the lamp post and plaque. Moreover, there is potential for structural damage to the 7th Street Bridge due to construction activities. Therefore, impacts on the 7th Street Bridge are potentially significant, and mitigation measures are required to reduce impacts to less than significant.

*(iii) Project with the Deck Concept**(a) Historical Resources on the Project Site
(including the Railway Properties)*

As with the Project, there are no historical resources on the Project Site, including the Railway Properties, which would be part of the Project Site under the Project with the Deck Concept. **Therefore, the Project with the Deck Concept would not directly cause a substantial adverse change in the significance of an historical resource on the Project Site, as defined in Section 15064.5.**

(b) Historical Resources Adjacent to the Project Site

As with the Project, the Project with the Deck Concept would require removal of a total of approximately 222 feet of the 7th Street Bridge's existing character-defining, in-kind replacement railing, as well as other minor alterations to the bridge described above for the Project. Although detailed design plans for the Deck have not been completed, it is anticipated that the Project with the Deck Concept may also require up to approximately 69 linear feet of additional demolition, including non-contributing sidewalk and in-kind replacement railing to the next bent. Therefore, the Project with the Deck Concept could require the removal of up to 291 linear feet of character-defining railing out of the total of 2,697 total linear feet of railing, or approximately 10.79 percent of the 7th Street Bridge's character-defining railing overall.

After construction of the Project with the Deck Concept, the 7th Street Bridge would remain intact. However, as with the Project, the integrity and significance of the 7th Street Bridge under the Project with the Deck Concept could be materially impaired by the minor modifications to it, including the removal of approximately 10.79 percent of its character-defining railing, the modification of several of the bents to accommodate the installation of a ramp, the removal of the outer ends of the transverse beams, and the removal and relocation of the lamp post and plaque. Moreover, there is also the potential for structural damage to the 7th Street Bridge due to construction activities. **Therefore, impacts on the 7th Street Bridge under the Project with the Deck Concept are potentially significant, and similar mitigation measures are required to reduce impacts to less than significant.**

(b) Indirect Impacts

The Project may result in potential indirect impacts to historical resources adjacent to and within a 0.25-mile radius of the Project Site. Potentially adverse indirect impacts may include:

- changes to important primary views that characterize a historical resource and its relationship with its historic setting and related resources;
- alteration of the setting of off-site historical resources due to incompatible architecture or other prominent Project improvements;

- excavation or construction vibration that could damage the physical structure or materials of adjacent historic buildings.

(i) *Historical Resources Adjacent to the Project Site*

With the recent removal of the 6th Street Bridge and its future replacement with a new bridge, the immediate setting north of the 7th Street Bridge has been significantly altered and the previous visual and spatial relationships between the two historic bridges have been substantially changed. South of the 7th Street Bridge, the historic setting of the bridge has been altered by the I-10 and CA-60 freeway crossings over the Los Angeles River. Thus, the historic setting, spatial relationships, and primary views between the 7th Street Bridge and the 6th Street Bridge to the north have been lost. However, due to its location, scale and massing, the 7th Street Bridge is presently visually prominent within its immediate setting and views of the bridge along the Los Angeles River corridor are currently open and important.

The Project would introduce new construction adjacent to the 7th Street Bridge that would be greater in density and taller in scale than the existing improvements. However, it would not obscure the existing primary views of the 7th Street Bridge along the Los Angeles River corridor from the north and south, where the bridge spans the Los Angeles River. Because of the open views along the Los Angeles River, the 7th Street Bridge would remain visually prominent within the surrounding setting. The character-defining concrete arches that span the Los Angeles River and the double-decked structure above, including the decorative columns, railings, and historic lighting fixtures of the bridge would remain visible, and the views of the 7th Street Bridge along the Los Angeles River corridor from north and south would be retained. These views from the Los Angeles River Corridor are considered the primary views of the 7th Street Bridge, as they are the only views in which the bridge can be observed comprehensively as an entity comprised of multiple structural elements that help it to convey its significance as a work of engineering. By contrast, the secondary views of the 7th Street Bridge are those views in which only some components of the bridge are readily visible, such as the view of the bridge as both motorists and pedestrians are traversing the 7th Street corridor from the east and west. From this vantage point, the deck, the decorative railings and the lamp posts are the most visible features of the 7th Street Bridge; however, views of these features are not prominent and alone, do not meaningfully convey the bridge's significance as a work of engineering. The views of the 7th Street Bridge from the east and the west would remain largely unobstructed after implementation of the Project. Other views of the 7th Street Bridge in the area are incidental in nature, and are considered neither primary or secondary views. The Project would potentially alter the 7th Street Bridge's existing setting with new construction adjacent to the bridge; however, the Project would not result in a substantial adverse change to the bridge's immediate surroundings such that the significance of the bridge would be materially impaired.

The existing structures on the Project Site were constructed outside the period of significance for the 7th Street Bridge (1910-1927). Accordingly, they are not part of the historic setting of the 7th Street Bridge and do not contribute to its eligibility. As such,

demolition of the existing structures on the Project Site would not indirectly impact the eligibility of the 7th Street Bridge. The existing setting of the 7th Street Bridge consists of dense infill development on the banks of the Los Angeles River. Except for the Los Angeles River itself, the existing setting does not contribute to the significance of the 7th Street Bridge as an historical resource. Located on the Project Site, directly adjacent to the 7th Street Bridge, are two warehouses constructed outside of the bridge's period of significance (1910-1927). At 689 Mesquit Street (APN: 5164-018-009), the former West Coast Quilting Company factory was built in 1961. At 690-694 Mesquit Street is a new cold storage warehouse built in 2002. Furthermore, there is a large contemporary warehouse located at 2160 E. 7th Street, on the east side of the 7th Street Bridge, constructed in 1986. The removal of these ineligible buildings from the Project Site would not impact the 7th Street Bridge's setting or alter its eligibility. As discussed above under Archival Record Search for the BNSF Railroad, AT&SF Railroad (19-186804), the Railway Properties lacks integrity due to substantial alterations, and only the location of the railroad right-of-way can be considered to contribute to the historic setting of the 7th Street Bridge.

The historic setting of the 7th Street Bridge as it spans the Los Angeles River and its visual and spatial relationships with other historic bridges along the Los Angeles River corridor comprise the historic setting of the bridge during its period of significance. However, as previously stated, the setting of the 7th Street Bridge has been substantially compromised by the removal of the 6th Street Bridge and the construction of the I-10 and SR-60 crossings. As a result, the 7th Street Bridge is now an isolated resource. Furthermore, the Project Site and immediate surrounding setting is substantially altered and does not contribute to the eligibility of the bridge. Therefore, the introduction of new construction on the Project Site would not materially alter the immediate surrounding setting of the 7th Street Bridge or alter its eligibility as an historical resource under CEQA. Thus, the Project would have a less-than-significant indirect impact on the 7th Street Bridge because its integrity of setting has already been substantially compromised. Furthermore, the 7th Street Bridge would remain visually prominent within the Los Angeles River view corridor after Project completion, and the majority of its important character-defining features would be preserved. Although the Project would not fully conform to Standard 9 due to its substantial scale and massing, the Project has been designed to protect the integrity of the bridge. If the new construction would be removed in the future, the essential form and integrity of the 7th Street Bridge would be unimpaired; as such, the bridge would remain an eligible historical resource, and the Project would conform to Standard 10.

Although indirect impacts on the 7th Street Bridge associated with the Project once constructed are considered less than significant, there is potential during construction of the Project for vibration to cause damage to the 7th Street Bridge due to the bridge's close proximity to the construction activity. As is common in similar urban development sites, vibration and settlement would be controlled through adherence to design values prescribed by the shoring engineer and geotechnical engineer with the intent to prevent damage to adjacent structures and through monitoring of associated construction

activities. Although steps would be taken during construction to help ensure design values are not exceeded, if exceedance were to occur and result in structural damage, such damage would likely be surficial and repairable based on industry practice and knowledge of construction activities in similar settings. Nonetheless, the potential for damage to the bridge due to construction-related vibration is considered a potentially significant impact, however, as further discussed in EIR in Section IV.I, *Noise*, and in the *Mitigation Measures* and *Level of Significance after Mitigation* subsections below, this impact would be reduced to a less-than-significant level through Mitigation Measures NOISE-MM-6, NOISE-MM-7, and NOISE-MM-8.

Therefore, pursuant to CEQA, although the Project, once constructed, would not materially impair the eligibility of the 7th Street Bridge as a historical resource, the potential for structural damage to the 7th Street Bridge during construction is considered a potentially significant indirect impact and mitigation measures are required to reduce impacts to less than significant.

(ii) Historical Resources in the Project Vicinity

Indirect impacts to resources within a quarter-mile radius of the Project Site were analyzed to determine if the Project would result in substantial adverse changes to their integrity or their immediate surroundings that would detract from their significance as historical resources. Four eligible or designated known historical resources and a historic district were identified within the Project vicinity, as follows: Engine Co. #17 at 708 S. Santa Fe Avenue (3S); the H. J. Heinz Co. Warehouse at 712 S. Santa Fe Avenue (3S); the Ford Motor Company Factory at 777 Santa Fe Avenue and 2046 E. 7th Street, which was recently determined eligible for the National Register; the National Biscuit Company Building at 1820 E. Industrial Street (5S1, HCM 888); and the Downtown Los Angeles Industrial Historic District. However, all of these historical resources are approximately one to two blocks southwest or two to three blocks northwest of the Project Site, therefore, primary views to and from these resources would not be obstructed or altered by the Project such that the existing visual prominence and character of the historical resources within the built environment would be visually impaired. Furthermore, the setting of the area has evolved over time with infill development. Due to the density of the surrounding urban environment, intervening development and substantial alterations of the setting, none of the identified resources would be adversely impacted by the Project. The Project would not alter the setting or immediate surroundings that may contribute to the eligibility of any of the identified resources within the Project vicinity and would not reduce the visual prominence or physical integrity that contributes to the eligibility of any of these historical resources. For these reasons, the Project would not indirectly cause a substantial adverse change in the significance of historical resources in Project vicinity as defined in Section 15064.5. **Therefore, indirect impacts on historical resources in the Project Vicinity would be less than significant.**

(iii) *Project with the Deck Concept*

(a) Historical Resources Adjacent to the Project Site

As shown in Figure II-7 of Chapter II, *Project Description*, of the Draft EIR, Project with the Deck Concept would partially obstruct views to the south of the western end of the 7th Street Bridge from the Los Angeles River corridor, including the western approach, western abutments, and the western-most piers of the bridge that span the railroad right-of-way. However, there would be no additional obstruction of views of the character-defining bridge railings, deck, and lighting fixtures in regard to views from the north. The majority of the northern elevation of the 7th Street Bridge, including the more prominent features that span the river corridor and continue across to the eastern end of the bridge, would still be visible after construction of the Project. The views of the 7th Street Bridge from the south would be more affected under the Project with the Deck Concept than they would be under the Project due to the construction of the Deck Concept. However, with implementation of the Project with the Deck Concept, the 7th Street Bridge would still be prominently visible within the urban setting and able to convey its significance as a work of architecture and engineering, as well as a transportation corridor.

However, as stated above for the Project, under the Project with the Deck Concept there would also be potential during construction for vibration to cause damage to the 7th Street Bridge due to the bridge's close proximity to the construction activity. Therefore, due to potential structural damage associated with construction-related vibration, indirect impacts to the 7th Street Bridge during construction are considered a potentially significant impact. However, similar to the Project, the Project with the Deck Concept would be required to implement Mitigation Measures NOISE-MM-6 through NOISE-MM-8 to reduce impacts to a less-than-significant level. **Therefore, pursuant to CEQA, although the Project with the Deck Concept, once constructed, would not materially impair the eligibility of the 7th Street Bridge as a historical resource, the potential for structural damage to the bridge during construction is considered a potentially significant impact and mitigation measures are required.**

(b) Historical Resources in the Project Vicinity

Similar to the Project, due to the density of the surrounding urban environment, intervening development and substantial alterations of the setting, the Project with the Deck Concept would not alter the setting or immediate surroundings to the extent that it would impair eligibility of the identified historical resources and historic district within a quarter-mile radius of the Project Site. As with the Project, the identified historical resources and historic district are all approximately one to two blocks southwest or two to three blocks northwest of the Project Site, therefore, primary views to and from these resources would not be obstructed or altered by the Project such that the existing visual prominence and character of the historical resources within the built environment would be visually impaired. In addition, the setting of the area has evolved over time with infill development. Due to the density of the surrounding urban environment, intervening

development, and substantial alterations of the setting, none of the identified resources would be adversely impacted by the Project. For these reasons, the Project with the Deck Concept would not indirectly cause a substantial adverse change in the significance of an historical resource in the vicinity as defined in Section 15064.5. **Indirect impacts on historical architectural resources in the vicinity of the Project with the Deck Concept would be less than significant.**

(2) Mitigation Measures

The following mitigation measures would reduce potential impacts on historical resources associated with the Project and the Project with the Deck Concept. It should be noted that in addition to these measures, Mitigation Measures NOISE-MM-7 through NOISE-MM-11, provided in Section IV.I, *Noise*, of this EIR, also address structural vibration effects during construction, including potential impacts on historical resources.

CUL-MM-1: Standards Conformance Plan Review for 7th Street Bridge. The Project proposes new vehicular/pedestrian ramps that would connect to the 7th Street Bridge and would result in removal of character-defining features and materials. To reduce potential impacts, the Applicant shall retain a qualified preservation consultant, meeting the Secretary of the Interior's Professional Qualifications Standards for History, Architectural History, or Architecture, pursuant to 36 CFR 61 and who has at least 10 years of experience in design review and collaboration applying the Standards (Qualified Preservation Professional) to review the draft and final plans for the Project, to ensure conformance with the Secretary of the Interior's Standards for Rehabilitation (Standards).

- Where the Project could impact the physical materials of the 7th Street Bridge, the Qualified Preservation Professional shall provide recommendations for appropriate protective measures and preservation treatment (repair or in-kind replacement) of the affected historic bridge fabric to be retained, to ensure that historic features, materials and finishes are protected, and that the 7th Street Viaduct Plaque and the light post shall be protected during removal, storage, and relocation.
- The Qualified Preservation Professional shall prepare a Plan Review Report, documenting conformance with the Standards, which shall be submitted as a draft to the City's Department of City Planning Office of Historic Resources, within 30 days of completion of the final design plans, and shall make any recommendations necessary to bring the Project design for the alterations and additions to the 7th Street Bridge into conformance with the Standards.
- Once the Project plans have been revised and are ready to be finalized, the Qualified Preservation Professional shall review the 90 percent construction plans and prepare a final report documenting conformance with the Standards, which shall be submitted to the City's Department of City Planning Office of Historic Resources, for final approval.

CUL-MM-2: Reproduction of the 7th Street Bridge Railings. The 7th Street Bridge's existing concrete railings are not original but are reproductions of the originals. Prior to their removal, the Applicant shall prepare molds for the 7th Street Bridge's concrete railings. The molds shall be securely stored on-site, ensuring that the railings could be reinstalled in the future if necessary and that the 7th Street Bridge can be returned to its current condition.

CUL-MM-3: Construction Monitoring for the 7th Street Bridge. Prior to any demolition or construction activities that would affect the historic fabric of the 7th Street Bridge, including removal of steps, fencing, or other existing materials attached to or part of the bridge, removal of the bridge's concrete railings or light post, or alteration of structural features such as bents, a Qualified Preservation Professional shall be retained to document existing conditions and provide preservation treatment recommendations including protective measures and treatment recommendations.

- Prior to commencement of construction activities, the Qualified Preservation Professional shall document existing conditions at Project locations where alterations are to be made and meet with and provide preservation guidelines and instructions to the construction manager and team.
- During construction, the Qualified Preservation Professional shall monitor and document the Project, including demolition monitoring, preservation treatment oversight, and construction monitoring for Project components that would affect the character-defining features of the bridge such as any structural alterations of the 7th Street Bridge, removal/construction of pedestrian stairs, construction of vehicular ramps/intersections, removal of railings, relocation of the 7th Street Viaduct Plaque and light post and fixture, installation of new street signals, and if included, construction of the Deck. The Qualified Preservation Professional shall provide oversight and monitoring for the preparation of molds of the 7th Street Bridge's existing concrete railings (see CUL-MM-2) and shall also provide preservation oversight and monitoring for the removal and relocation of the 7th Street Viaduct Plaque and the historic light post on the bridge's railings that would be removed and relocated. The Qualified Preservation Professional shall document the existing conditions of the railing, 7th Street Viaduct Plaque and light post prior to their removal; monitor the railing mold-making process and appropriate storage of the molds for potential future use; monitor the process of removal of the 7th Street Viaduct Plaque and light post; review and document procedures for temporary storage of the 7th Street Viaduct Plaque and light post; monitor the 7th Street Viaduct Plaque and light post relocation and reinstallation process; and provide preservation treatment recommendations for repair of the 7th Street Viaduct Plaque and light post in conformance with the Standards. Monitoring intervals are to be determined based upon construction schedule and timing of Project activities that will affect the 7th Street Bridge. The monitoring visits shall be documented in a monitoring report for each visit. Once the majority of the

construction activities affecting the 7th Street Bridge are completed, the Qualified Preservation Professional shall document the Project's conformance with the Standards in a Substantial Completion Report that shall be submitted to the City's Department of City Planning Office of Historic Resources for review and approval.

CUL-MM-4: Historic Structure Report for the 7th Street Bridge. The 7th Street Bridge was previously documented in a Historic American Engineering Record report that summarized the history of the bridge and included copies of the historic bridge plans. The existing bridge exhibits several alterations from its original design, and under the Project will undergo additional alterations. To provide a baseline for the current Project and protect the integrity of the bridge under the current and future projects, a Historic Structures Report (HSR) shall be prepared by a Qualified Preservation Professional in accordance with guidelines set forth by the National Park Service in Preservation Brief No. 43: "The Preparation and Use of Historic Structure Reports" by Deborah Slaton (Slaton, 2005: 1). The HSR shall provide a summary of the bridge's history and existing condition through available historic plans, current plans, and physical information. The HSR shall act as a guidance document for the current project and any future projects on the 7th Street Bridge. The HSR shall include guidelines for the most appropriate approach to treatment for any currently proposed work, including, but not limited to, protective measures, rehabilitation, repair, in-kind replacement, preservation treatment of materials/features, and maintenance. The HSR shall follow the three-part format and organization as outlined in Preservation Brief No. 43, including the following: Part 1 – the bridge's history, chronology, physical description, significance, and existing condition assessment; Part 2 – Treatment and Work Recommendations for the Project; and Part 3 – Supplemental Record of Work Performed including planning or technical studies or other investigations, records of physical work, construction documents, annotated drawings, construction monitoring logs, photographs, the Project plans showing the proposed alterations to the 7th Street Bridge, the Substantial Completion Report, and any other pertinent technical data or documentation. This report shall be reviewed by the City's Office of Historic Resources and Bureau of Engineering, to ensure that that the HSR meets the City's requirements. Once the Project is completed, the Applicant shall file the HSR with the City's Department of City Planning Office of Historic Resources and Bureau of Engineering, and the South Central Coastal Information Center (SCCIC).

(3) Level of Significance after Mitigation

The Project and the Project with the Deck Concept would result in a variety of minor alterations to the 7th Street Bridge fabric including removal, relocation or alteration of character-defining features, such as the removal of sections of the character-defining railing, the removal of the outer ends of character-defining cantilevering concrete transverse beams, modifications to three of the character-defining bridge bents, and the relocation of a light post and a plaque. Due to the removal of historic materials and the alteration of character-defining features—including the alteration of original features and

later additions that have acquired historic significance—and the alteration of distinctive features, finishes and construction techniques that characterize the property, the Project and the Project with the Deck Concept would not fully conform with Standards 2, 4, and 5, respectively. However, the degree of alteration to the bridge is not such that it would lose its eligibility as a resource at the federal, state or local levels, or its ability to convey its significance; therefore, the minor alterations to the bridge do not constitute material impairment. With mitigation incorporated to enforce conformance with the Standards during construction, as specified in Mitigation Measures CUL-MM-1, CUL-MM-2, CUL-MM-3, and CUL-MM-4, the existing National Register eligibility of the 7th Street Bridge, its listing in the California Register, and its designation as a HCM would be retained since the bridge would still remain largely intact and would continue to convey its significance as an example of early twentieth century engineering. Therefore, with mitigation, the Project and the Project with the Deck Concept would result in less-than-significant direct impacts to the 7th Street Bridge.

However, for both the Project and the Project with the Deck Concept, there would be potential for temporary construction vibration and settlement effects on the 7th Street Bridge from onsite construction activities. The 7th Street Bridge is a reinforced concrete, closed-spandrel, arch bridge constructed in 1910 that has undergone multiple improvements/retrofits, including retrofitting to accommodate heavier automobile traffic in 1927 and seismic retrofitting in 1990. Therefore, as discussed in Section IV.I, *Noise*, the 7th Street Bridge is considered a Category I structure and the significance threshold of 0.5 in/sec PPV for potential structural damage to a reinforced-concrete structure (the bridge) has been applied in the noise analysis for on-site construction.⁶⁹ As analyzed and summarized in Table IV.I-38, in Section IV.I, *Noise*, the estimated vibration velocity levels from construction equipment would exceed the 0.5 in/sec PPV threshold for the 7th Street Bridge (identified as Off Site Structure V6 in Table IV.I-38). Therefore, vibration impacts associated with structural damage from on-site construction activities would be potentially significant prior to the implementation of mitigation measures. With implementation of Mitigation Measure NOISE-MM-6: Construction Vibration (Except Shorting) the use of large bulldozers and loaded trucks shall be prohibited within 8 feet, use of jackhammers shall be prohibited within 5 feet, and the use of small bulldozers shall be prohibited within 1 foot of the 7th Street Bridge. With implementation of Mitigation Measure NOISE-MM-7: Construction Vibration (Shoring), the shoring system design and monitoring of excavation, grading, and shoring activities will be required to protect the 7th Street Bridge. Although structural damage may not occur, in the event it does, it would be repaired pursuant to Mitigation Measure NOISE-MM-8, which requires that the physical condition of the 7th Street Bridge be documented prior to the commencement of construction activity and that daily inspections occur when construction activities involving vibration-generating equipment such as bulldozers, jackhammers, loaded trucks, and drill rigs are used within 8 feet of the bridge. In the event that construction-related vibration occurs, the contractor shall arrange for inspection and repair as necessary. Implementation of vibration-related mitigation measures (Mitigation Measures NOISE-MM-6 through

⁶⁹ FTA, *Transit Noise and Vibration Impact Assessment*, p. 186.

NOISE-MM-8) would provide protections from structural damage and provisions for repair, and impacts would be reduced to less-than-significant levels.

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

(1) Impact Analysis

As a result of the SCCIC records research; land use research, including historic map analysis and historic aerial review; geoarchaeological study; review and analysis of the Preliminary Geotechnical Report prepared for the Project and provided in Appendix F-1 of this Draft EIR; review and analysis of the prehistoric and historic context of the project site and vicinity; and the archaeological resources survey conducted for the Project, no archaeological resources have been identified within the Project Site.

The earliest maps of the City of Los Angeles show the Project Site and vicinity were used as agricultural fields and vineyards as early as 1850. Prior to the settlement of the City, the area was open space with no development. Some of the buildings currently on the Project Site contain basements that extend at least one level below ground surface (bgs).

The construction of these buildings and their basements during the early 20th century likely destroyed any surficial or shallowly buried deposits. However, there are other portions of the Project Site where potentially sensitive subsurface remnants may remain that are associated with the residential dwellings that were constructed in the late 19th century with the residential single-family property owned by the railroad, or with early 20th century industrial development. Furthermore, deeply buried prehistoric archaeological resources may also remain. This includes portions of the Project Site that were never developed with buildings or where the existing buildings do not have basements, the portions of the Project Site below the foundations and/or basements, as well as off-site areas proposed for Project-related improvements, such as Mesquit Street and the Railway Properties to the east.

The Preliminary Geotechnical Report prepared for the Project indicates that the Project Site is underlain by 5 to 6 feet of artificial fill, which may contain historic period archaeological resources from past demolition on the Project Site. Project excavation would range from 61 to 68 feet bgs for the lowest subterranean parking level and 71 to 75 feet bgs in isolated areas to accommodate elevator pits. The excavation would impact both the artificial fill, as well as the native alluvial soils beneath, which have the potential to contain prehistoric and/or historic archaeological resources that could qualify as historical resources or unique archaeological resources under CEQA.

Due to the Project Site's proximity to the Los Angeles River (which is a known landmark for prehistoric habitation), soil matrices, past historic-period uses, and only moderate past disturbances, Project grading and excavation may encounter unknown archaeological resources. As a result, Project construction has the potential to disturb, damage, or

degrade archaeological resources that could be encountered during construction, thus resulting in a substantial adverse change in the significance of an archaeological resource qualifying as a historical resource or unique archaeological resources pursuant to CEQA Guidelines Section 15064.5. **Therefore, the Project could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Impacts would be significant and mitigation measures are required to ensure that impacts would be reduced to less-than-significant levels.**

(a) *Project with the Deck Concept*

Construction activities for the Project with the Deck Concept would be similar to the Project and would involve excavation and other ground-disturbing activities. The Deck would be supported by vertical columns that would be located between the existing railroad tracks. The Deck would use pre-fabricated steel or pre-cast concrete members to speed construction and minimize effects on railroad operations. Excavation depths for the Project with the Deck Concept would be the same as the Project. The foundations for the vertical columns would be drilled concrete piers, with one drilled pier below each vertical column. The piers would vary between approximately 30 to 50 feet in length. Deck construction and installation of the piers would be carried out in close coordination with the railyard authorities.

Relatively limited excavation would be required to install the piers that would support the Deck and the same general sensitivity for encountering unknown archaeological resources where excavation extends into native soil/sediment would occur under the Project with the Deck Concept. Nonetheless, due to the slightly larger construction footprint associated with the Deck construction, impacts associated with archaeological resources would be incrementally greater than under the Project. As with the Project, the Project with the Deck Concept construction has the potential to disturb, damage, or degrade archaeological resources that could be encountered during construction. **Therefore, the Project with the Deck Concept could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Impacts would be significant and mitigation measures are required to ensure that impacts are reduced to less-than-significant levels.**

(2) Mitigation Measures

The following mitigation measures are required to address the potential impacts on archaeological resources during Project and Project with the Deck Concept construction due to inadvertent discovery:

CUL-MM-5: Prior to the issuance of a demolition permit, the Applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for professional archaeology (qualified Archaeologist) to carry out and ensure proper implementation of mitigation measures that address archaeological resources. The Applicant shall submit a letter of retention to the City of Los Angeles Department of City Planning (City) no fewer than 15 days

before construction activities commence to demonstrate to the City that the Applicant has retained a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards. The letter shall include a resume for the qualified Archaeologist. The letter shall also demonstrate that a Native American Monitor from the Gabrieleño Band of Mission Indians – Kizh Nation has been retained as required by Mitigation Measure TCR-MM-1.

The qualified Archaeologist shall oversee an archaeological monitor who has a bachelor's degree in a relevant field of study and either two months of archaeological construction monitoring experience or two months of supervised training with prehistoric or historic archaeological materials in a field or laboratory setting. The archaeological monitor shall be present during construction activities on the Project Site deemed by the qualified Archeologist to have the potential for encountering archeological resources, such as demolition, pavement removal, clearing/grubbing, drilling/auguring, potholing, grading, trenching, excavation, tree removal, or other ground disturbing activity associated with the Project. The activities to be monitored may also include off-site improvements in the vicinity of the Project Site, such as utilities, sidewalks, or road improvements. The archeological monitor and Native American Monitor shall have the authority to direct the pace of construction equipment activity in areas of higher sensitivity and to temporarily divert, redirect or halt ground disturbance activities to allow identification, evaluation, and potential recovery of archaeological resources in coordination with the qualified Archaeologist. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the qualified Archaeologist after consulting with Native American Monitor.

CUL-MM-6: Prior to commencement of construction activities, a Sensitivity Training shall be given by the qualified Archaeologist and Native American Monitor for construction personnel. The training shall focus on how to identify archaeological resources and tribal cultural resources that may be encountered during construction activities, and the procedures to be followed in such an event. Within 5 days of completing the training, a list of those in attendance shall be provided by the qualified Archaeologist to the Applicant. Applicant shall maintain the documentation of this training, including the list of attendees, for inspection by the City upon its reasonable request.

CUL-MM-7: In the event that historic (e.g., bottles, foundations, refuse dumps/prives, railroads, etc.) or prehistoric (e.g., hearths, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the archaeological monitor and the Native American Monitor (in the case of prehistoric resources) in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

All resources unearthed by Project construction activities shall be evaluated by the qualified Archaeologist. If a resource is determined by the qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resource. The treatment plan established for the resource shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified Archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.

In the event encountered resources appear to qualify as tribal cultural resource, a meeting between the City, the qualified Archeologist, Native American Monitor, and the Applicant shall be held to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If the resource is determined to be a tribal cultural resource, appropriate treatment shall be determined per the procedures outlined in Mitigation Measure TCR-MM-2.

CUL-MM-8: Within 14 days of concluding the archaeological monitoring, the qualified Archaeologist shall prepare a memorandum stating that the archaeological monitoring requirement of the mitigation measure has been fulfilled and summarize the results of any archaeological finds. The memorandum shall be submitted to the Applicant and City. Following submittal of the memorandum, the qualified Archaeologist shall prepare a technical report the follows the format and content guidelines provided in California Office of Historic Preservation’s Archaeological Resource Management Reports (ARMR). The technical report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. Appropriate California Department of Parks and Recreation Site Forms (Site Forms) shall also be prepared and provided in an appendix to the report. The technical report shall be prepared under the supervision of the qualified Archaeologist and submitted to the City within 150 days of completion of the monitoring. The final draft of the report shall be submitted to the South Central Coastal Information Center.

(3) Level of Significance after Mitigation

Impacts related to archaeological resources during Project and Project with the Deck Concept construction would be reduced to less than significant with implementation of the above mitigation measures. Monitoring of the Project Site during ground disturbing activities by a professional archaeologist will result in the identification and assessment of significant or unique archaeological resources, as well as the implementation of appropriate measures in accordance with CEQA for avoidance of the resource. If the resource(s) cannot be avoided, measures for data recovery, assessment and analysis, curation, and commemoration will be implemented.

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

(1) Impact Analysis

Although no human remains were identified during the pedestrian survey of the Project Site, and no known human remains have been recorded within the Project Site or a 0.5-mile radius, the overall sensitivity of the Project Site with respect to archaeological resources is considered high as the Project Site is located in close proximity to water sources, which were used prehistorically for travel routes, as well as village or campsite locations due to the proximity of fresh water and could be the location of unknown burial sites. Therefore, the Project Site's sensitivity with respect to human remains is considered moderate.

The Project Site has been previously disturbed by the original construction of the existing land use. The review of historic aerial photographs and Sanborn Maps indicate that the Project Site has been developed from agricultural fields to industrial uses, as well as a single-family residence owned by the AT&SF Railroad (demolished by 1922) formerly located in Survey Area # 5 on the Project Site. An additional single-family residence and automobile garage were located in Survey Area #7 (demolished between 1964 and 1977).

As previously discussed, the Project Site is underlain by 5 to 6 feet of artificial fill. Given the relatively moderate degree of past disturbance within the Project Site, the depth of the proposed excavation would impact both the artificial fill layer, as well as the native soils beneath which have the potential to contain buried human remains. Human remains typically occur within the context of archaeological sites and have been found deeply buried in the vicinity of the Project Site.

Although unlikely, Project grading and excavation may encounter buried human remains. As a result, construction may disturb human remains, including those interred outside of dedicated cemeteries. However, with implementation of procedures codified in PRC Section 5097.98 and State Health and Safety Code Section 7050.5, impacts would be less than significant. No mitigation is required.

(a) *Project with the Deck Concept*

The Project with the Deck Concept would grade and excavate to the same levels as under the Project. Therefore, grading and excavation for the Project with the Deck Concept may also have the potential to encounter buried human remains. As a result, construction may disturb human remains, including those interred outside of dedicated cemeteries. However, with the implementation of procedures codified in PRC Section 5097.98 and State Health and Safety Code Section 7050.5, impacts would be less than significant. No mitigation is required.

(2) **Mitigation Measures**

Impacts regarding human remains were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) **Level of Significance after Mitigation**

Impacts regarding human remains 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.

e) Cumulative Impacts

(1) **Impact Analysis**

(a) *Historical Resources*

A significant cumulative impact associated with the Project and related projects would occur if the impact would render an historical resource as no longer eligible for listing, and the Project's contribution to the impact would be cumulatively considerable. A list of six related projects that are planned or under construction in the immediate vicinity of the Project Site that would potentially impact historical resources by demolition or alteration of an historical resource or by indirect impacts to the setting of an historical resource was compiled to support the analysis of cumulative impacts for the Project. These six related projects were selected for further analysis due to their proximity to the Project Site, which makes them more likely to result in a significant cumulative impact. As the only identified historical resource that would be directly impacted by the Project is the 7th Street Bridge, and since none of the related projects would physically affect the bridge or are close enough to result in construction vibration impacts, direct cumulative impacts to the 7th Street Bridge would not occur. Thus, the related projects are assessed for potential cumulative indirect visual effects due to proximate new construction or obstruction of important primary views to the 7th Street Bridge. The proximate related projects considered in this analysis are described as follows and analyzed below:

- **Related Project 9:** 2051 E. 7th Street. New construction of a mixed-use building, including 15,000 square feet of retail space, 5,000 square feet of restaurant space, and 320 condominium units. The new construction is replacing an ineligible one-story brick retail space and an ineligible two-story stucco commercial building that

would be removed. The project is approximately 0.1 mile (540 feet) southwest of the Project Site.

- **Related Project 12:** 2030 E. 7th Street. New construction of a mixed-use development, including 243,583 square feet of office space and 40,000 square feet of retail space. The new construction is replacing a one-story warehouse and parking lot and is located approximately 0.15 miles (786 feet) southwest of the Project Site.
- **Related Project 20:** 2130 E. Violet Street. New construction of a mixed-use development, including 90,700 square feet of office space, 6,100 square feet of ground-floor retail, and a 274-space parking structure. The new construction is replacing a warehouse and vacant lot. It is located approximately 0.15 miles (814 feet) south of the Project Site.
- **Related Project 35:** 676 Mateo Street. New construction of a mixed-use development, including 172 live/work units and 23,000 square feet of commercial space. The existing warehouse would be demolished. The new construction is located approximately 0.13 miles (707 feet) west of the Project Site.
- **Related Project 41:** 2143 E. Violet Street. New construction of a 13-story mixed-use development of live/work units and 288,000 square feet of commercial space. Corrugated metal warehouses have already been demolished on the site. It is 0.15 miles (750 feet) south of the Project Site.
- **Related Project 68:** 641 Imperial Street. New construction of a 12-story mixed-use development of 140 live/work lofts, approximately 7,000 square feet of ground-floor retail and art production space, 7,000 square feet of creative office space, and four levels of underground parking. A one-story historic retail building would be demolished for the project. It is 0.12 miles (657 feet) northwest of the Project Site.

Related Project 9 and Related Project 12 are located further to the west of the 7th Street Bridge. Therefore, cumulatively, the Project and Related Projects 9 and 12 would not alter the setting of the 7th Street Bridge or block any important views of the bridge, specifically the span of bridge over the Los Angeles River, which would still be observed from the north and the south along the Los Angeles River. Related Project 35 is located two blocks west of the Project Site, along the east side of Mateo Street. Related Project 68 is also located west of the Project Site at 641 Imperial Street. However, the settings of these related projects do not contribute to the historic setting of the 7th Street Bridge and construction of these related projects would not obstruct views of the bridge. The Project and related projects would alter the setting of the 7th Street Bridge by introducing infill development; however, the setting has already been altered with other examples of infill development constructed outside of the bridge's period of significance (1910-1927) that do not contribute to and have already detracted from the historic setting of the bridge. Therefore, the Project and related projects would not result in cumulatively considerable indirect impacts to the 7th Street Bridge.

Related Project 20 and Related Project 41 are located on the west bank of the Los Angeles River, to the south of the 7th Street Bridge and the Project Site. Related Projects 20 and 41 would potentially block views of the 7th Street Bridge's south elevation, along the bank of the river. The new construction on the Project Site, which is located north of the 7th Street Bridge, would not cumulatively contribute to that impact. Although the Project and related projects would alter the setting of the 7th Street Bridge, the setting has already been altered by infill development and no longer reflects the bridge's period of significance, as discussed above. Therefore, the Project and Related Projects 20 and 41 would not result in cumulatively considerable indirect impacts to the 7th Street Bridge.

In summary, while these related projects would alter the industrial area in the neighborhood surrounding the 7th Street Bridge, the area has already been altered by previous redevelopment and infill projects that have substantially altered the historic setting such that it does not contribute to the eligibility of the 7th Street Bridge. Furthermore, while the 7th Street Bridge did contribute to industrial development in the area as an important transportation corridor, the bridge is designated as a historic structure for its significance in architecture and engineering not for its contributions to industrial history.

As discussed above, because the related projects would not have direct impacts on the 7th Street Bridge, no direct cumulative impacts related to historical resources would occur. Furthermore, the setting of the 7th Street Bridge has been substantially compromised; therefore, potential indirect cumulative impacts to the bridge as a result of these related projects would not be significant and would not affect the eligibility of the bridge. Primary views to and from identified resources in the project vicinity would not be obstructed or altered by the Project such that the existing visual prominence and character of the historical resources within the built environment would be visually impaired. As previously evaluated, the Project would not result in significant indirect impacts to the 7th Street Bridge due to view obstruction or incompatible architecture. Therefore, Project impacts would be less than significant and would not be cumulatively considerable.

For these reasons, the Project, considered together with the related projects, would not result in a cumulatively significant impact on historical resources.

(i) Project with the Deck Concept

Overall impacts associated with historical resources are essentially the same under the Project or the Project with the Deck Concept. As with the Project, the only identified historical resource that would be directly impacted by the Project with the Deck Concept is the 7th Street Bridge, and since none of the related projects would directly affect the bridge or are close enough to result in construction vibration impacts, cumulative direct impacts would not occur. Similarly, the indirect cumulative impacts to 7th Street Bridge as a result of the Project with the Deck Concept and related projects would be less than significant. The Project with Deck Concept and Related Projects 9 and 12 would not adversely alter the setting of the 7th Street Bridge or block any important views of the

bridge, specifically the span of bridge over the Los Angeles River, which would still be observed from the north and the south along the Los Angeles River. Similarly, primary views of identified resources in the immediate vicinity of the Project with the Deck Concept would not be obstructed or altered by the Project with the Deck Concept such that the existing visual prominence and integrity of the identified historical resources within the built environment would be visually impaired.

For these reasons, the Project with the Deck Concept, considered together with the related projects, would not result in a cumulatively significant impact on historical resources.

(b) Archaeological Resources and Human Remains

Many of the related projects, including the six related projects in the Project vicinity, would be expected to require grading and excavation that have the potential to encounter archaeological resources and human remains, although in some cases, these related projects are located in developed urban areas with sites that have been previously disturbed, which would reduce the likelihood of encountering archaeological resources and human remains. As discussed above, the Project has the potential to for inadvertent archaeological discovery and would be required to implement Mitigation Measures CUL-MM-5 through CUL-MM-7, which would reduce the Projects impacts on archaeological resources to a less-than-significant level. Similarly, as part of environmental review for the related projects, it is expected that mitigation measures would be imposed where necessary to reduce the potential for significant impacts on archaeological resources, as is required by the City. In addition, each related project would be required to comply with applicable regulatory requirements, such as CEQA Guidelines Section 15064.5 and PRC Section 21083.2, which address archaeological resources, and PRC Section 5097.98 and State Health and Safety Code Section 7050.5, which address human remains. Compliance with regulatory requirements and implementation of required mitigation measures for each individual development project would ensure that impacts to archaeological resources remain less than significant and reduce the potential for the individual related projects to contribute to cumulative impacts. As such, Project impacts to archaeological resources and human remains are not cumulatively considerable and cumulative impacts would be less than significant. **For these reasons, the Project, considered together with the related projects, would not cause a cumulatively significant substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.**

(i) Project with the Deck Concept

Overall impacts associated with archaeological resources are essentially the same under the Project or the Project with the Deck Concept. Thus, the conclusions regarding cumulative impact significance presented above also apply to the Project with the Deck Concept. **Therefore, the Project with the Deck Concept, considered together with the related projects, would not cause a cumulatively significant substantial adverse**

change in the significance of an archaeological resource pursuant to Section 15064.5.

(2) Mitigation Measures

Cumulative impacts to historical and archaeological resources and human remains were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts related to historical and archaeological resources and human remains would be less than significant without mitigation.

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