

Appendix C

Archaeological Resources Assessment Memo

May 4, 2022

11510

Eyestone Environmental
2121 Rosecrans Avenue, Suite 3355
El Segundo, California 90245
Contact: Stephanie Eyestone-Jones

Subject: Archaeological Resources Assessment for the 2159 Bay Street Project, Los Angeles, California

Dear Ms. Eyestone:

This letter provides a summary of archaeological resources evaluation and management recommendations for the 2159 Bay Street Project (Project). The Project site, located at 2159 Bay Street, is situated within an industrial zone located at the southern edge of the Arts District area in Central City North Community Plan Area of the City of Los Angeles, California. The City is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA).

All cultural resources fieldwork and reporting for this Project has been conducted by staff meeting the Secretary of the Interior's Professional Qualifications Standards. Dudek archaeologist, Candise Vogel, MA, contributed to the present report. Dudek archaeologist, Linda Kry, BA, contributed to the present report and provided management oversight. Archaeological findings and recommendations and report finalization was completed by Adam Giacinto, MA, RPA. Micah Hale, PhD, RPA reviewed recommendations for regulatory compliance. The present study documents the results of a California Historical Resources Information System (CHRIS) records search conducted at the South Central Coastal Information Center (SCCIC), a Native American Heritage Commission (NAHC) Sacred Lands File (SLF), an analysis of the sensitivity of the Project site to contain archaeological resources, as well as management recommendations.

PROJECT LOCATION

The Project site is located in the Central City North Community Plan Area of the City of Los Angeles, just west of rail lines and the Los Angeles River and bound by Bay Street to the north, Sacramento Street to the south, and South Santa Fe Avenue to the west (Attachment A: Figure 1). The Project site encompasses five parcels totaling approximately 74,063 square feet of lot area (1.70 acres) and includes Assessor's Parcel Numbers (APNs) 5166-001-002 and 5166 005-008, -009, -010, and 013. The Project falls on public land survey system (PLSS) Township 1 South, Range 14 West, within an unsectioned

portion of the *Los Angeles, CA* 7.5-minute USGS Quadrangle (Attachment A: Figure 2). The City of Los Angeles (City) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA).

EXISTING ON-SITE CONDITIONS

The Project Site is currently developed with three buildings totaling 39,328 square feet of floor area. Virgin Hyperloop One currently occupies all tenant spaces at the Project Site. Existing uses include engineering and test development operations, office operations, and fabrication and machining operations. Exterior areas in the central and eastern portions of the Project Site are used for storage, equipment staging, and exterior operations. Other smaller structures at the Project Site include shipping containers that have been converted into offices and conference rooms, tents used for welding operations and meetings, and stacked parking systems. In addition, designated paved areas for storage of industrial byproducts and materials associated with on-site uses are located on-site. The Project Site is relatively flat with limited ornamental landscaping.

PROJECT DESCRIPTION

The proposed Project includes the development of a three-building creative office campus that would be comprised of a 10-story commercial high-rise building, a two-story commercial building, a one-story commercial building, and a one-story electrical enclosure. The Project would specifically include approximately 217,189 square feet of creative office space and 5,000 square feet of retail and restaurant space, for a total of 221,189 square feet of new floor area. The Project would provide a total of 711 vehicle parking spaces within up to four levels of subterranean parking and one ground floor parking level. To provide for the Project, all existing on-site uses would be removed, including the three existing buildings. The proposed Project would include excavation up to a maximum depth of 42 feet.

The Project would create a pedestrian environment along Bay Street and Sacramento Street, an area that currently lacks pedestrian infrastructure, by constructing new sidewalks, street trees, ground floor commercial space with storefront glazing, and a lobby entrance for the office/creative office tenants along a pedestrian paseo. Vehicular access to the Project would be provided from driveways located on Bay Street and Sacramento Street, and a lay-by for passenger drop-off and pick-up on Bay Street. Levels 2 through 8 of the 10-story building would include outdoor terraces for the building's office tenants, and a north-south pedestrian paseo would be provided on the eastern portion of the Project site which would link the Project's ground floor retail and restaurant components from Bay Street to Sacramento Street.

REGULATORY CONTEXT

This section includes a discussion of the applicable state laws, ordinances, regulations, and standards governing cultural resources, which must be adhered to before and during construction of the proposed Project.

State

The California Register of Historical Resources (CRHR)

In California, the term “historical resource” includes, but is not limited to, “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (California Public Resources Code (PRC), Section 5020.1(j)). In 1992, the California legislature established the California Register of Historical Resources (CRHR) “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC Section 5024.1(a)). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated below. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains “substantial integrity,” and (ii) meets at least one of the following criteria:

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

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 California Code of Regulations [CCR] 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

As described further, the following CEQA statutes (PRC Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines “unique archaeological resource.”
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines “historical resources.” In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource”; it also defines the circumstances when a project would materially impair the significance of a historical resource.
- PRC Section 21074(a) defines “tribal cultural resources.”
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; CEQA Guidelines Section 15064.5(b)). If a site is listed or eligible for listing in the CRHR, or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1(q)), it is an “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1); PRC Section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project does any of the following:

- (1) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- (2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g)

of the PRC, 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

- (3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that 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 (CEQA Guidelines Section 15064.5(b)(2)).

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any “historical resources,” then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2(a)–(c)).

Section 21083.2(g) defines a unique archaeological resource as 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 that 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.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Section 21083.2(g)).

Impacts on non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)). However, if a non-unique archaeological resource qualifies as a TCR (PRC Sections 21074(c) and 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in PRC Section 5097.98.

California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other

than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5(b)). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact NAHC within 24 hours (Section 7050.5(c)). NAHC will notify the “most likely descendant.” With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

Local Regulations

Los Angeles Historic-Cultural Monuments

Local landmarks in the City of Los Angeles are known as Historic-Cultural Monument (HCMs) and are under the aegis of the Planning Department, Office of Historic Resources. They are defined in the Cultural Heritage Ordinance as follows (Los Angeles Municipal Code Section 22.171.7, added by Ordinance No. 178,402, effective April 2, 2007):

Historic-Cultural Monument (Monument) 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 of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

This definition has been broken down into four HCM designation criteria that closely parallel the existing NRHP and CRHR criteria – the HCM:

1. Is identified with important events in the main currents of national, State or local history, or exemplifies significant contributions to the broad cultural, political, economic or social history of the nation, state, city, or community; or
2. Is associated with the lives of Historic Personages important to national, state, city, or local history; or
3. 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 genius influenced his or her age; or possesses high artistic values; or

4. Has yielded, or has the potential to yield, information important to the pre-history or history of the nation, state, city or community.

BACKGROUND RESEARCH

SCCIC Records Search

A California Historical Resources Information Systems (CHRIS) records search for the Project site and a 0.5-mile records search radius was performed by Staff at the South Central Coastal Information Center (SCCIC) on August 28, 2018. This search included their collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, and ethnographic references. Additional consulted sources included historical maps of the Project site, the NRHP, the CRHR, the California Historic Property Data File, the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. The results of the records search are presented in non-confidential Attachment B.

Previously Conducted Cultural Resource Studies

Results of the cultural resources records search indicated that 39 previous cultural resource studies have been conducted within the 0.5-mile records search area between 1990 and 2017. None of the studies identified overlap the Project site. Table 1, below, summarizes all 39 previously conducted cultural resource studies within the 0.5-mile records search area.

Table 1. Previous Technical Studies Within 0.5 Mile of the Project Site

SCCIC Report No.	Authors	Date	Title	Within or Outside Project Site
LA-02143	Alexander, Molly B.	1990	An Archaeological Survey of 30371 Morning View Drive, Malibu, California	Outside
LA-02577	Wlodarski, Robert J.	1992	Results of a Records Search Phase Conducted for the Proposed Alameda Corridor Project, Los Angeles County, California	Outside
LA-02644	Wlodarski, Robert J.	1992	The Results of a Phase 1 Archaeological Study for the Proposed Alameda Transportation Corridor Project, Los Angeles County, California	Outside
LA-02788	Brown, Joan C.	1992	Archaeological Literature and Records Review, and Impact Analysis for the Eastside Corridor Alternatives Los Angeles, California	Outside
LA-03103	Greenwood, Roberta S.	1993	Cultural Resources Impact Mitigation Program Angeles Metro Red Line Segment 1	Outside
LA-03115	Wlodarski, Robert J.	1995	Addendum Report: Results of a Phase 1 Archaeological Study of the Proposed Construction of the Whittier Boulevard Shaft Site East Central Interceptor Sewer Project, East-west Alignment, Los Angeles County	Outside
LA-03813	Anonymous	1992	An Archival Study of a Segment of the Proposed Pacific Pipeline, City of Los Angeles, California	Outside

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SCCIC Report No.	Authors	Date	Title	Within or Outside Project Site
LA-04211	Brechbiel, Brant A.	1998	Cultural Resources Records Search and Literature Review Report for a Pacific Bell Mobile Services Telecommunications Facility: La 058-03 in the City of Los Angeles, California	Outside
LA-04220	Lee, Portia		Seismic Retrofit of Olympic Boulevard Bridge Over the Los Angeles River	Outside
LA-04448	Richard Starzak	1994	Section 106 Documentation for the Metro Rail Red Line East Extension in the City and County of Los Angeles, California	Outside
LA-04625	Starzak, Richard	1994	Historic Property Survey Report for the Proposed Alameda Corridor From the Ports of Long Beach and Los Angeles to Downtown Los Angeles in Los Angeles County, California	Outside
LA-04834	Ashkar, Shahira	1999	Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Anaheim, Los Angeles and Orange Counties	Outside
LA-04835	Ashkar, Shahira	1999	Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Riverside, Los Angeles and Riverside Counties	Outside
LA-04883	Storey, Noelle	2000	Negative Archaeological Survey Report - Highway Project Description	Outside
LA-05440	Sylvia, Barbara	2001	Negative Archaeological Survey Report:07-la-5-25.9/27.0-07-174-053511, Soundwall Construction Along Route 5 Southbound	Outside
LA-06837	Greenwood, Roberta S.	2003	Cultural Resources Monitoring: Northeast Interceptor Sewer Project	Outside
LA-07074	O'Neil, Stephen and Joan Brown	2003	Monitoring of Construction During Trenching at the New Cemetery, Mission San Gabriel California	Outside
LA-07425	McMorris, Christopher	2004	City of Los Angeles Monumental Bridges 1900-1950: Historic Context and Evaluation Guidelines	Outside
LA-07427	McMorris, Christopher	2004	Caltrans Historic Bridge Inventory Update: Metal Truss, Movable, and Steel Arch Bridges	Outside
LA-08252	Snyder, John W., Mikesell, Stephen, and Pierzinski	1986	Request for Determination of Eligibility for Inclusion in the National Register of Historic Places/Historic Bridges in California: Concrete Arch, Suspension, Steel Girder and Steel Arch	Outside
LA-08518	Taniguchi, Christeen	2004	Historic Architectural Survey and Section 106 Compliance for a Proposed Wireless Telecommunications Service Facility Located on a Warehouse Building in the City of Los Angeles (Los Angeles County), California	Outside
LA-08735	Bonner, Wayne H.	2007	Cultural Resources Records Search and Site Visit Results for Royal Street Communications, LLC Candidate La2299a (SCE Repetto Substations), 1371 Monterey Pass Road, Monterey Park, Los Angeles County, California	Outside

Table 1. Previous Technical Studies Within 0.5 Mile of the Project Site

SCCIC Report No.	Authors	Date	Title	Within or Outside Project Site
LA-09110	Bonner, Wayne H.	2007	Cultural Resources Records Search and Site Visit Results for Sprint Nextel Candidate LA73XC116B (Hardwood), South Santa Fe Avenue, Los Angeles, Los Angeles County, California	Outside
LA-09271	Strauss, Monica, Candace Ehringer, and Angel Tomes	2007	Archaeological Resources Assessment and Evaluation of "Maintenance of Way" Building for the Asphalt Plant No. 1 Street Services Truck Route Project City of Los Angeles, California	Outside
LA-09844	Anonymous	2001	Draft: Los Angeles Eastside Corridor, Revised Cultural Resources Technical Report, Final Supplemental Environmental Impact Statement/Final Subsequent Environmental Impact Report	Outside
LA-10451	Chasteen, Carrie	2008	Finding of Effect - 6th Street Viaduct Seismic Improvement Project	Outside
LA-10452	Smith, Francesca	2007	Historical Resources Evaluation Report - 6th Street Viaduct Seismic Improvement Project	Outside
LA-10506	Greenwood, Roberta S., Scott Savastio, and Peter Messick	2004	Cultural Resources Monitoring: North Outfall Sewer - East Central Interceptor Sewer Project	Outside
LA-10638	Tang, Bai "Tom"	2010	Preliminary Historical/ Archaeological Resources Study, Southern California Regional Rail Authority (SCRRA) River Subdivision Positive Train Control Project, City of Los Angeles, Los Angeles County, California	Outside
LA-10789	Carmack, Shannon and Cheryle Hunt	2010	Cultural Resources Technical Report for the Olympic and Mateo Street Improvements Project, City of Los Angeles, Los Angeles County, California	Outside
LA-10887	Starzak, Richard, Alma Carlisle, Gail Miller, Catherine Barner, and Jessica Feldman	2001	Historic Property Survey Report for the North Outfall Sewer-East Central Interceptor Sewer, City of Los Angeles, County of Los Angeles, California	Outside
LA-11048	Speed, Lawrence	2009	American Recovery and Reinvestment Act (ARRA) Funded Security Enhancement Project (PRJ29112359) - Improved Access Controls, Station Hardening, CCTV Surveillance System, and Airborne Particle Detection at Los Angeles Station and Maintenance Yard, LA, CA	Outside
LA-11166	Slawson, Dana N.	2011	Archaeological Monitoring Report - Asphalt Plant No. 1 Project, 2484 East Olympic Boulevard, Los Angeles, California	Outside
LA-11409	Horne, Melinda C.	2000	Construction Phase Cultural Resources Monitoring and Treatment Plan for the City of Los Angeles North Outfall - East Central Interceptor Sewer Project	Outside
LA-11642	Daly, Pam and Sikes, Nancy	2012	Westside Subway Extension Project, Historic Properties and Archaeological Resources Supplemental Survey Technical Reports	Outside

Table 1. Previous Technical Studies Within 0.5 Mile of the Project Site

SCCIC Report No.	Authors	Date	Title	Within or Outside Project Site
LA-11785	Rogers, Leslie	2012	Final Environmental Impact Statement/Final Environmental Impact Report for the Westside Subway Extension	Outside
LA-12381	Fulton, Phil	2013	Cultural Resources Assessment Class I Inventory, Verizon Wireless Services Metro Relo Facility City of Los Angeles, Los Angeles County, California	Outside
LA-12586	Glenn, Brian and Maxon, Patrick	2008	Archaeological Survey Report for the 6th Street Viaduct Improvement Project City of Los Angeles Los Angeles County, California	Outside
LA-13239	Gust, Sherri	2017	Extent of Zanja Madre	Outside

LA-13239 (Gust 2017)

One report, LA-13239, prepared by Cogstone Environmental, identifies the extent of the zanja network (Gust 2017). The zanja network was Los Angeles’ original irrigation system, and the network is thought to have run throughout the city in various branches, predominantly along major roads. The location of many of the segments are unconfirmed; however, the believed route has been mapped by Gumprecht (2001) who incorporated information from multiple historical works, particularly a report on irrigation by State Engineer William Hamilton Hall (Hall 1888). Using Gumprecht’s 2001 work, Cogstone Environmental prepared a series of maps for the Downtown Los Angeles area, which shows an unconfirmed section of a historical-era water conveyance system running south along or near Mateo Street, approximately 0.20 miles west of the Project site. This zanja segment has been identified by Gumprecht (2001: 77) as Zanja No. 1.

While the Cogstone study provides a valuable review of available documentation pertaining to this historic water conveyance feature, the existing information does not provide evidence indicating that these features are present within the Project site. Specific restrictions to the accuracy of this study were presented by the age and generalized quality of the records representing the route of the feature, the absence of physical evidence confirming a specific route of Zanja No. 1 adjacent to or within the Project site, and the degree of urbanization that has occurred in the more than 100 years since the zanja network was abandoned (Gumprecht 2001).

Previously Recorded Cultural Resources

SCCIC records indicate that a total of 78 previously recorded cultural resources fall within the 0.5-mile search area, none of which are within the Project site. Of these, 74 are historic-era buildings or structures. The remaining resources include four historic-era archaeological sites (P-19-003683, P-19-003777, P-19-004192, and P-19-004193). These sites consist of refuse scatters dating to between 1880 and 1945 (P-19-003693), between 1850 and 1915 (P-19-003777), and between 1914 and 1945 (P-19-004192 and P-19-004193). No resources identified within this records search area are documented in association with

historic-era zanja features, which has been represented on historical maps to have run approximately 0.20 miles west of the Project site. No physical evidence of the zanja has been documented to date in the vicinity. Furthermore, no previously recorded prehistoric archaeological sites have been documented with the search area according to the SCCIC records search. Table 2, below, summarizes the four archaeological sites within the records search area in additional detail followed by a brief history of the zanja system.

Table 2. Previously Recorded Archaeological Resources Within 0.5 Mile of the Project Site

Primary Number	Trinomial	Age	Resource Type	Description	Recorded By and Year	Proximity to Project Site
P-19-003683		Historic	Site	Historic-era refuse scatter	2003 (Alice Hale)	Outside
P-19-003777	CA-LAN-003777H	Historic	Site	Historic-era refuse scatter	2008 (Candace Ehringer, Frank Humphries, EDAW, Inc.); 2011 (Dana Slawson, Greenwood and Associates)	Outside
P-19-004103	CA-LAN-004103	Historic	Site	Historic-era refuse scatter	2009 (Barbara Tejada, Erin Smith, Marla Mealey, Katie Brown, and Patricia McFarland, Cal. Dept. of Parks & Rec)	Outside
P-19-004192	CA-LAN-004192H	Historic	Site	Historic-era refuse scatter	2010 (L. Solis, N. Orsi, URS Corporation)	Outside

OVERVIEW OF THE ZANJA SYSTEM

The zanja network was Los Angeles’ original irrigation system, and the network is thought to have run throughout the city in various branches, predominantly along major roads. The water conveyance system consisted of interconnected ditches known as “zanjas” and was established in 1781 at the same time that El Pueblo de la Reyna de Los Angeles (The Town of Los Angeles) was founded. The first segment of the system was known as the Zanja Madre, and is thought to have run from a point on the Los Angeles River north of the city, south near present-day Main Street, originally terminating near the Plaza close to present-day Union Station (Gumprecht 2001: 58). The Zanja Madre was eventually extended south along Los Angeles Street until reaching East 1st street. Though researchers and the public often use the term “Zanja Madre” to refer to the larger water conveyance network, this term more accurately describes just the initial component established during the Spanish Period. The segments that were added on later were numbered and grouped based on what part of the city they reached and from where on the Los Angeles River they drew water. The size of Los Angeles did not necessitate an expansive system for the first half of the nineteenth century, and there were only three additional segments by 1849. As the city rapidly grew, water become a growing concern particularly because much of the land was agricultural and irrigation was

crucial to farmers' success. As a result, several new zanja segments were constructed after 1855 (Gumprecht 2001: 58-61).

By 1870, the Zanja Madre, being the most important canal in the system, was maintained at a width of ten feet along its entire length, and eight other zanja segments had also been built within the city (Gumprecht 2001: 61). By the late nineteenth century, there were a total of 19 zanja segments. As the city became more populated and more open zanjias were built throughout the city center, an increasing number of fatal drownings began to occur. Another concern surrounding the zanjias was their use as waste disposal and for bathing and laundry by many in the fledgling city (Gumprecht 2001: 62-63; Sklar 2008: 19). This fact led to dysentery and other health problems becoming a common problem in the city causing anger and outrage among the citizens. As early as the 1850s the zanjias were so filthy that wealthy Angelenos refused to get their drinking water from them; instead, paying for water taken directly from the river (Gumprecht 2001: 62-63). Public outcry over the drownings and the overall cleanliness of the zanjias reached a point where the city was forced to take action which resulted in almost all of the zanja segments being enclosed either by concrete piping, or wooden flumes by the mid-1880s (Meares 2016; Mulholland 2002: 18; Gumprecht 2001: 73, 88). The late nineteenth century saw the beginning of the abandonment of the zanjias and Zanja No. 5 was reportedly the first to be abandoned in 1888 (Gumprecht 2001: 89). By 1904, the last two zanjias, the Woolen Mill Ditch and Zanja No. 8-R were abandoned. At this point, any zanja segment that had not been adopted into the city's water system was either destroyed or built over (Gumprecht 2001: 97).

Zanjias Near the Project Site

Dudek reviewed information detailing the original Zanja Madre network and subsequently constructed segments, including William Hall's 1888 study of irrigation in Southern California (Hall 1888), and Blake Gumprecht's work on the History of the Los Angeles River (Gumprecht 2001). The review suggests that a portion of the zanja network may be present within the vicinity of the Project site. A series of maps prepared by Cogstone Environmental (Gust 2012; Attachment C: Confidential Report LA-13239) for the Downtown Los Angeles area indicates that two separate branches of the same zanja segment, Zanja No. 1, are mapped near the Project site. The western branch of Zanja No. 1 approximately 0.20 miles west of the Project site. The eastern branch of Zanja No. 1, approximately 0.20 east of the Project site, is mapped to the east side of the now channelized Los Angeles River and as such, has a lower potential to be within or in the immediate vicinity of the Project site and is therefore, not discussed.

The unconfirmed zanja segment mapped approximately 0.20 miles to the west of the Project site has been identified in Gumprecht 2001 and Hall 1888 as Zanja No. 1, which was described by Hall as a wooden flume, that was noted as not located, but described to be 800 feet in length, followed by a section that is cement pipe measuring 16 inches in diameter and 3,200 feet in length, once again, not located, and lastly, a portion that is open ditch that extends to the city boundary (present-day Washington Boulevard) and was 9,625 feet in length. As described in Hall's 1888 work, Zanja No. 1 was the western branch of the low-service system, so named because this group of canals distributed water that was taken from a lower

elevation of the Los Angeles River, while the high-system distributed water that was taken from a higher elevation on the river.

According to the sources referenced, Zanja No. 1 extended from the end of Zanja No. 6-1, at South Hewitt Street, between and East 1st and East 2nd Streets. The segment then trends southeast towards the intersection of South Garey Street and East 2nd Street, then redirects and trends southward, generally along the east side of South Garey Street, Molino Street, and Mateo Street and terminating at the intersection of Mateo Street and Washington Boulevard (Gumprecht 2001: 72; Hall 1888: 545; Gust 2012).

Based on the method of construction for Zanja No. 1, specifically portions constructed of wooden flume and open ditch, and nature of this feature, which originally ran along roads just below the ground surface, it is very unlikely that even if a portion of Zanja No. 1 ran through the Project site, it would remain intact. Development over the course of the twentieth century would likely have resulted in the destruction of much of the zanjas; though it is always possible remnant portions are still buried below the surface or were adopted into the city's infrastructure. The zanja network required construction and maintenance staff. As such, historical refuse deposits created by these workers could be found in association with the zanja alignments. It should be noted that no sources consulted identify Zanja No. 1 as running within or adjacent to the Project site; so, though their existence subsurface is possible, it appears unlikely they would be identified within the Project site during Project implementation.

NATIVE AMERICAN HERITAGE COMMISSION SACRED LANDS FILE SEARCH

As part of the process of identifying cultural resources within or near the Project, Dudek contacted the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File (SLF) in June 2018. The NAHC emailed a response on July 12, 2018 stating that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC suggested contacting Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project. The NAHC provided the contact information of 10 individuals and/or tribal organizations with whom to contact along with the SLF search results. No additional tribal outreach was conducted by Dudek. Documents related to the NAHC SLF search are included in non-confidential Attachment D.

ARCHIVAL RESEARCH

Dudek consulted historic maps and aerial photographs to understand development of the Project site and surrounding properties. Topographic maps are available from 1894 to the present (NETR 2018a) and aerial images are available from 1948 to the present (NETR 2018b). Sanborn maps were available for the years 1906 and 1953 (Sanborn Map Company 1906 and 1953).

The first USGS topographic map showing the Project site dates to 1894 and is depicted as undeveloped. In this map the railroad lines are visible to the east, as is the Los Angeles River. There were several small developments in the general vicinity and much of the surrounding streets had already been laid out. The topographic maps show little change until 1928 when the railroad lines had been extensively expanded and included offshoots to the west. These maps also show that there was a dramatic increase in the density of the development in the area. At this time, the Project vicinity was still largely undeveloped though there are four structures depicted at the eastern edge of the block where the project site is located. Additionally, a rail line is depicted as running north through the project site and then parallels its northern boundary. According to these maps the project site was developed sometime before 1956. Topographic maps from later decades do not show extensive changes within the project site aside from a general increase in density in the city overall.

Historic aerials from 1948 shows that the Project vicinity at this time was developed and that at least one of the extant buildings within the Project site appear to have been built by this time. According to the City of Los Angeles Department of Building and Safety records, the Project site was first developed in 1924. The surrounding area was almost completely developed by 1948 though, much of the area experiences some form of redevelopment over time.

The earliest Sanborn Map depicting the Project site, from 1906, shows the block between Bay Street and Sacramento Street as a commercial and industrial zone (Attachment A: Figure 3). The railway is located immediately east of the Project site and connects to the sector both north and south of Bay Street with spur tracks. Directly within the Project site are structures that are labelled with both solid and dotted lines. Notes on the margins of these structures indicate that at this time, the Project site was a staging area for “sacking and mixing machines.” This staging area is reported by the 1906 map as a wooden structure with a concrete platform that also has wooden ramps that connect the Project site to a chemical warehouse to the immediate west of the lot. This warehouse sits between the southernmost spur track and the Bay Street thoroughfare. There is one water pipe on Bay Street that is noted to be a 6-foot water pipe. No references are made regarding any zanja segments in or around the Project site. The nearest location noted by the Sanborn maps in 1906 occurs 1.1 miles away at the intersection of 6th Street and Central Avenue, extending east and west, well outside of the Project site.

There are no changes to the Project site on the 1953 map, only minor additions to other lots in its vicinity (Attachment A: Figure 4). The vacant lot to the north of the Project site now notes the presence of talc piles next to the previously existing talc mill. The talc mill’s staging area is smaller and some dotted line structures exist between the talc pile and Project site. No references are made for this year for any zanja segments in or around the Project site.

FIELD SURVEY

Given that the Project site is completely developed with no visible ground surface, an archaeological pedestrian survey was not warranted.

SENSITIVITY ANALYSIS

Archaeological Sensitivity

No archaeological resources were identified within, or in the vicinity of the Project site through SCCIC records, SLF review, or archival research. The archaeological record for the surrounding 0.5-mile area includes no previously recorded prehistoric archaeological sites and four historic-age refuse deposits. Additionally, no resources identified within this records search area are documented in association with historic-era zanja features. As previously noted, one segment of the zanja network, Zanja No. 1, has been represented on historical maps west of the Project site and a thorough review of historic sources, including historical documents, academic research, maps, and aerials have not shown Zanja No. 1 to be located within or directly adjacent the Project site. Furthermore, the Project site was developed by the 1920s and has been substantially disturbed as a result. Considering these factors, the potential for buried prehistoric-era and historic-era archaeological deposits to exist within the Project Site is considered to be unlikely.

MANAGEMENT RECOMENDATIONS

No archaeological resources were identified within the Project site or immediate vicinity as a result of the records searches and archival review. Segments of the zanja network, specifically Zanja No. 1, has been mapped in the vicinity of the Project site, though no documentation was found depicting this segment within or immediately adjacent to the Project site. Based on these results, and in consideration of the severity of past impacts to subsurface soils that would have occurred during construction of the buildings occupying the Project site, it appears there is little potential that any intact archaeological resources are present that could be impacted as a result of Project implementation. However, it is always possible that intact archaeological deposits and/or features are present at subsurface levels.

Based on reviewed information, Project implementation and construction would result in a less than significant impact. The following recommendations are provided to ensure that proper treatment occurs for unanticipated archaeological resources and human remains during construction activities.

RECOMMENDATIONS

Archaeological Resources

While no archaeological resources are anticipated to be affected by the Project, the possibility exists that unknown and unanticipated intact archaeological resources may be present subsurface.

The City has established a standard Condition of Approval to address the inadvertent discovery of archaeological resources. In the event a possible archaeological resource is uncovered during earthwork or construction, the Condition of Approval requires the cessation of all work within the immediate area until a Qualified Archaeologist has been retained to evaluate the find in accordance with National Register and California Register criteria. If determined by the Qualified Archaeologist to be a unique archeological

resource, the find shall be handled, treated, preserved, and recorded in accordance with PRC Section 21083.2. A report that describes the resource and its disposition, as well as the assessment methodology, shall be prepared by the Qualified Archaeologist according to current professional standards. If appropriate, the report should also contain the Qualified Archaeologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los Angeles County. Ground disturbance activities in the area of the find may recommence once the identified resource is properly assessed and processed. In summary, should a potential archaeological resource be inadvertently encountered during Project excavation and grading activities, the Project would implement the City's standard Condition of Approval for the inadvertent discovery of archaeological resources.

Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the county coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the county coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

Should you have any questions relating to this report and its findings, please do not hesitate to contact me directly at lkry@dudek.com or phone at (626) 590-1739 or Adam Giacinto at agiacinto@dudek.com or phone at (225) 892-7622.

Respectfully Submitted,



Linda Kry, BA
Archaeologist



Adam Giacinto, M.A., RPA
Archaeologist

Cc: Micah Hale, Dudek

*Att: A: Figures
B: Non-Confidential SCCIC Records Search Results
C: Confidential Report LA-13239*

D: Non-Confidential NAHC SLF Results

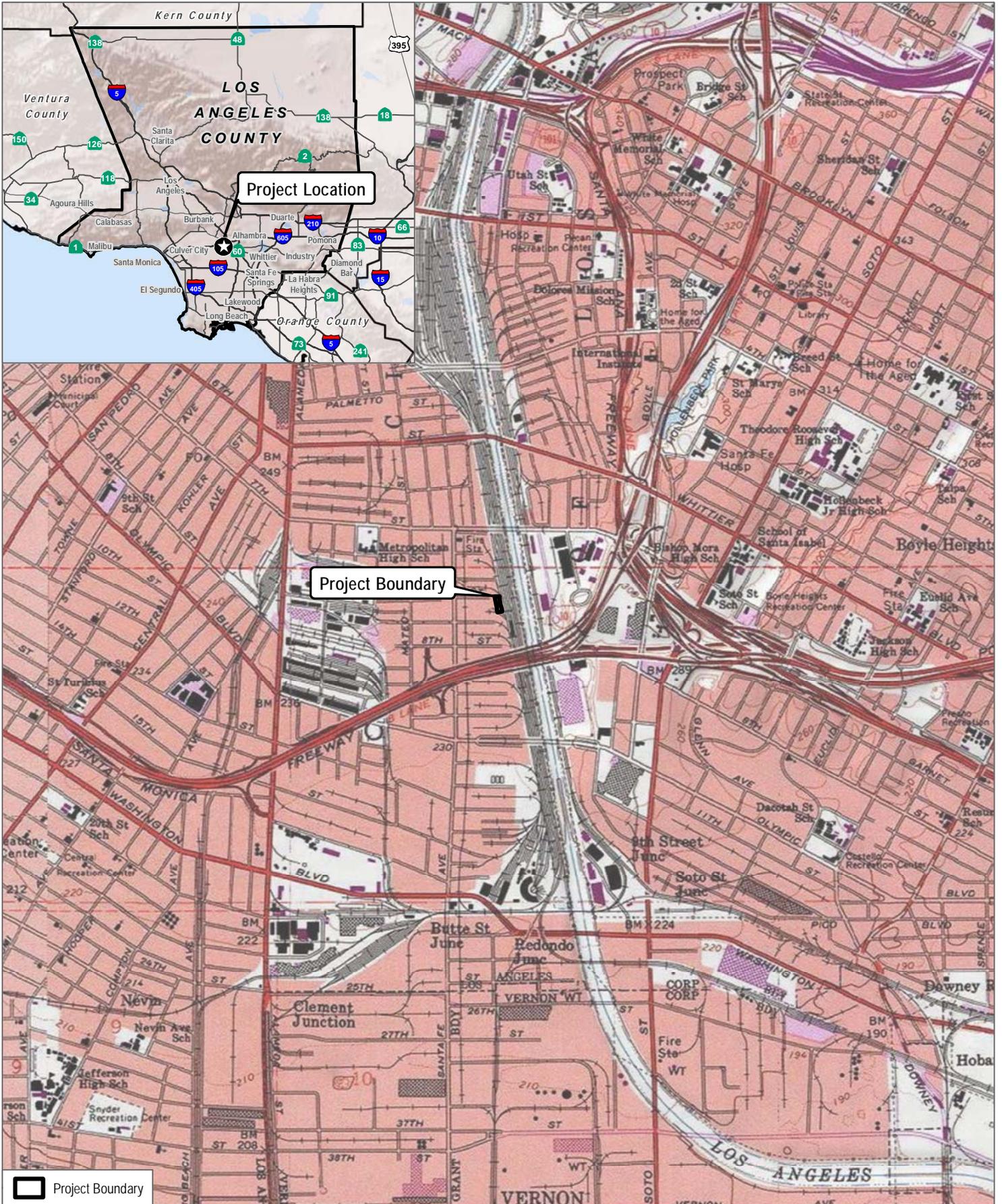
REFERENCES

- Gust, Sherri. 2012. Extent of the Zanja Madre. Prepared by Cogstone Environmental. On file with the SCCIC.
- Gumprecht, Black. 2001. *The Los Angeles River: Its Life, Death, and Possible Rebirth*. The Johns Hopkins University Press. Baltimore, Maryland.
- Hall, William Hamilton. 1888. *Irrigation in California (Southern)*. Office of State Engineer: Sacramento, California.
- Humphries, Frank and Candace Ehringer 2008. DPR Site Record for P-19-004113. AECOM. Site record on file with the South Central Coast Information Center
- Mearns, Hadley. Life and Death on LA's First Water System. Electronic resource, <https://la.curbed.com/2016/4/28/11490196/zanjas-los-angeles-history-water>, accessed December 5, 2018.
- Mulholland, Catherine. 2002. *William Mulholland and the Rise of Los Angeles*. University of California Press. Los Angeles, California.
- NETR (Nationwide Environmental Title Research LLC). 2018a. Historic Topographic Maps: 1894 to present. Accessed May 2018. <https://www.historicaerials.com/viewer>.
- NETR. 2018b. Historic Aerial Photographs: 1948 to present. Accessed May 2018. <https://www.historicaerials.com/viewer>.
- Sanborn Map Company. 1906. Insurance Maps of Los Angeles, CA. Volume 2. Sheet 227. Sanborn Map & Publishing Co. New York, New York. Accessed January 24, 2020. <http://sanborn.umi.com.ezproxy.lapl.org/>
- Sanborn Map Company. 1953. Insurance Maps of Los Angeles, CA. Volume 2. Sheet 227. Sanborn Map & Publishing Co. New York, New York. Accessed January 24, 2020. <http://sanborn.umi.com.ezproxy.lapl.org/>
- Sklar, Anna. 2008. *Brown Acres: An Intimate History of the Los Angeles Sewers*. Angel City Press. Los Angeles, California.

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ATTACHMENT A

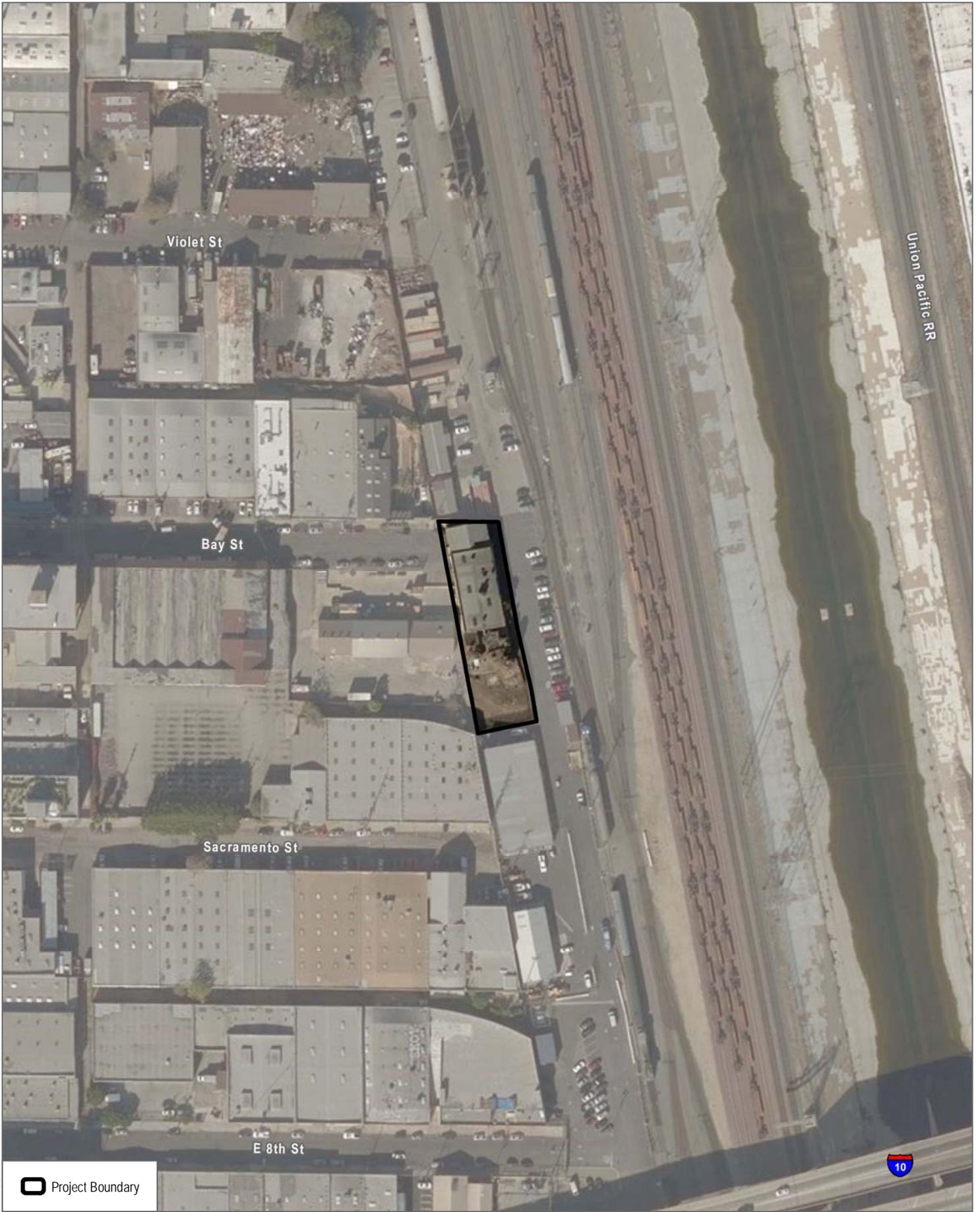
Figures



SOURCE: USGS 7.5-Minute Series Los Angeles Quadrangle
Township 2S / Range 13W / Section 3



FIGURE 1
Project Location



SOURCE: Bing Maps 2018; Los Angeles County 2017



Union Pacific RR



FIGURE 2
Project Aerial

227
LOS ANGELES Vol. 2

E. 7TH PL. 208 ST.

226

SANTA FE AV.

225

228

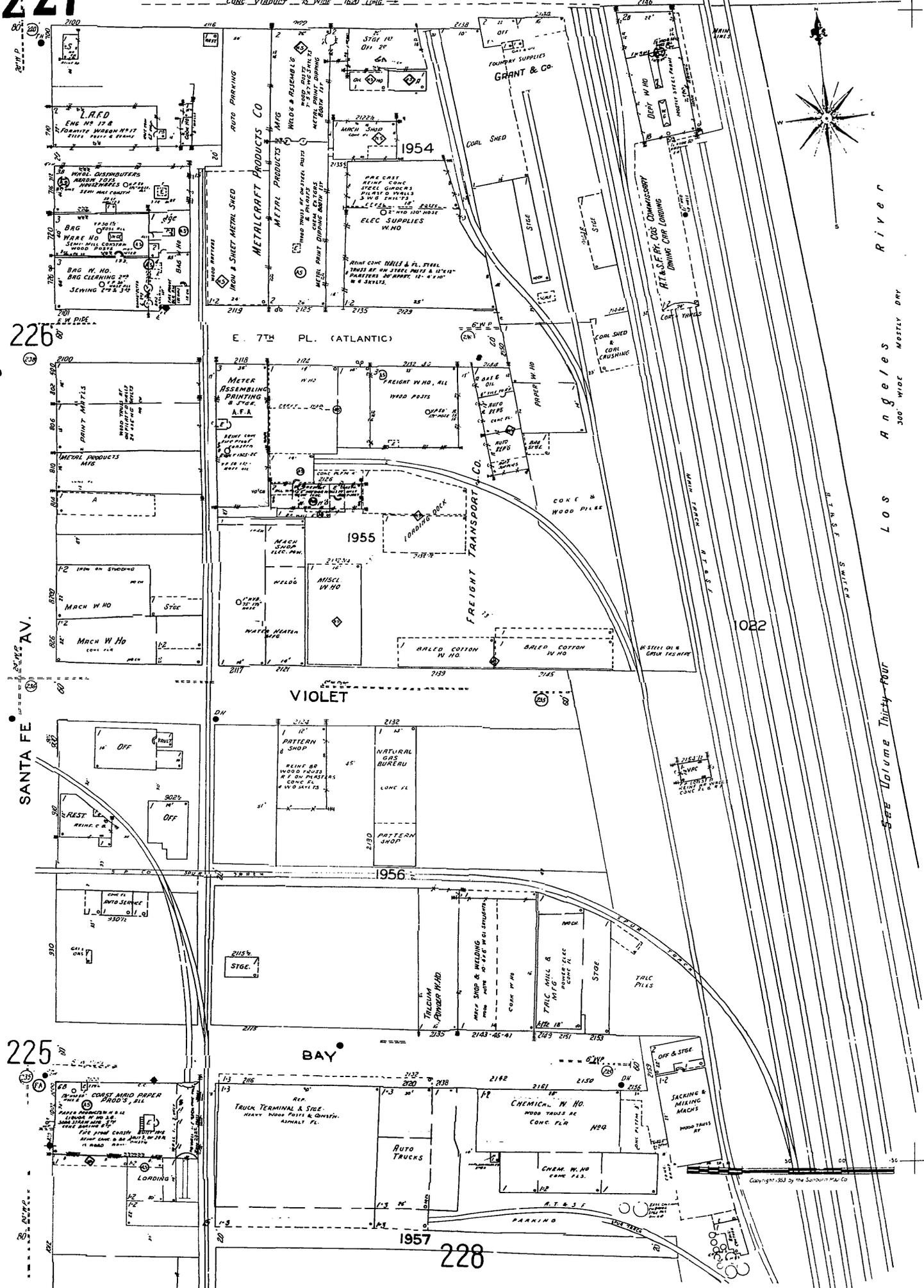


Figure 4. 1953 Sanborn Map

*Subject: Archaeological Resources Assessment for the 2159 Bay Street Project, Los Angeles,
California*

ATTACHMENT B

Non-Confidential SCCIC Records Search Results

South Central Coastal Information Center

California State University, Fullerton
Department of Anthropology MH-426
800 North State College Boulevard
Fullerton, CA 92834-6846
657.278.5395 / FAX 657.278.5542

sccic@fullerton.edu

California Historical Resources Information System
Orange, Los Angeles, and Ventura Counties

8/28/2018

SCCIC File #: 19296.5275

Stephanie Eyestone-Jones
Eyestone Environmental
2121 Rosecrans Avenue, Suite 3355
El Segundo, CA 90245

Re: Record Search Results for the 2159 Bay Street Project, City of Los Angeles, California

The South Central Coastal Information Center received your records search request for the project area referenced above, located on the Los Angeles, CA USGS 7.5' quadrangle. The following summary reflects the results of the records search for the project area and a ½-mile radius. The search includes a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), the California State Historic Properties Directory (HPD), and the City of Los Angeles Historic-Cultural Monuments (LAHCM) listings were reviewed for the above referenced project site and a ¼-mile. Due to the sensitive nature of cultural resources, archaeological site locations are not released.

RECORDS SEARCH RESULTS SUMMARY

Archaeological Resources	Within project area: 0 Within project radius: 4
Built-Environment Resources	Within project area: 0 Within project radius: 74
Reports and Studies	Within project area: 0 Within project radius: 39
OHP Historic Properties Directory (HPD)	Within project area: 0 Within ¼-mile radius: 1
California Points of Historical Interest (SPHI)	Within project area: 0 Within ¼-mile radius: 0
California Historical Landmarks (SHL)	Within project area: 0 Within ¼-mile radius: 0
California Register of Historical Resources (CAL REG)	Within project area: 0 Within ¼-mile radius: 0
National Register of Historic Places (NRHP)	Within project area: 0 Within ¼-mile radius: 0

Archaeological Determinations of Eligibility (ADOE):	Within project area: 0 Within project radius: 0
City of Los Angeles Historic-Cultural Monuments (LAHCM)	Within project area: 0 Within ¼-mile radius: 0

HISTORIC MAP REVIEW - Pasadena, CA (1900) 15' USGS historic map indicates that in 1900 there was no visible development within the project area. The AT & SF rail line, the Los Angeles Terminal (San Pedro Div.), and the Los Angeles River ran east of the project area. There were several buildings and roads within the project search radius which was located in the historic place name of Los Angeles.

RECOMMENDATIONS

The archaeological sensitivity of the project location is unknown because there are no previous studies for the subject property. Additionally, the natural ground-surface appears to be obscured by urban development; consequently, surface artifacts would not be visible during a survey. While there are currently no recorded archaeological sites within the project area, buried resources could potentially be unearthed during project activities. Therefore, customary caution and a halt-work condition should be in place for all ground-disturbing activities. In the event that any evidence of cultural resources is discovered, all work within the vicinity of the find should stop until a qualified archaeological consultant can assess the find and make recommendations. Excavation of potential cultural resources should not be attempted by project personnel. It is also recommended that the Native American Heritage Commission be consulted to identify if any additional traditional cultural properties or other sacred sites are known to be in the area. The NAHC may also refer you to local tribes with particular knowledge of potential sensitivity. The NAHC and local tribes may offer additional recommendations to what is provided here and may request an archaeological monitor. Finally, if the built-environment resources on the property are 45 years or older, a qualified architectural historian should be retained to study the property and make recommendations regarding those structures.

For your convenience, you may find a professional consultant* at www.chrisinfo.org. Any resulting reports by the qualified consultant should be submitted to the South Central Coastal Information Center as soon as possible.

*The SCCIC does not endorse any particular consultant and makes no claims about the qualifications of any person listed. Each consultant on this list self-reports that they meet current professional standards.

If you have any questions regarding the results presented herein, please contact the office at 657.278.5395 Monday through Thursday 9:00 am to 3:30 pm. Should you require any additional information for the above referenced project, reference the SCCIC number listed above when making inquiries. Requests made after initial invoicing will result in the preparation of a separate invoice.

Thank you for using the [California Historical Resources Information System](#),

Isabela Kott
GIS Technician/Staff Researcher

Enclosures:

(X) Invoice # 19296.5275

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

*Subject: Archaeological Resources Assessment for the 2159 Bay Street Project, Los Angeles,
California*

ATTACHMENT C

Confidential Report LA-13239

Archaeological Resources confidential information:
On file with City.

*Subject: Archaeological Resources Assessment for the 2159 Bay Street Project, Los Angeles,
California*

ATTACHMENT D

Non-Confidential NAHC SLF Results

