

**Addendum to the  
Berth 240 Transportation Vessels Manufacturing  
Facility Project  
Final Initial Study and Mitigated Negative  
Declaration**  
APP No. 170117-008

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**SCH No. 2017121023**

**Prepared By:**

City of Los Angeles Harbor Department  
Environmental Management Division  
425 S. Palos Verdes Street  
San Pedro, CA 90731

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## 1. Introduction

In March 2018, the Los Angeles Harbor Department (LAHD) Board of Harbor Commissioners adopted the 2018 Final Initial Study/Mitigated Negative Declaration (IS/MND) for the Berth 240 Transportation Vessels Manufacturing Facility Project (Project) (SCH#2017121023). Pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et. seq.), this Addendum has been prepared to address proposed changes to the project to allow for the adaptive reuse and operation of five structures within the existing Bethlehem Shipyard Historic District on site. The 2018 Final IS/MND indicated that the site at Berth 240 would be used for new industrial manufacturing facilities to design, develop, and manufacture prototypes and first-generation models of specialized commercial transportation vessels. In 2020, the Applicant proposed the adaptive reuse of five of the existing historical buildings on site (Blacksmith and Anglesmith Shop, Transportation Shop [#4], Plate Shop [#6], Machine Shop and Warehouse Building [#7], and Shop #9). This Proposed Revised Project would include minor grading, paving, refurbishing, and adaptive reuse of five structures for office, manufacturing, and assembly use.

None of the other historic buildings and/or cranes on-site are proposed to be used as part of this project.

This Addendum was prepared pursuant to CEQA based on a revised Project description which includes the adaptive reuse of five historic buildings located on the previously approved project site. The lease area, as assessed in the previously certified CEQA document, has not changed and included 11 historic buildings and seven historic cranes. One of the requirements of the previous CEQA assessment was that the Applicant would be responsible for maintaining the historic buildings in compliance with the LAHD Built Environmental Historic, Architecture, and Cultural Resource Policy adopted by the Harbor Commissioners (Resolution 13-7479) in April 2013 and Lease Measure CUL – 1.

### **Lease Measure LM CUL-1:**

Once a proposed project structure is identified, the LAHD shall make a determination on whether a Historical Resource Assessment is necessary to determine the presence of a historical resource, as defined under CEQA. If such an assessment determines that a historic resource is present, the LAHD shall determine the need to implement measures that might include, but are not limited to, one or more of the following to further avoid, minimize, or substantially reduce the identified impacts:

1. A preservation architect meeting the Secretary of the Interior's Professional Qualifications Standards in historic architecture shall participate in preconstruction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources;

2. Complete photographic documentation of the historic resource prior to implementing the project. Such documentation shall adhere to standards and guidelines for Historical American Buildings Survey (HABS), Historic American Engineering Record (HAER), and Historic American Landscapes Survey (HALS) documentation, as outlined in the November 2011 HABS/HAER/HALS 31 Guidelines set by the Heritage Documentation Programs instituted by the National Park Service (<http://www.cr.nps.gov/hdp/standards/halsguidelines.htm>). At a minimum, the level of photographic documentation shall be at the HABS/HAER Level II; and/or,
3. For certain projects it may be necessary to establish an environmentally sensitive area and put up barriers to ensure the protection of specific built environment features, such as buildings, structures, and landscape and hardscape elements. The environmentally sensitive area shall be outlined on project plans and the construction crew must be made aware of restrictions and requirements for protecting historical resources for the duration of the project. A qualified professional meeting the Secretary of the Interior's Professional Qualifications Standards may be required to monitor the project to ensure adherence to restrictions.

Accordingly, this Addendum is being prepared pursuant to the requirements of CEQA Guidelines Section 15164. It confirms that no new significant impacts, no increases in severity of previously identified impacts, and no changes to previously-required mitigation measures would occur as a result of the Proposed Revised Project. All mitigation and lease measures are described in the Mitigation Monitoring and Reporting Program (MMRP) for the Project, provided in the 2018 Final IS/MND and referenced herein.

## **2. Background**

In March 2018, the LAHD Board of Harbor Commissioners adopted the Final IS/MND for the leasing of 18 acres at the former Bethlehem shipyard site for the construction of a new approximately 203,450-square-foot building (approximately 105 feet tall) and ancillary facilities, including a tank farm, parking, paving, and wharf repairs (see Figure 2.4-1, Proposed Project Site Plan, updated from the 2018 Final IS/MND). Facility operations would involve the research, design, and construction of vessels too large to be transported by road, and thus to be transported via water. The 2018 Final IS/MND also included relocation of existing Space Exploration Technologies' recovery operations that bring to shore returning space craft.

## **3. Proposed Revised Project**

This 2020 Addendum to the Berth 240 Transportation Vessels Manufacturing Facility 2018 Final IS/MND (Proposed Revised Project) proposes the adaptive reuse of five of the structures that contribute to the existing historic district on site (Blacksmith and Anglesmith Shop, Transportation Shop [#4], Plate Shop [#6], Machine Shop and Warehouse Building [#7], and Shop [#9]). The historic buildings would be used for various purposes. The Transportation Shop [#4] would house a substation to be used for electricity distribution to other buildings on-site, with connection to the grid via existing Los Angeles Department of Water and Power (LADWP) facilities adjacent to the site. The Blacksmith and Anglesmith Shop, and Plate Shop [#6], would be used for storage and inventory. The Shop [#9] would be used for barrel production and polishing, barrel stack integration, and desks and small part fabrication and integration. The Machine Shop and Warehouse Building [#7], would be used for stacking barrels, installing hardware on integrated sub-stacks, sub-assembly fabrication, and office use with desks and computers. The historical building locations are presented in Figure 2.4-1. All of the buildings proposed for adaptive reuse would require construction for building refurbishment and retrofitting up to California State Historical Building Code standards and in accordance with the Secretary of the Interior's Standards for Rehabilitation (36 CFR 67).

No changes to the previously-approved operations are proposed. The Proposed Revised Project proposes to include some of the activities within the historic district. As such, this Addendum addresses the additional construction activities necessary to restore the five existing structures.

Adaptive reuse would consist of general clean-up and utility hook-ups to the five buildings during the demolition and construction phase (listed below). The remainder of the modifications would occur in parallel with the building construction, paving, and architectural coating phases. Modifications would consist of the following:

- Clean (all five buildings)
- Replace broken windows, interior fixtures (all five buildings)
- Where applicable, paint interior and exterior surfaces; replace severely corroded siding(all five buildings)

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- Install doors on the open sides of the buildings (Blacksmith and Anglesmith Shop, Plate Shop Building [#6], and Shop #9)
- Refurbish floors (Blacksmith and Anglesmith Shop, and Plate Shop Building [#6])
- Upgrade power, lighting, plumbing, network, safety items, etc. (Machine Shop and Warehouse Building, Building #7, and Shop #9)
- Install doors on the ends of the building (Shop #9)
- Construct offices on mezzanine (Shop #9)
- Refurbish crane, replace cabling, hoist motors, etc. as needed; target changes to base structure, rails, or columns (Machine Shop and Warehouse Building, and Shop [#9])
- Repair freight elevator (Machine Shop and Warehouse Building, and Shop [#9])
- Re-activate 30T crane or install new (Machine Shop and Warehouse Building [#7])
- Cut 40-foot-wide by 45-foot-tall door on the east and west ends (Machine Shop and Warehouse Building [#7])
- Remove mezzanine to clear more area under high bay (Machine Shop and Warehouse Building [#7])



#### **4. Purpose**

This Addendum has been prepared in accordance with the requirements of CEQA (PRC 21000 et seq.) and the State CEQA Guidelines (California Code of Regulation Title 14, Section 15000 et seq.) and focuses on changes to the original project description and any impacts that would occur as a result of the Proposed Revised Project. The scope of analysis contained within this Addendum addresses all environmental resource areas. All previously identified mitigation measures for the Final IS/MND will be incorporated into the Proposed Revocable Permit. There are no new significant environmental effects and no substantial increase in the severity of previously identified significant effects as a result of the Proposed Revised Project. There are no known mitigation measures or alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment previously identified in the Final IS/MND. Similarly, there are no known mitigation measures or alternatives that are considerably different than those required by the adopted Final IS/MND that would substantially reduce one or more significant effects on the environment identified in the adopted Final IS/MND. Therefore, an Addendum to the Final IS/MND is appropriate (Section 15164).

An Addendum need not be circulated for public review, but can be included in or attached to the adopted Final IS/MND. The decision-making body would consider the Addendum prior to making a decision on the Proposed Revised Project, along with the previously adopted MND.

The following describes the requirements of an addendum, as defined by CEQA Guidelines Section 15164:

- a. The lead agency or responsible agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent EIR have occurred.
- b. An Addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- c. An Addendum need not be circulated for public review but can be included in or attached to the Final EIR.
- d. The decision-making body shall consider the Addendum with the Final EIR prior to making a decision on the project.
- e. A brief explanation of the decision not to prepare a Subsequent EIR pursuant to Section 15162 should be included in an Addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

## **5. Scope and Content**

This Addendum describes all CEQA environmental resource areas and evaluates potential changes to the impacts previously analyzed in the 2018 Final IS/MND with respect to the changes to the approved Project. No changes to operations are proposed; therefore, impacts evaluated herein address construction activities and conformity requirements for restoration of historic buildings.

The criteria for determining whether environmental effects would be significant in this analysis are the same CEQA significance thresholds contained within the adopted Final IS/MND.

The analysis in this Addendum focuses on the changes to the impacts that would occur as a result of the Proposed Revised Project. The following resource topics were evaluated in the Final IS/MND. As such, the following resources areas have been re-evaluated as part of this Addendum:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

An updated Air Quality, Greenhouse Gas Emissions, and Energy Analysis Technical Memorandum for the Transportation Vessels Manufacturing Facility Project (Dudek 2020), has been prepared. In support of the Cultural Resources evaluation, an updated Historical Resources Impacts Assessment for The Transportation Vessels Manufacturing Facility Project (February 2020) is provided as Appendix A to this Addendum.

The following resource topic areas were recently added to the CEQA Guidelines Checklist and, therefore, were not evaluated in the Final IS/MND. They have been evaluated as part of this Addendum:

- Energy
- Wildfire

## **6. Previous Environmental Documents Incorporated by Reference**

Consistent with Section 15150 of the State CEQA Guidelines, the following documents, available for review at the Port of Los Angeles Environmental Management Division, were used in preparation of this Addendum and are incorporated herein by reference:

- Port of Los Angeles. 2018, February. Berth 240 Transportation Vessels Manufacturing Facility Project Final IS/MND (SCH No. 2017121023)

## **7. Required Permits and Approvals**

The following permits and approvals would be required for the Proposed Revised Project:

- LAHD Coastal Development Permit (Revised)
- LAHD Engineering Permit
- City of Los Angeles Building Permit
- City of Los Angeles Electrical Permit
- City of Los Angeles Grading Permit
- RWQCB SWPPP
- RWQCB National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities
- SCAQMD
- LAHD Lease
- Department of Toxic Substances Control (DTSC)
- Environmental Protection Agency (EPA)

## **8. Environmental Analysis**

The analysis contained herein demonstrates and provides substantial evidence that no significant impacts would result from nor would the severity of other impacts be increased, by the Proposed Revised Project. Below is a discussion of all resource areas analyzed in the 2018 Final IS/MND and a discussion of why the impact determinations made then are not affected by the Proposed Revised Project.

### **8.1 Aesthetics**

Five of the “abandoned industrial buildings” referenced in the 2018 Final IS/MND are the buildings proposed for restoration in the Proposed Revised Project. The Proposed Revised Project would not construct additional new buildings or structures than that described in the 2018 Final IS/MND, nor would it expand the structures proposed for reuse. The Proposed Revised Project would use existing structures on site that were previously evaluated as historic structures within a historic in the 2018 Final IS/MND analysis. The proposed use of these buildings would potentially improve the visual character and quality of the site because the buildings would be properly maintained during project operations. The proposed changes do not include installation of significant areas of glass or other reflective materials. Lighting fixtures would be required to be consistent with the existing lighting fixtures or as otherwise proposed in the 2018 Final IS/MND. Therefore, no new source of shade would adversely affect daytime views in the area. There are no new negative aesthetic and visual character quality changes proposed for the site. The Proposed Revised Project would not cause any change to the impact determination made in the 2018 Final IS/MND.

### **8.2 Agriculture and Forestry Resources**

The Proposed Revised Project would not have any impact on agriculture and forestry resources, since the Project site is not located in any area zoned for agricultural use and would not change the existing use of the surrounding area in any way or beyond what was previously analyzed in the 2018 Final IS/MND.

### **8.3 Air Quality**

The Proposed Revised Project would involve the same construction as described in the 2018 Final IS/MND, with the addition of construction activities associated with adaptive reuse of five existing historic structures and the installation of an electrical substation for electrical utility hookups. Emissions from these additional construction activities are presented in Table 1 below. Additional construction activities would overlap with demolition and building construction activities identified in the 2018 Final IS/MND. The additional construction activities associated with restoring the buildings are not expected to create air quality impacts greater than what was previously evaluated in the 2018 Final IS/MND because the busiest previous construction task as analyzed in the document has not changed and does not overlap with the new construction tasks.

**Table 1 Estimated Maximum Daily Construction Criteria Air Pollutant Emissions – Associated with New Construction Tasks Only**

| Additional Construction Tasks                     | VOC            | NO <sub>x</sub> | CO           | SO <sub>x</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
|---|----------------|-----------------|--------------|-----------------|------------------|-------------------|
|   | Pounds per day |                 |              |                 |                  |                   |
| Install Substation                                | 0.65           | 3.11            | 15.71        | 0.03            | 0.90             | 0.74              |
| Renovation  | 3.95           | 39.00           | 18.58        | 0.04            | 2.14             | 1.88              |
| Renovation-Installation                           | 4.29           | 37.32           | 34.24        | 0.07            | 3.80             | 2.25              |
| <b>Maximum Daily</b>                              | <b>4.29</b>    | <b>39.00</b>    | <b>34.24</b> | <b>0.07</b>     | <b>3.80</b>      | <b>2.25</b>       |
| SCAQMD Maximum Daily CEQA Construction Thresholds | 75             | 100             | 550          | 150             | 150              | 150               |

**Source:** Dudek 2020.

**Notes:** These tasks do not overlap with each other or with construction tasks previously analyzed. VOC = volatile organic compound; CO = carbon monoxide; NO<sub>x</sub> = oxides of nitrogen; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter.

The Proposed Revised Project would result in building occupancy sooner than the 2018 Final IS/MND as it would take less time to renovate the existing buildings than it would be to construct a new building. Therefore, there may be potential overlap of operational activities while construction is ongoing. However, the operational activities shown in the 2018 Final IS/MND represent full production worst case daily emissions once construction is completed and if all sources operated in the same day. It is very unlikely in reality that all operational sources operate in the same day. However, as an example, it is possible that once renovation is complete welding activities may occur at the same time construction is still ongoing. It is estimated that a maximum of 10% of the total operational workforce would be working during an overlap, or up to 75 employees. As the welding would be grid-powered there would be no other operational emissions during a potential overlap; however, to be conservative, it was assumed that up to 6,500 horsepower Tier 4 diesel generators would operate up to 24 hours per day to power equipment until the installation of a substation for electrical utility hookups allows for transmission of sufficient power to the site or completion of the construction tasks described in this Addendum. Table 2 presents a worst-case day with some construction activities overlapping with these operations.

**Table 2 Estimated Maximum Potential Daily Construction and Operational Criteria Air Pollutant Emissions**

| Activity   | VOC            | NO <sub>x</sub> | CO           | SO <sub>x</sub> | PM10       | PM2.5      |
|--|----------------|-----------------|--------------|-----------------|------------|------------|
|  | Pounds per day |                 |              |                 |            |            |
| Construction   | 32.7           | 19.4            | 22.5         | 0.04            | 1.20       | 0.98       |
| Operation  | 16.6           | 35.2            | 439.4        | 0.63            | 2.08       | 1.74       |
| <b>Total</b>   | <b>49.4</b>    | <b>54.6</b>     | <b>462.0</b> | <b>0.7</b>      | <b>3.3</b> | <b>2.7</b> |
| SCAQMD Maximum Daily CEQA Thresholds for Operational Emissions | 55             | 55              | 550          | 150             | 150        | 55         |

Source: 2018 Final IS/MND; Dudek 2020. Overlapping construction and operational impacts are not expected to occur, but have been analyzed to present a worst-case conservative estimate.

Notes: VOC = volatile organic compound; CO = carbon monoxide; NO<sub>x</sub> = oxides of nitrogen; SO<sub>x</sub> = sulfur oxides; PM10 = coarse particulate matter; PM2.5 = fine particulate matter.

The following mitigation measures and lease measures identified in the 2018 Final IS/MND shall be implemented:

**Mitigation Measure MM AQ-1 – Architectural Coatings**

The tenant shall exclusively use zero VOC architectural coatings.

**Lease Measure LM AQ-1 – VOC-Containing Material Usage**

The tenant shall limit usage to the equivalent of 7 gallons of VOC-containing materials per day and 7,700 square feet of pre-impregnated material per day.

**Lease Measure LM AQ-2 – Ridesharing**

The tenant shall ensure that a minimum of 10% of the workforce carpools.

**Lease Measure LM AQ-3 – Shore Power Tug Boats**

Tugboats shall meet U.S. Environmental Protection Agency (EPA) Tier 3 engine standards, or cleaner, at all times during operation.

**Lease Measure LM AQ-4. Off-Road Construction Equipment (except vessels, harbor craft, on-road trucks, and dredging equipment)**

All off-road construction equipment greater than 50 hp must meet EPA Tier IV emission standards, unless the contractor provides a written finding consistent with project contract or lease management requirements and obtains written approval from the Lead Agency that such equipment is unavailable.

**8.4 Biological Resources**

The restoration of five existing buildings within the previously analyzed lease would not result in any changes to biological resources compared to the previously approved Project. As such, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND.

The following mitigation measure identified in the 2018 Final IS/MND shall be implemented:

**Mitigation Measure MM-BIO-1**

Prior to ground-disturbing activities and/or vegetation removal, a qualified biologist shall conduct surveys for the presence of nesting birds protected under the Migratory Bird Treaty Act (MBTA) and/or the CDFG Code within areas of the proposed project site that contain potential nesting bird habitat. Surveys shall be conducted 24 hours prior to the clearing, removal, or grubbing of any vegetation or ground disturbance. If active nests are located, then a barrier installed at a 50-foot radius from the nest(s) will be established and the tree/location containing the nest will be marked and will remain in place and undisturbed until a qualified biologist performs a survey to determine that the young have fledged or the nest is no longer active.

**Timing:** Throughout the construction, prior to vegetation removal.

**Methods:** Tenant shall include MM-BIO-1 in the contract specifications for all construction. Construction bid and contract specifications shall include the use of qualified avian biologists to evaluate and survey the Site to identify presence of nesting birds and/or active nests. Tenant shall monitor implementation of mitigation measures during construction or prior to vegetation removal. Tenant shall supply written documentation to demonstrate compliance.

**8.5 Cultural Resources**

The Proposed Revised Project would involve the same new building and demolition of non-contributing elements within the Bethlehem Historic District described in the 2018 Final IS/MND. The previous document analyzed an 18-acre lease area which included a historic district. The previous document did not allow for the use of the buildings, but did require the tenant to maintain them in accordance with the Port's Historic Resources Policy (2013). The current project includes use of the buildings and, as such, proposed building renovations have been evaluated for conformance with the Secretary of the Interior Standards and potential for impacts to the historic



district as a resource (See Appendix A to this Addendum). Because the renovations would honor the prior use by maintaining the utilitarian vessel production use, use in-kind materials, provide for clear but in-keeping repairs (broken window panes replaced, rusted metal replaced, etc.) and improvements, and would not involve additions or changes to the utilitarian look or purpose of the structures, the adaptive reuse would not result in significant impacts to the historic district.

Furthermore, any modifications to the buildings identified in Figure 2.4-1 would follow the standards adopted by the Secretary of the Interior in Standards for the Treatment of Historic Properties in accordance with LM CUL-1 and require written approval by the Harbor Department. Therefore, the Proposed Revised Project would not cause any change in impact determination from the 2018 Final IS/MND.

The following mitigation measures and lease measures identified in the 2018 Final IS/MND shall be implemented:

**Mitigation Measure MM CULT-1 Unanticipated Discovery of Archaeological Resources Condition**

In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); California Public Resources Code, PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

**Lease Measure LM CUL-1:**

Once a proposed project structure is identified, the LAHD shall make a determination on whether a Historical Resource Assessment is necessary to determine the presence of a historical resource, as defined under CEQA. If such an assessment determines that a historic resource is present, the LAHD shall determine the need to implement measures that might include, but are not limited to, one or more of the following to further avoid, minimize, or substantially reduce the identified impacts:

1. A preservation architect meeting the Secretary of the Interior's Professional Qualifications Standards in historic architecture shall participate in preconstruction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources;

2. Complete photographic documentation of the historic resource prior to implementing the project. Such documentation shall adhere to standards and guidelines for Historical American Buildings Survey (HABS), Historic American Engineering Record (HAER), and Historic American Landscapes Survey (HALS) documentation, as outlined in the November 2011 HABS/HAER/HALS 31 Guidelines set by the Heritage Documentation Programs instituted by the National Park Service (<http://www.cr.nps.gov/hdp/standards/halsguidelines.htm>). At a minimum, the level of photographic documentation shall be at the HABS/HAER Level II; and/or,
3. For certain projects it may be necessary to establish an environmentally sensitive area and put up barriers to ensure the protection of specific built environment features, such as buildings, structures, and landscape and hardscape elements. The environmentally sensitive area shall be outlined on project plans and the construction crew must be made aware of restrictions and requirements for protecting historical resources for the duration of the project. A qualified professional meeting the Secretary of the Interior's Professional Qualifications Standards may be required to monitor the project to ensure adherence to restrictions.

## **8.6 Energy**

While not evaluated in the 2018 Final IS/MND, the Proposed Revised Project, inclusive of the original Project, is not anticipated to result in wasteful, inefficient, or unnecessary consumption of energy resources, nor would it conflict with or obstruct a state or local plan for renewable energy or energy efficiency (Dudek 2020). Operational energy consumption is summarized here.

### **Electricity**

Operational uses of electricity may include, but are not limited to, building heating and cooling, lighting, appliances, and electronics. The project is expected to have a total electrical demand of 10,500,100 kilowatt-hours per year (or 10.5 gigawatt-hours ((GWh)) per year). The demand in 2018 was 68,486 GWh for Los Angeles County (CEC 2018). The project would be built in accordance with the current Title 24 standards at the time of construction and CALGreen. Therefore, due to the limited amount of electricity use compared to that generated and the inherent increase in efficiency of building code regulations, the project would not result in a wasteful use of energy.

### **Natural Gas**

Nature gas consumption during operations would be required for various purposes including, but not limited to: building heating and cooling and use within the kilns. The project would consume approximately 39,989,400 thousand British thermal units (kBtu) per year. Natural gas consumption in Los Angeles County in 2018 was 292 billion kBtu (CEC 2018).

**Petroleum Fuels**

The fuel consumption resulting from the project’s operational phase would primarily result from employees and visitors driving to and from the site. Annual fuel consumption is expected to be approximately 232,115 gallons of gasoline per year and 16,227.85 gallons of diesel per year. This assumes that 92% of the vehicles driven are gasoline powered. By comparison, California as a whole consumes approximately 19.3 billion gallons of petroleum per year (CEC 2016b). Therefore, estimated petroleum consumption is a small fraction of the overall statewide usage.

**Table 3 – Estimated Project Energy Use**

| <b>Energy Type</b>               | <b>Estimated Use</b>  |
|----------------------------------|---|
| <b>CONSTRUCTION</b>              |   |
| Diesel                           | 186,045.22 gallons  |
| Gasoline                         | 46,670.39 gallons   |
| Construction Total Petroleum Use | 232,715.61 gallons  |
| <b>OPERATION</b>                 |   |
| Gasoline                         | 232,115.45 gallons  |
| Diesel                           | 16,227.85 gallons   |
| Natural Gas                      | 39,989,400 thousand British thermal units (kBtu) per year                   |
| Electricity                      | 10,500,100 kilowatt-hours per year (or 10.5 gigawatt-hours ((GWh)) per year |

Source: Dudek 2020

The Project and Proposed Revised Project would not conflict with or obstruct renewable energy plans, since it would tie into the City of Los Angeles’s grid and not inhibit the utility from realizing the regional portfolio standards or other applicable regulations. The additional construction activities and utility hook-ups necessary to use the existing buildings would apply best management practices and comply with all applicable energy regulations and standards, and would result in a nominal increase in energy demand. Therefore, the Proposed Revised Project would have a less-than-significant impact related to energy.

### **8.7 Geology and Soils**

The Proposed Revised Project would not result in exposure of people or structures to substantial adverse effects, substantial soil erosion, or loss of topsoil, or be located on a geological unit that is unstable or would become unstable. The adaptive reuse of five existing buildings within the previously analyzed lease would not result in any changes to geological resources compared to the previously approved Project. As such, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND.

### **8.8 Greenhouse Gas Emissions**

The Proposed Revised Project would not construct any new buildings or expand existing buildings. The proposed reuse of the buildings would require retrofitting and installation of interior improvements structures to prepare the buildings for operation. The proposed additional construction and utility hook ups would not result in increased severity of greenhouse gas emissions compared to what was previously analyzed in the 2018 Final IS/MND. A summary of estimated annual construction emissions of greenhouse gases with the inclusion of the proposed project has been prepared (Dudek 2020). The Proposed Revised Project would be compliance with all applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gases. As such, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND.

### **8.9 Hazards and Hazardous Materials**

The Proposed Revised Project would not cause any change in requirements established in the 2018 Final IS/MND. The adaptive reuse of existing structures would not include excavation of those buildings. As such, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND related to hazards. Further, per the pending Land Use Covenant, the site is only available for commercial or industrial use only.

The following lease measures identified in the 2018 Final IS/MND shall be implemented:

#### **Lease Measure LM HAZ-1. Site Remediation Lease Requirement**

Contamination associated with building demolition (including, but not limited to asbestos containing materials, lead-based paint, PCB-containing light ballast, etc.) shall be the responsibility of the Tenant and/or the Tenant's contractors.

Unless otherwise authorized by the lead regulatory agency for any given site, the Tenant shall address all contaminated soils within proposed Project boundaries discovered during demolition, excavation, and grading activities. Any existing soil contamination discovered during development/construction shall be the responsibility of the property owner.

Management of the building waste shall occur in compliance with local, state, and federal regulations and as directed by the relevant lead regulatory agency. Any soil disturbance (including trenching, grading, or excavation) and/or remediation necessitated as a result of the demolition process shall be coordinated through the APP process and will require Harbor Department EMD consultation and oversight. Soil removal needed during demolition of the Compressor Building or redevelopment anywhere on the property, shall be completed as defined and established in the DTSC and USEPA-approved Southwest Marine Final Soil Management Plan Revised, Post Grading Update (Apex, July 2018). All imported soil to be used as backfill in excavated areas shall be sampled to ensure that it is suitable for use as backfill and that the soil meets the requirements of the Harbor Department's Import Fill Standards (LAHD, 2016).

### **8.10 Hydrology and Water Quality**

The Proposed Revised Project would not alter the amount of impervious surfaces because the Proposed Revised Project would reuse structures that, although abandoned, are already fully developed. The adaptive reuse of five existing buildings within the previously analyzed lease would not result in any changes to hydrological or water quality conditions compared to the previously approved Project. As such, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND.

### **8.11 Land Use and Planning**

The adaptive reuse of five existing buildings within the previously analyzed lease would not result in any changes to land use and planning compared to the previously approved Project. As such, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND related to land use.

### **8.12 Mineral Resources**

The adaptive reuse of five existing buildings within the previously analyzed lease would not result in any changes to mineral resources compared to the previously approved project. As such, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND.

### **8.13 Noise**

The Proposed Revised Project would result in additional construction noise generating activities. However, the additional equipment would not equate to a change in the noise levels experienced off site (a doubling of noise would be necessary to generate an audible, or 3 decibel [dB] increase in noise). Further, the Proposed Revised Project would not add construction activities to the peak construction activity phases evaluated in the 2018 Final IS/MND (site preparation and grading). As such, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND.

#### **8.14 Population and Housing**

The Proposed Revised Project would not induce population growth, or displace existing housing or a substantial number of people. The buildings would not be reused for housing purposes. No additional employees are proposed as part of this project. Therefore, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND.

#### **8.15 Public Services**

The adaptive reuse of five existing buildings within the previously analyzed lease would not result in any changes to demands for public services compared to the previously approved project. As such, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND.

#### **8.16 Recreation**

The Proposed Revised Project would not increase demand on existing recreational facilities nor require the construction of new recreational facilities because the Proposed Revised Project would not directly or indirectly induce population growth. As such, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND.

#### **8.17 Transportation**

The restoration of five existing buildings within the previously analyzed lease would result in a nominal increase in construction workers. The peak construction activities of the Project would not overlap with the rehabilitation activities added under the Proposed Revised Project. As such, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND.

The following mitigation measure identified in the 2018 Final IS/MND shall be implemented:

#### **Mitigation Measure MM-TRA-1:**

As a condition of the lease and Coastal Development Permit, the Applicant shall be required to establish shift start and end times outside of peak hours as follows:

- A) Shift start times shall not fall between 7 a.m. to 10 a.m., to be outside of the a.m. peak hours; and
- B) Shift end and late shift start times shall not fall between 3 p.m. to 6 p.m., to be outside of the p.m. peak hours,

In the event that Caltrans and LADOT approves the restriping of the westbound leg of the intersection of Ferry Street at the SR-47 ramps from a left-turn and a right-turn under baseline conditions to a left-turn and shared left- and right-turn lane, the Tenant may have the restriction on shift start and end times lifted with the implementation of the intersection improvement as mitigation.

### **8.18 Tribal Cultural Resources**

The Proposed Revised Project would use historical buildings; however, these buildings are not significant to California Native American tribes. As such, the Proposed Revised Project would not cause any change in impact determinations from the 2018 Final IS/MND.

### **8.19 Utilities and Service Systems**

The adaptive reuse of the five buildings would not impact current wastewater treatment facilities, nor would it require the construction of an additional wastewater facilities. No new demands on water supply are anticipated. Additionally, minimal solid waste would be generated from the adaptive reuse of the five buildings.

### **8.20 Wildfire**

The Proposed Revised Project is located within the original Project boundary, and therefore the site-specific Project information analyzed in the 2018 Final IS/MND is applicable to the Proposed Revised Project. Neither the Proposed Revised Project site nor any of the other Port of Los Angeles property is located in or near a state responsibility area or lands classified as very high fire hazard severity zones (CAL FIRE 2013; Los Angeles Fire Department 2019). Therefore, the wildfire section of the CEQA Guidelines checklist does not apply. However, the Proposed Revised Project would not impair an adopted emergency response plan or emergency evacuation plan, or exacerbate wildfire risks. Therefore, the Proposed Revised Project would have no impact on wildfires.

## **9. Conclusions**

The Proposed Revised Project would add the adaptive reuse of structures that are contributing elements to the Bethlehem Historic District. No additional operations are proposed, but a reconfiguration of operations is proposed, and additional construction activities would be necessary to rehabilitate the structures for reuse and were evaluated herein. The adaptive reuse would be undertaken within the Standards for Rehabilitation, and would promote longevity of the structures and the Bethlehem Historic District.

None of the conditions as described under Section 15162 of the State CEQA Guidelines requiring a subsequent EIR or MND have occurred under the Proposed Revised Project. No substantial changes to impact areas previously analyzed in the 2018 Final IS/MND would occur as a result of the Proposed Revised Project. Furthermore, there are no known mitigation measures or Project alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment identified in the adopted 2018 Final IS/MND. For these reasons, the proposed reuse of the buildings would not create a potential adverse impact or substantial change to impact areas previously analyzed in the 2018 Final IS/MND.

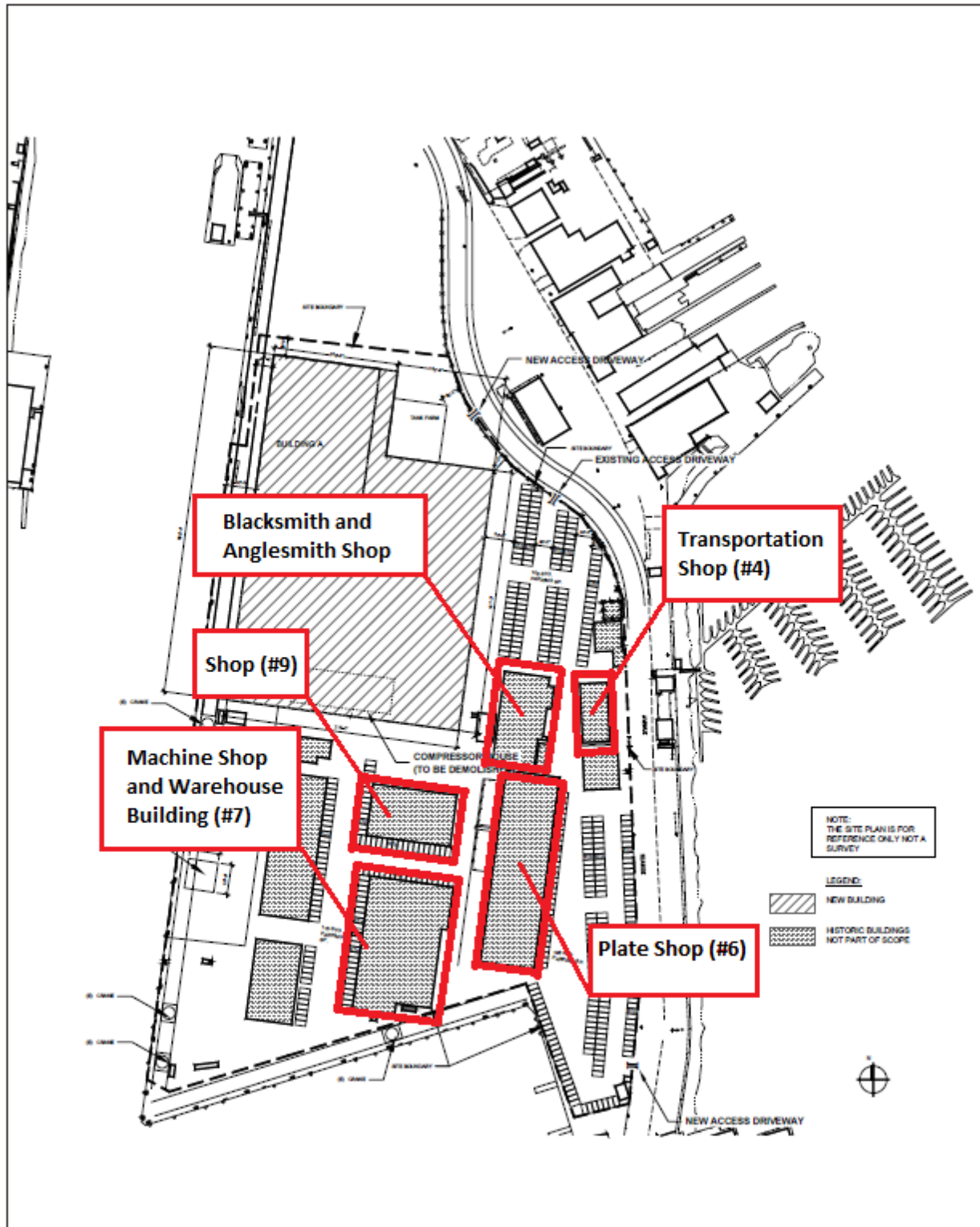
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**DUDEK** SOURCE: Mulder & Katkov Architecture (2017) **FIGURE 2.4-1**  
**Proposed Project Site Plan**  
Transportation Vessels Manufacturing Facility Project Draft IS/MND



**Appendix A –**  
**Adaptive Reuse Historical Resources Impacts**  
**Assessment for the Transportation Vessels**  
**Manufacturing Facility Project Port of Los Angeles,**  
**Berth 240**



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# Adaptive Reuse Historical Resources Impacts Assessment for the Transportation Vessels Manufacturing Facility Project Port of Los Angeles, Berth 240

*Prepared for:*

## **Los Angeles Harbor Department**

*Environmental Management Division  
425 South Palos Verdes Street  
San Pedro, California 90731*

*Prepared by:*

Samantha Murray, MA and Sarah Corder, MFA

**DUDEK**

38 North Marengo Avenue  
Pasadena, California 91101

**FEBRUARY 2020**

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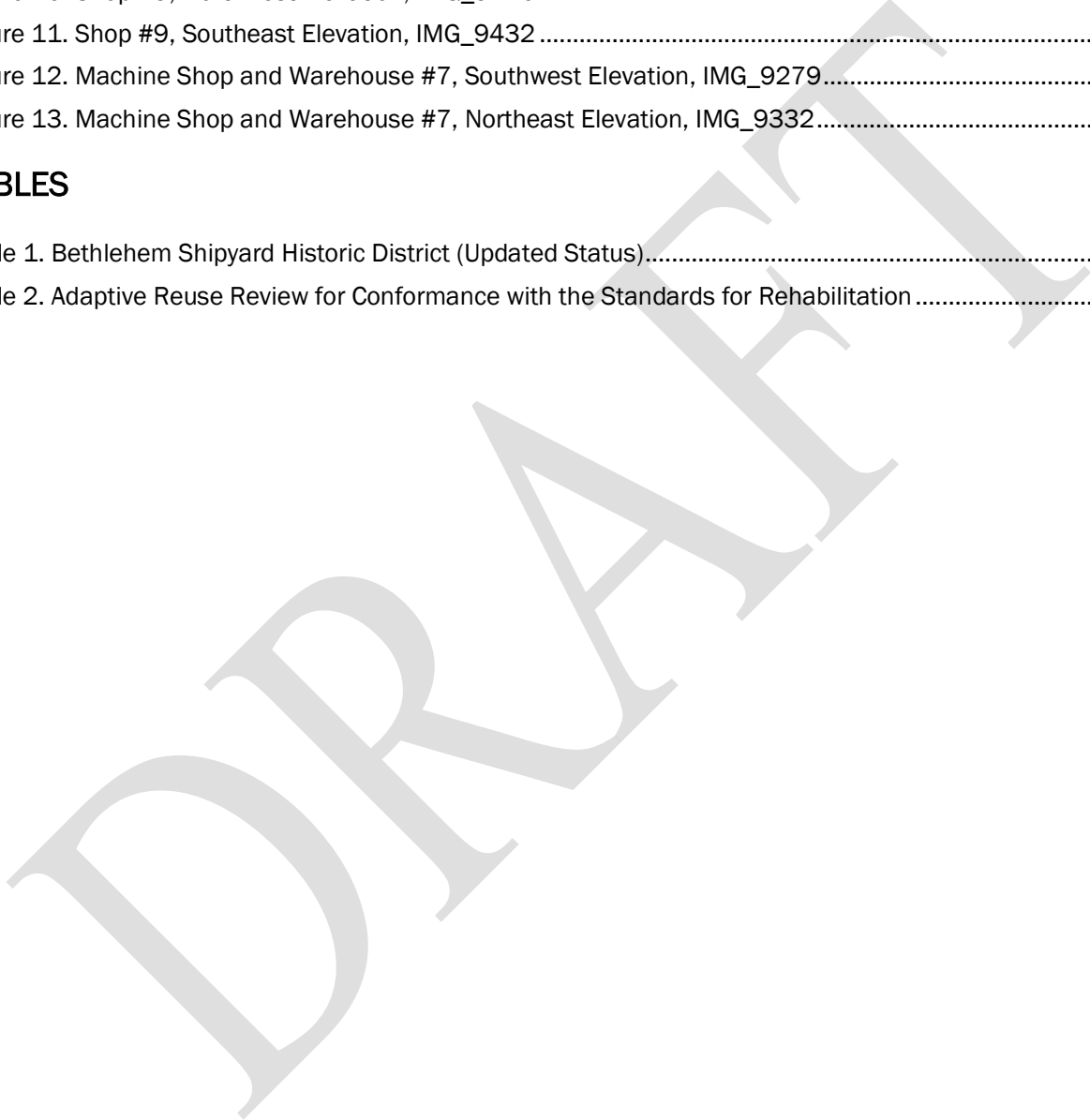
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# 1 Introduction

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Dudek prepared this Adaptive Reuse Historical Resources Impacts Assessment to assist the Los Angeles Harbor Department (LAHD) with California Environmental Quality Act (CEQA) compliance, with respect to historical resources. The purpose of this report is to assess the historical resources impacts of the project evaluated within the *Final Initial Study and Mitigated Negative Declaration Berth 240 Transportation Vessels Manufacturing Project* dated February 2018 (LAHD 2018), in consideration of a new project element that proposes adaptive reuse of five buildings within the existing Bethlehem Shipyard Historic District. This report analyzes the Project's potential to impact historical resources under CEQA, and assesses the project's conformance with the Secretary of the Interior's Standards for Rehabilitation.

## 1.1 Project Background

In March 2018, the LAHD Board of Harbor Commissioners adopted the Final IS/MND for the leasing of 18 acres at the former Bethlehem Shipyard site for the construction of a new approximately 203,450-square-foot prefabricated building (approximately 105 feet tall) and ancillary facilities, including a tank farm, parking, paving, and wharf repairs. Given the fact that the operations of the facilities would involve the research, design, and construction of vessels too large to be transported by road, the vessels will be transported via water. The 2018 Final IS/MND also included relocation of existing Space Exploration Technologies' recovery operations that are responsible for bringing returning space crafts to shore.

To support the 2018 MND, Dudek prepared a Historical Resources Technical Report for the proposed Transportation Vessels Manufacturing Facility Project (Dudek 2017). The technical report included the results of a records search, Native American tribal coordination, a pedestrian survey of the project site by qualified architectural historians, additional background research, an updated evaluation of the Bethlehem Shipyard Historic District, and a project-level impacts assessment.

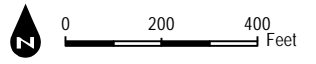
The project site falls within the Bethlehem Shipyard Historic District (Figure 1), which was previously found eligible for the National Register of Historic Places (NRHP). Because the previous district evaluation occurred more than 5 years ago (Murray et al. 2011), in accordance with LAHD historic built-environment policy, the evaluation was updated (Dudek 2017) to account for changes in condition/integrity. After conducting background research and a pedestrian survey of the proposed project site, the Bethlehem Shipyard Historic District appears to remain eligible for the NRHP (Criterion A), California Register of Historical Resources (CRHR, Criterion 1), and as a City of Los Angeles Historic-Cultural Monument (Criterion 1) for its important associations with the emergency shipbuilding program during World War II. The Compressor House building remains a non-contributor to the historic district due to its extensive alterations that occurred outside the district's period of significance. The Administration Building also continues to be a non-contributor due to its alteration of setting that visually removed it from the rest of the district. Altogether, the Bethlehem Shipyard Historic District comprises 20 elements consisting of 11 contributing buildings and 7 contributing cranes, with two non-contributing buildings (Table 1).

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- ▭ Historic District Boundary
- Site Boundary
- Building Footprint**
- Contributing
- Non-contributing



SOURCE: Bing Maps (Accessed 2016)

**FIGURE 1**

**Bethlehem Shipyard Historic District**

Transportation Vessels Manufacturing Facility Project, Port of Los Angeles, Berth 240

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**Table 1. Bethlehem Shipyard Historic District (Updated Status)**

| Building                                    | Year Built               | Status                    |
|---|--------------------------|---------------------------|
| Medical Building (No. 8)                    | 1941; altered 1943       | Contributor               |
| Foreman’s Building (No. 34)                 | 1941                     | Contributor               |
| Transportation Shop (No. 4)                 | 1941                     | Contributor               |
| Blacksmith and Anglesmith Shop              | 1918; altered 1941       | Contributor               |
| Plate Shop (No. 6)                          | 1918; altered 1941       | Contributor               |
| Machine Shop (No. 3)                        | 1941                     | Contributor               |
| Machine Shop and Warehouse Building (No. 7) | 1941; altered 1943       | Contributor               |
| Shop (No. 9)                                | 1941                     | Contributor               |
| Employees’ Building                         | 1941                     | Contributor               |
| Paint Shop and Substation                   | Circa 1940               | Contributor               |
| Substation No. 7                            | 1918; altered 1941       | Contributor               |
| Compressor House                            | 1918; altered 1941, 1960 | Non-contributor           |
| Administration Building                     | 1941                     | Non-contributor           |
| Cranes                                      | Circa 1918–1970          | 7 Contributors (pre-1946) |
| Guard House                                 | Circa 1950s              | No longer extant          |
| Building No. 22                             | 1941                     | No longer extant          |
| Dock Control House (No. 29)                 | Circa 1950s; moved 1960s | No longer extant          |
| Dry Dock No. 1                              | 1913                     | No longer extant          |
| Dry Dock No. 2                              | 1919                     | No longer extant          |
| Substation No. 3                            | 1918; moved 1941         | No longer extant          |

**Source:** Modified from Jones & Stokes 2000.

The project-level impacts assessment found that the proposed project would have a less-than-significant impact on historical resources under CEQA, but provided recommendations for final design schematic review (to ensure conformance with the Secretary of the Interior’s Standards for Rehabilitation) and for development of a detailed protection plan for the historic district during project construction activities and long-term maintenance of the district buildings. Although no archaeological resources or archaeological sensitivity was identified within the project site, standard protection measures for unanticipated discoveries were also provided.

## 1.2 Project Description and Location

### Project Description

This 2020 Addendum to the Berth 240 Transportation Vessels Manufacturing Facility 2018 Final IS/MND (Proposed Revised Project) proposes the adaptive reuse of five buildings that contribute to the existing Bethlehem Shipyard Historic District (Blacksmith and Anglesmith Shop, Transportation Shop #4, Plate Shop #6, Machine Shop and Warehouse Building #7, and Shop #9). The historic buildings would be used for various purposes. The Transportation Shop #4 would be used for electricity distribution. The Blacksmith and Anglesmith Shop, and Plate Shop #6, would be used for storage and inventory. The Shop #9 would be used for barrel production and polishing, barrel stack integration, small part fabrication and integration, and office use with desks and computers. The Machine Shop and Warehouse Building #7, would be used for stacking barrels, installing hardware on integrated sub-stacks, sub-assembly fabrication, and office use with desks and computers. All of the buildings proposed for adaptive reuse would require construction for building refurbishment and retrofitting to ensure compliance with the

California State Historical Building Code standards and in accordance with the Secretary of the Interior's Standards for Rehabilitation.

No changes in the operations of the original Project would result from the Proposed Revised Project; rather, a reconfiguration of how/where previously described operational activities would occur within the previously evaluated 18-acre lease area. As such, this Addendum addresses the additional activities during construction that are necessary to rehabilitate the five existing structures for adaptive reuse.

Adaptive reuse would consist of general clean-up and utility hook-ups to the five buildings (Blacksmith and Anglesmith Shop, Transportation Shop #4, Plate Shop #6, Machine Shop and Warehouse Building #7, and Shop #9) during the demolition and construction phase (listed below); the remainder of the modifications would occur in parallel with the building construction, paving, and architectural coating phases. Modifications would consist of the following:

- Clean (all five buildings)
- Replace broken windows, interior fixtures (all five buildings)
- Paint interior and exterior surfaces; replace severely corroded siding (all five buildings)
- Enclose open sides of buildings (Blacksmith and Anglesmith Shop, and Plate Shop Building #6)
- Refurbish floors (Blacksmith and Anglesmith Shop, and Plate Shop Building #6)
- Power, lighting, plumbing, network, safety items, etc. (Shop #9)
- Cut new 40' x 45' door opening on the east and west elevations. This includes removing the main structural vertical column currently in the center of the existing door, may include removing some original windows on each elevation, adding a new header beam, and installing a new industrial door (Shop #9 and Machine and Warehouse Building #7)
- Netting /wind break material over the open sides of the metal awning structure (north elevation of Shop #9)
- Offices on mezzanine (Shop #9)
- Wire with 480v three-phase power to multiple locations along interior walls; install standard industrial lighting (Machine Shop and Warehouse Building, and Shop #9)
- Refurbish crane, replace cabling, hoist motors, etc. as needed; target changes to base structure, rails, or columns (Machine Shop and Warehouse Building, and Shop #9)
- Reactivate freight elevator (Machine Shop and Warehouse Building, and Shop #9)
- Reactivate 30T crane or install new (Machine Shop and Warehouse Building #7)
- Power, lighting, plumbing, network, safety items, etc. (Machine Shop and Warehouse Building #7)
- Tear down small portion of mezzanine to clear more area under high bay (Machine Shop and Warehouse Building #7)

### Project Location

The proposed project site is located at Berth 240, at 985 South Seaside Avenue on Terminal Island within the Port of Los Angeles (Figures 2 and 3). The proposed project site is bounded to the north and east by South Seaside Avenue and the Al Larson boatyard, to the south by the former Southwest Marine Shipyard, and to the west by the Port of Los Angeles main channel. Access to the proposed project site is provided via South Seaside Avenue, State Route 47, the Harbor Freeway (Interstate (I) 110), the Long Beach Freeway (I-710), and the San Diego Freeway (I-405). The project site falls within Township 5 South; Range 13 West; Section 20 of the U.S. Geological Survey 7.5-Minute San Pedro Quadrangle.

## 1.3 Project Personnel

This report, associated site visit, adaptive reuse conformance review, and impacts analysis was prepared by Dudek Senior Architectural Historians Samantha Murray, MA and Sarah Corder, MFA, who meet the Secretary of the Interior's Professional Qualification Standards for Architectural History and Historic Preservation (36 CFR 61).

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## 1.5 Regulatory Setting

### Federal

#### *National Register of Historic Places*

While there is no federal nexus for this project, the Bethlehem Shipyard Historic District appears eligible for NRHP. The NRHP is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service, under the U.S. Department of the Interior, the NRHP was authorized under the National Historic Preservation Act, as amended. Its listings encompass all National Historic Landmarks, as well as historic areas administered by the National Park Service.

NRHP guidelines for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. Its criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP. For a property to be listed in or determined eligible for listing, it must be demonstrated to possess integrity and to meet at least one of the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That 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. That have yielded, or may be likely to yield, information important in prehistory or history.

Integrity is defined in NRHP guidance, "How to Apply the National Register Criteria," as "the ability of a property to convey its significance. To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity" (NPS 1990). NRHP guidance further asserts that properties be completed at least 50 years ago to be considered for eligibility. Properties completed fewer than 50 years before evaluation must be proven to be "exceptionally important" (criteria consideration to be considered for listing).

### State

#### *California Register of Historical Resources*

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 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” (California Public Resources Code 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 NRHP, enumerated below. According to California Public Resources Code 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 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 below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- California Public Resources Code Section 21083.2(g) defines “unique archaeological resource.”
- California Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5(a) define “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 an historical resource.
- California Public Resources Code Section 21074(a) defines “tribal cultural resources.”
- California Public Resources Code 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.



- California Public Resources Code Sections 21083.2(b)-(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” (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(b).) If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code Section 5024.1(q)), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code 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 (California Public Resources Code 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); California Public Resources Code Section 5020.1(q)). In turn, CEQA Guidelines section 15064.5(b)(2) states the significance of an historical resource is materially impaired when a project:

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 of Historical Resources; 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 Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
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 of Historical Resources as determined by a lead agency for purposes of CEQA.

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 (California Public Resources Code Section 21083.2[a], [b], and [c]).

California Public Resources Code 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.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (California Public Resources Code section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)). However, if a non-unique archaeological resource qualifies as tribal cultural resource (California Public Resources Code Section 21074(c), 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 California Public Resources Code Section 5097.98.

#### ***Secretary of the Interior's Standards***

Where a project has been determined to conform with the Secretary of the Interior's Standards for the Treatment of Historic Properties, the project's impact on historical resources would be considered mitigated to below a level of significance and, thus, not significant (14 CCR 15126.4(b)(1)). In most cases, a project that demonstrates conformance with the Secretary of the Interior's Standards is categorically exempt from CEQA (14 CCR 15331), as described in the CEQA Guidelines:

Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Weeks and Grimmer 1995), the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant (14 CCR 15126.4(b)(1)).

The Secretary of the Interior's Standards are a series of concepts focused on maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. They function as common-sense historic preservation principles that promote historic preservation best practices. There are four distinct approaches that may be applied to the treatment of historical resources:

- Preservation focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time.
- Rehabilitation acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.



- Restoration depicts a property at a particular period of time in its history, while removing evidence of other periods.
- Reconstruction recreates vanished or non-surviving portions of a property for interpretive purposes.

The choice of treatment depends on a variety of factors, including the property's historical significance, physical condition, proposed use, and intended interpretation. Rehabilitation was determined to be the most appropriate treatment option for the proposed project because it allows for a compatible use for the property through repair, alterations, and additions while preserving those portions or features that convey its historical and architectural values.

The CEQA Guidelines provide general design and technical recommendations to assist in applying the Secretary of the Interior's Standards to a specific property. Together, the Secretary of the Interior's Standards and the CEQA Guidelines provide a framework that guides important decisions concerning proposed changes to a historic property.

### **Standards for Rehabilitation**

The Standards for Rehabilitation (below), taken together with the CEQA Guidelines, provide the framework in which project conceptual design plans were developed and associated recommendations were made.

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old

and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will 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.

## Local

### *Los Angeles Harbor Department*

#### **Built Environment Historic, Architectural, and Cultural Resource Policy**

This report was prepared in accordance with the LAHD's guide for the identification, evaluation, and appropriate treatment of historic buildings and structures owned by, or located on property under the possession, management, or control of, the LAHD. The introductory and relevant preservation portions of the policy are provided below (see LAHD 2013 for the full policy).

- I. GOAL: Encourage the preservation of the built historic, architectural and cultural resources within the Port of Los Angeles in a manner consistent with the City of Los Angeles Harbor Department's (Harbor Department) mission and obligations under the Tideland Trust Doctrine, Tideland Trust Grant, California Coastal Act, City of Los Angeles Charter, and the Port Master Plan.

## II. INTRODUCTION

- A. The purpose of this Built Environment Historic, Architectural and Cultural Resource Policy is to encourage and establish priorities for preservation and reuse of the historic, architectural and cultural heritage represented by the built environment, defined as buildings, structures, objects, districts and sites in the Port of Los Angeles.
- B. The Port has been integral to the development of the City of Los Angeles, California and the United States. This important historical role can be seen in the evolution of the Port's built environment as it has adapted over time to major events, technologies, social change and the changing patterns and processes of maritime business, commerce and trade. The built environment of the Port and its association with significant events, activities, developments, architectural history, and engineering achievements of the past provides an opportunity to appreciate and honor the historic role played by the Port.
- C. The City of Los Angeles Board of Harbor Commissioners (Board) recognizes historic, architectural and cultural resources of the built environment as an important part of our heritage and recognizes the value of historic preservation within the context of a modern-day industrial and commercial port operation.
- D. This policy provides a guide to Harbor Department staff and the public for the identification, evaluation and the appropriate treatment of historic buildings and structures owned by, or located on property under the possession, management or control of the Harbor Department.

- E. The Board directs the Executive Director, designee, to carry out this policy.

## V. PRESERVATION

A. The Harbor Department shall promote and establish priorities for the preservation and adaptive reuse, where feasible, of historic buildings, structures, objects and districts owned, or located on property owned, by the Harbor Department, consistent with the mandates imposed upon it by the Tideland Trust Doctrine, Tideland Trust Grant, California Coastal Act, City of Los Angeles Charter, the Port Master Plan, and laws of the United States and the State of California.

B. The Harbor Department shall also promote preservation and adaptive reuse of its historic resources through the Port of Los Angeles Real Estate Leasing Policy and through its issuance of Harbor Department General Engineering Permits.

C. Harbor Department staff shall consider historic resources during the earliest stages of project planning to determine the feasibility of reuse in its current capacity or its adaptive reuse while preserving its character defining features. This consideration will include direct and indirect effects upon the historic resource.

D. If historic resources are involved in any potential leasing transaction by the Harbor Department, the Executive Director shall direct that evaluation criteria related to preservation and adapted reuse of this historic resource be one of the criteria to evaluate the extent to which the proposed lease promotes and provides for an adaptive reuse of the building or structure and the preservation of character defining features of the historic resource. In all cases where historic resources are involved, preservation and adaptive reuse shall be encouraged.

E. The environmental review process for analysis of potential impacts to a building, structure or object shall include, but not be limited to, the following steps implemented by the Director of the Environmental Management Division in consultation with the Director of the Engineering Division:

1. If a building, structure, object or district is included on the Inventory, but not listed on a federal, state or local Register, Environmental Management Division shall reevaluate its status if the previous evaluation is greater than five years old.
2. If a building, structure, object or district is not included in the Inventory and is over 50-years of age the building or structure shall be evaluated to determine potentially eligible for listing in a Register.
3. If a building, structure object or district is less than 50-years of age, Harbor Department staff will determine whether its evaluation is warranted. Criteria to be considered regarding a decision to evaluate shall include, but not limited to:
  - a. The age of the buildings structures, object or district shall be one of the criteria in the determination, with older buildings, structures, objects and districts having a higher value in the consideration on whether to evaluate.
  - b. Innovation in engineering or architecture recognized through time as trend setting in national or regional periodicals and widely emulated.

c. If resource is the only one remaining having an important association with a historic person or event.

d. Whether or not the resource is an integral part of a district that is potentially eligible for listing on a Register.

4. Only after completion of environmental review (as applicable) will a General Engineering Permit, including those for demolition or substantial alternation, be issued.

F. Any alteration or changes to a building, structure, object and district identified as a historic resource shall be done, if practicable, in conformance with the Secretary of the Interior's Standards for Treatment of Historic Properties as determined the Executive Director or Board of Harbor Commissioners based on recommendations of a person or persons meeting the meeting the Secretary of the Interior Professional Qualification Standards (Appendix A, 36 CFR Part 61).

G. The Executive Director shall ensure that any historic building, structure, object or district owned by the Harbor Department shall be secured until such time as its ultimate disposition has been determined by the Harbor Department. Further, and if appropriate, the Executive Director may take additional steps to ensure that such building, structure, object or district is stabilized or maintained at a standard so as not to produce a detrimental effect upon its character.

H. In undertaking projects involving historic resources, the Harbor Department shall comply with all applicable laws, rules and regulations including but not limited to the California Environmental Quality Act. The Harbor Department staff shall consider the potential effects on historic resources as early in the environmental process as possible.

### ***City of 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.

For the purposes of SurveyLA, this definition has been broken down into three HCM designation criteria that closely parallel the existing NRHP and CRHR criteria:

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

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## 2 Methods

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### 2.1 Site Visit

On January 30, 2020, Dudek Senior Architectural Historians Samantha Murray, MA, and Sarah Corder, MFA met on-site with the Applicant to discuss proposed changes to five buildings within the project site as part of the proposed adaptive reuse; and take detailed photographs of all elements of the historic district, particularly those proposed for rehabilitation as part of the adaptive reuse. Photographs were taken to document existing conditions at the time of the updated impacts assessment and conformance review for the Standards for Rehabilitation, and to provide a base for associated adaptive reuse renderings.

Dudek documented the fieldwork using field notes, digital photography, close-scale field maps, and aerial photographs. Photographs of the project site were taken with a Canon Power Shot SD90 digital camera with 12 megapixels and 3x optical zoom. All field notes, photographs, and records related to the current study are on file at Dudek's Pasadena, California, office.

### 2.2 Review Project Rehabilitation Details

Where a project has been determined to conform with the Secretary of the Interior's Standards for the Treatment of Historic Properties, the project's impact on historical resources would be considered mitigated to below a level of significance and, thus, not significant (14 CCR 15126.4(b)(1)), as described in the CEQA Guidelines:

Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Weeks and Grimmer 2017), the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant (14 CCR 15126.4(b)(1)).

A qualified Dudek architectural historian reviewed and commented on the revised project description for the MND Addendum to ensure conformance with the Standards for Rehabilitation. This review included renderings of the proposed modifications to the five historic buildings based on photographs taken during the site visit (Appendix A).

### 2.3 Project Impacts Assessment

A qualified Dudek architectural historian completed a detailed impacts assessment in consideration of five contributing buildings within the Bethlehem Shipyard Historic District proposed for adaptive reuse as part of the proposed project. The impacts assessment incorporates a review of the proposed district-wide modifications in conformance with the Standards for Rehabilitation. 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" (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(b).)

## 3 Impacts Assessment

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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” (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(b).) 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); California Public Resources Code Section 5020.1(q)).

Pursuant to these sections, CEQA requires assessment of whether a project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired. The following sections provide a detailed assessment of potential project-related impacts with respect to the larger historic district and its individual elements. This section also includes a conformance review for the proposed adaptive reuse of contributing district buildings, in consideration of the Secretary of the Interior’s Standards for Rehabilitation.

### 3.1 Identified Historical Resource Impacts

The following buildings and site elements will be adaptively reused as part of the Proposed Revised Project. Each section below provides an overview of each building’s existing condition, a summary of all proposed improvements for each building, and a discussion of the potential impacts of these activities to historical resources.

#### 3.1.1 Transportation Shop #4

##### **Existing Conditions**

The Transportation Shop #4 building (Figures 4 and 5) was constructed in 1941 and is located near the eastern border of the district, adjacent to South Seaside Avenue. The building is rectangular in plan, with a 3-story section to the north and 1-story section that comprises the majority of the building. The first story of the building consists of concrete block walls with industrial steel-sash, multi-lite windows throughout all elevations. Many of the windows appear to have operable central awning openings. The west elevation features four open bays, and exhibits one infilled bay (date unknown). The flat-roofed, one-story section supports transformer equipment and is circumscribed by a chain-link fence. The 3-story section features a gabled roof and is clad in corrugated metal sheets on the roof and upper stories. This section also features various configurations of industrial steel-sash, multi-lite windows with operable awning openings. The north elevation features an exterior metal staircase that leads from the ground floor to an entrance on the second story.





Figure 4. Transportation Shop #4, Southwest Elevation, IMG\_7863

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Figure 5. Transportation Shop #4, Northeast Elevation, IMG\_9465

### Proposed Improvements

- Renovate interiors
- Clean exterior and interior surfaces
- Clean existing windows, and repair when feasible
- Replace broken windows in-kind, with compatible glass industrial steel-sash replacements
- Paint interior and exterior surfaces
- Replace broken exterior lighting with compatible, industrial replacements
- Add utility hook-ups
- If feasible, replace/upgrade existing electrical equipment on roof

### Potential to Impact

*Less than significant.* The Proposed Revised Project will adaptively reuse Transportation Shop #4 for electricity distribution. The building's major character-defining features (CDFs) that help it to convey its historic function include industrial building materials that include metal and concrete; industrial steel sash multi-lite windows; original fenestration; and its roof-top electrical equipment. The Project will either retain, repair, or replace in-kind any original exterior materials on the building. Corrugated metal siding and windows will be cleaned using the

gentlest means possible. Windows will be repaired whenever feasible. Where repair is not possible, compatible glass and steel sash multi-lite replacements will be installed. Exterior paint choices will be sympathetic to the subdued, industrial setting of the larger historic district. The roof-top electrical equipment will be upgraded or replaced so that the building may take on a new, but similar function.

### 3.1.2 Blacksmith and Anglesmith Shop

#### Existing Conditions

The Blacksmith and Anglesmith Shop (Figures 6 and 7) was constructed in 1918, modified in 1941. The building is directly adjacent to the north of Plate Shop #6, and directly adjacent to the west of Foreman's Building #34. At approximately 2 ½ stories in height, the building features a gabled roof topped with a tubular vent running nearly the entire length of the building. The west elevation features a shed-roof extension that was once fully enclosed, but is now effectively a shell that is open on the north elevation. The east elevation features a shed-roof awning extension that shelters open bays and an enclosed, rectangular office space. Windows throughout the building consist of industrial steel-sash, multi-lite windows



Figure 6. Blacksmith and Anglesmith Shop, Northeast Elevation, IMG\_9107





Figure 7. Blacksmith and Anglesmith Shop, Northwest Elevation, IMG\_9131

### Proposed Improvements

- Renovate interiors: refurbish floors
- Clean exterior and interior surfaces
- Clean existing windows, and repair when feasible
- Replace broken windows in-kind, with compatible glass and industrial steel-sash replacements
- Replace severely corroded siding in-kind with appropriate replacement metal siding of the same thickness and general appearance
- Paint exterior walls
- Replace broken exterior lighting with compatible, industrial replacements
- Add utility hook-ups
- Enclose open portions of the buildings with compatible new materials.

### Potential to Impact

*Less than significant.* The Proposed Revised Project will adaptively reuse the Blacksmith and Anglesmith Shop for storage and inventory purposes. The building's major CDFs include its large, boxy scale and massing; dominant

exterior material (corrugated metal); and industrial steel sash multi-lite windows. The Project will either retain, repair, or replace in-kind any original exterior materials on the building. Corrugated metal siding will be cleaned, and if necessary, replaced in-kind with a compatible corrugated metal that is similar in appearance to the existing metal. Windows will be cleaned using the gentlest means possible and repaired whenever feasible. Where repair is not possible, compatible glass and steel sash, multi-lite replacements will be installed. Exterior paint choices will be sympathetic to the subdued, industrial setting of the larger historic district.

The most significant alteration proposed to this building is the re-enclosure of the north, south, and east elevations. Currently, the Blacksmith/Anglesmith Shop is completely open on the north and south elevations and partially open on the east elevation. Re-enclosure of the north and south elevations will entail construction of new wall framing and installation of new exterior sheet metal panels (with a similar appearance) from the bottom of the second story to the ground floor and installation of compatible industrial metal entry and roll-up doors. Enclosure of the east elevation will entail removal of the existing corrugated metal awning below the existing second-story windows, installation of new wall framing, installation of new exterior sheet metal panels (with a similar appearance) from the bottom of the second-story windows to the ground floor, and installation of a new row of compatible industrial glass and steel-sash multi-lite windows similar in appearance to the existing industrial windows. The resulting appearance would be a more flush east elevation clad in compatible new materials, however, the overall massing and scale of the building would not change, and original materials would be either retained, repaired, or replaced in-kind.

### 3.1.3 Plate Shop #6

#### **Existing Conditions**

Plate Shop #6 (Figures 8 and 9) was constructed in 1918 and is located near the existing berth entrance on the east side of the historic district adjacent to South Seaside Avenue. The building is two-stories in height, rectangular in plan, with a wood-frame, and flat roof structure supported by a wood truss system. The second story is primarily clad in vertical board-and-batten siding, while the ground floor is primarily clad in corrugated metal siding. Windows throughout the building consist of various sized industrial steel-sash, multi-lite windows, some of which still have operable awning openings. The east elevation displays the name of the former tenant in blue paint ('Southwest Marine') over painted white vertical wood board-and-batten siding. The southernmost half of the east elevation is enclosed, while the northernmost half is exposed with no exterior walls. The west elevation features several openings which likely once had metal roll-up doors, and has been partially enclosed with newer corrugated metal siding (date unknown). The north elevation features an exterior metal staircase leading to a single entry door on the second story. The south elevation features numerous windows of varying size and a large opening which likely once had a metal roll-up door.



Figure 8. Plate Shop #6, Southeast Elevation, IMG\_9081

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Figure 9. Plate Shop #6, Southwest Elevation, IMG\_9377

#### Proposed Improvements

- Renovate interiors
- Clean exterior and interior walls surfaces
- Clean existing windows, and repair when feasible
- Replace broken windows in-kind, with compatible glass and industrial steel-sash replacements
- Replace severely corroded siding in-kind with appropriate replacement metal siding of the same thickness and general appearance
- Replace deteriorated or damaged timber in-kind, with compatible timber replacements, retaining as much as the original timber as feasible
- Paint exterior walls
- Enclose the open side of the building (east elevation)
- Replace broken exterior lighting with compatible, industrial replacements

### Potential to Impact

*Less than significant.* The Proposed Revised Project will adaptively reuse Plate Shop #6 for storage and inventory purposes. The building's major CDFs that help to convey its historic function include its large, boxy scale and massing; dominant exterior materials (corrugated metal and wood); industrial steel sash multi-lite windows; and its original fenestration. The Proposed Revised Project will either retain, repair, or replace in-kind any original exterior materials on the building. Corrugated metal siding will be cleaned, and if necessary, replaced in-kind with a compatible corrugated metal that is similar in appearance to the existing metal siding. Deteriorated timber will be replaced in-kind with a compatible wood that is similar in appearance to the existing timber. Windows will be cleaned using the gentlest means possible and repaired whenever feasible. Where repair is not possible, compatible glass and steel sash replacements will be installed. Exterior paint choices will be sympathetic to the subdued, industrial setting of the larger historic district.

The most significant alteration proposed to this building is the enclosure of the northern half of the east elevation. Currently, Plate Shop #6 is completely open on the northernmost half of the east elevation. Re-enclosure of this portion of the building will entail construction of new wall framing and installation of new exterior sheet metal panels (of the same appearance) from the bottom of the second story to the ground floor. No existing materials would require removal or replacement as part of the re-enclosure. The resulting appearance would be a more flush east elevation clad in compatible new materials, however, the overall massing and scale of the building would not change, and original materials (i.e., corrugated metal siding and timber exterior supports and cladding) would be either retained, repaired, or replaced in-kind.

### 3.1.4 Shop # 9

#### Existing Conditions

Machine Shop #9 (Figures 10 and 11) was constructed in 1941 and is located in the center of the historic district. The building is 2-stories in height with a gabled roof featuring a metal tubular vent, and is entirely clad in corrugated metal siding. The building is dominated by its uniform pattern of fenestration consisting of industrial steel-sash, multi-lite windows many of which still have operable awning openings. The north, west, and south elevations feature a single, large industrial opening with metal roll-up door. The west elevation also includes a single metal entry door. The north elevation features a large metal awning supported by seven steel posts that is slightly off-centered to the west.





Figure 10. Shop #9, Northwest Elevation, IMG\_9410

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Figure 11. Shop #9, Southeast Elevation, IMG\_9432

### Proposed Improvements

- Renovate interiors: create offices on mezzanine; wire with 480v three-phase power to multiple locations along interior walls; install standard industrial lighting; reactivate freight elevator; refurbish crane, replace cabling, hoist motors, etc. as needed, target changes to base structure, rails, or columns; and power, lighting, plumbing, network, safety items, etc.
- Clean exterior and interior surfaces
- Clean existing windows, and repair when feasible
- Replace broken windows in-kind, with compatible glass and industrial steel-sash replacements
- Replace severely corroded siding in-kind with appropriate replacement metal siding of the same thickness and general appearance
- Paint exterior walls
- Replace broken exterior lighting with compatible, industrial replacements
- Add netting /wind break material over the open sides of the metal awning structure (north elevation)
- Cut new 40' x 45' door opening centered on the east and west elevations. This includes removing the main structural vertical column currently in the center of the existing door, removing some original windows on each elevation, adding a new header beam, and installing a new industrial door.

### Potential to Impact

*Less than significant.* The Proposed Revised Project will adaptively reuse Shop #9 for barrel production and polishing, barrel stack integration, small part fabrication and integration, and office use with desks and computers. The building's major CDFs include its large, boxy scale and massing; dominant exterior material (corrugated metal); and industrial steel sash multi-lite windows. The Proposed Revised Project will either retain, repair, or replace in-kind any original exterior materials on the building. Corrugated metal siding will be cleaned, and if necessary, replaced in-kind with a compatible corrugated metal that is similar in appearance to the existing metal siding. Windows will be cleaned using the gentlest means possible and repaired whenever feasible. Where repair is not possible, compatible glass and steel sash multi-lite replacements will be installed. Exterior paint choices will be sympathetic to the subdued, industrial setting of the larger historic district. Netting/wind break material will be added to the open sides of the metal awning structure located against the building's north elevation. This material addition will be reversible if so desired in the future.

The most substantial change proposed as part of the adaptive reuse of Shop #9 is the installation of two new, large-scale openings on the building's east and west elevations. This would entail cutting a new 40' x 45' door opening centered on the east and west elevations. This includes removing the main structural vertical column currently in the center of the existing door, removing the original windows on each elevation, adding a new header beam, and installing a new industrial door that will be sympathetic in design to the overall building aesthetic. Shop #9's proposed new function requires that it accommodate large-scale industrial materials that cannot fit through the existing access points on the building. By creating a larger opening on the west elevation and a new opening on the east elevation (both measure 40- x 45'), the building would be able to accommodate larger materials, while still retaining its most important CDFs.

The west elevation currently has a standard industrial opening at its center. The proposed new opening would also be centered but would require removal of the existing opening and the surrounding original glass and steel-sash windows. The east elevation currently has no opening. The proposed new opening would be centered and would require removal of original glass and steel-sash windows. In consideration of the repetitive volumes of corrugated metal and industrial steel-sash windows present throughout the building and the larger district as a whole, the loss of a small grouping of windows on the less prominent/smaller elevations, and replacement of some of the original metal siding will not result in a significant impact to the building's integrity of materials and its ability to remain a district contributor, as the vast majority of the building would remain intact and sufficiently represented on the north and south elevations. Further, the modification of the east and west elevations to accommodate large industrial doors is in keeping with the historic industrial function of the building and would still allow for the building to convey its historical associations while adapting to a new industrial use.

## 3.1.5 Machine Shop and Warehouse #7

### Existing Conditions

Machine Shop and Warehouse #7 (Figures 12 and 13) was constructed c. 1941 and is one of the largest buildings in the district. The building is roughly rectangular in plan, five-stories in height, with a flat roof structure, and sheathed in corrugated metal siding. The building is dominated by its uniform pattern of fenestration consisting of industrial steel-sash, multi-lite windows many of which still have operable awning openings. The exception is three bands of replacement, horizontal aluminum sliding windows identified on the west elevation. The south elevation is characterized by irregular setbacks in which the easternmost portion of the building is recessed several feet from

the westernmost portion. A freight elevator shaft also projects several feet off the main volume of the south elevation and an exterior timber staircase provides access to a second-floor entrance. The west elevation features a similar timber staircase, several industrial roll-up doors and two entry doors, one of which is sheltered beneath a corrugated metal awning. The north elevation features a single large industrial opening adjacent to a standard entry door. The east elevation features a central exterior metal staircase, five bays with roll-up doors accessed via a concrete walkway sheltered beneath a corrugated metal awning, and is missing some of its metal siding near the northeast corner of the building.



Figure 12. Machine Shop and Warehouse #7, Southwest Elevation, IMG\_9279





Figure 13. Machine Shop and Warehouse #7, Northeast Elevation, IMG\_9332

### Proposed Improvements

- Renovate interiors: demolish small portion of mezzanine to clear more area under high bay; wire with 480v three-phase power to multiple locations along interior walls; install standard industrial lighting; re-active freight elevator; refurbish crane, replace cabling, hoist motors, etc. as needed, target changes to base structure, rails, or columns; and power, lighting, plumbing, network, safety items, etc.
- Clean exterior and interior surfaces
- Clean existing windows, and repair when feasible
- Replace broken windows in-kind, with compatible glass and industrial steel-sash replacements
- Replace severely corroded siding in-kind with appropriate replacement metal siding of the same thickness and general appearance
- Paint exterior walls
- Replace broken exterior lighting with compatible, industrial replacements
- Cut new 40' x 45' door opening on the east and west elevations (off-centered to the north). This includes removing the main structural vertical column currently in the center of the existing door, removing existing windows, adding a new header beam, and installing a new industrial door.

### Potential to Impact

*Less than significant.* The Proposed Revised Project will adaptively reuse Machine Shop and Warehouse Building #7 for stacking barrels, installing hardware on integrated sub-stacks, sub-assembly fabrication, and office use with desks and computers. The building's major CDFs include its large, boxy scale and massing; dominant exterior material (corrugated metal); and industrial steel sash multi-lite windows. The Proposed Revised Project will either retain, repair, or replace in-kind any original exterior materials on the building. Corrugated metal siding will be cleaned, and if necessary, replaced in-kind with a compatible corrugated metal that is similar in appearance to the existing metal siding. Windows will be cleaned using the gentlest means possible and repaired whenever feasible. Where repair is not possible, compatible glass and steel sash replacements will be installed. Exterior paint choices will be sympathetic to the subdued, industrial setting of the larger historic district.

The most substantial change proposed as part of the adaptive reuse of Machine Shop and Warehouse Building #7 is the installation of two new, large-scale openings on the building's east and west elevations. This would entail cutting a new 40' x 45' door opening on the east and west elevations (off-centered to the north on each elevation). This includes removing the main structural vertical column currently in the center of the existing door, removing two sets of original windows from the second and third floors of each elevation, adding a new header beam, and installing a new industrial door. Machine Shop and Warehouse Building #7's proposed new function requires that it accommodate large-scale industrial materials that cannot fit through the existing access points on the building. By creating a larger opening on the west elevation and a new opening on the east elevation (both measure 40- x 45'), the building would be able to accommodate larger materials, while still retaining its most important CDFs.

At the proposed locations of the new 40' x 45' opening, the west elevation currently has two standard industrial openings with roll-up doors flanked by single entry doors. The proposed new opening would require that the existing two industrial openings be replaced by a single, large opening. The east elevation currently has no opening in this location, however, some of the metal siding has already been removed in this location. The proposed new opening would require removal of several more corrugated metal sheet panels and likely the removal of two sets of original glass and steel-sash windows on the second and third floors. In consideration of the repetitive volumes of corrugated metal and industrial steel-sash windows present throughout the building and the larger district as a whole, the loss of a small grouping of windows on a relatively small section of the east and west elevation, and replacement of some of the original metal siding will not result in a significant impact to the building's integrity of materials and its ability to remain a district contributor, as the vast majority of the building would remain intact and sufficiently represented on all other elevations. Further, the modification of the east and west elevations to accommodate large industrial doors is in keeping with the historic industrial function of the building and would still allow for the building to convey its historical associations while adapting to a new industrial use.

## 3.1.6 District-Wide Improvements

### Proposed Improvements

In addition to the building-specific improvements described above, the Proposed Revised Project will also conduct routine maintenance and repair of the surrounding hardscape and landscape. This includes removal of weeds and other invasive vegetation growing in, around, and near the buildings; re-paving of the existing hardscape with new asphalt; and installation of exterior lighting and guardrails for safety.

**Potential to Impact**

*Less than Significant.* No impacts were identified associated with the removal of weeds and other invasive plant growth throughout the district. Re-paving of the asphalt within the district is acceptable, providing that consideration is given to the existing rails that run throughout the district. If there is potential to reactivate the Coby cranes and other equipment in the future, it will be necessary to keep the rails intact. However, if it is determined that certain rails no longer serve a function or are in disrepair, they may be paved over (which will essentially preserve them in place). The rail lines, while clearly important to the historic function of the district, have not been identified as contributing features of the historic district, likely because of various reconfigurations that have occurred to rails throughout the life of the site. Finally, installation of exterior lighting is acceptable, providing that fixtures are compatible with the industrial nature of the site and that new, large-scale lighting is not affixed to the contributing buildings. Likewise, the installation of metal or timber guardrails is also acceptable providing that materials are not affixed to the buildings and may be removed from the site in the future without impact.

## 3.2 Adaptive Reuse Conformance Review

### 3.2.1 Application of the Standards for Rehabilitation

Table 2 presents the findings of a review of the Proposed Revised Project components for conformance with the Standards for Rehabilitation in consideration of the five historic district contributors proposed for rehabilitation and adaptive reuse.

**Table 2. Adaptive Reuse Review for Conformance with the Standards for Rehabilitation**

| Standard  | Project in Conformance? | Analysis  |
|---|-------------------------|---|
| 1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships. | Yes                     | The adaptively reused buildings will be continue to support industrial functions including electricity distribution (Transportation Shop #4); storage and inventory (Blacksmith and Anglesmith Shop, and Plate Shop #6); barrel production and polishing, barrel stack integration, small part fabrication and integration, and office use with desks and computers (Shop #9); stacking barrels, installing hardware on integrated sub-stacks, sub-assembly fabrication, and office use with desks and computers (Machine Shop and Warehouse Building #7). These proposed uses will require minimal changes to the historic district’s materials, features, spaces, and spatial relationships. The buildings will remain in their current configuration within the larger district and will retain the vast majority of their original materials (i.e., corrugated metal, timber, concrete, and industrial glass and steel-sash windows). |
| 2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial                     | Yes                     | The historic character of the historic district will be retained and preserved. The buildings’ major CDFs including their large, boxy scale and massing; dominant exterior materials (i.e., corrugated metal, timber, and concrete); and industrial steel sash multi-lite windows. The Proposed Revised Project   |

**Table 2. Adaptive Reuse Review for Conformance with the Standards for Rehabilitation**

| Standard   | Project in Conformance? | Analysis   |
|--|-------------------------|--|
| relationships that characterize a property will be avoided.  |                         | will either retain, repair, or replace in-kind any original exterior materials on the building. Corrugated metal siding will be cleaned, and if necessary, replaced in-kind with a compatible corrugated metal that is similar in appearance to the existing metal siding. Windows will be cleaned using the gentlest means possible and repaired whenever feasible. Where repair is not possible, compatible glass and steel sash multi-lite replacements will be installed. No spatial relationships or paths of circulation between the district buildings will be modified as part of the Proposed Revised Project.                      |
| 3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.   | Yes                     | No changes will be made that create a false sense of historical development. Any original materials that cannot be retained and repaired will be replaced in-kind with compatible new materials. No conjectural features or elements will be added to the buildings. The proposed enclosure of Plate Shop #6 and the Blacksmith/Anglesmith Shop will utilize compatible materials (i.e., corrugated metal and timber) that are sympathetic to and appropriate for the historic district, but will also be clearly distinguished as new.  |
| 4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.   | Yes                     | The historic district buildings have been subject to various degrees of maintenance over the years and it is likely that not all exterior elements date the district's period of significance. However, any changes to the buildings found to have required historic significance in their own right will be retained and preserved.   |
| 5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.   | Yes                     | The buildings' distinctive industrial exterior materials include corrugated metal, timber, concrete, and numerous steel sash multi-lite windows, all of which help to convey the buildings' former industrial functions. The project will preserve as much of the original exterior materials as feasible, however, in instances in which metal or timber siding is extensively deteriorated or original windows are beyond repair, in-kind replacement may be necessary. Distinctive features on the exterior of the buildings that speak to their historic function (e.g., cranes and other equipment) will also be preserved/refurbished. |
| 6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by | Yes                     | The buildings' major CDFs include their large, boxy scale and massing; dominant exterior materials (e.g., corrugated metal, timber, concrete); and industrial steel sash multi-lite windows. The project will either retain, repair, or replace in-kind any original exterior materials and features that characterize the district's industrial history and functions. Corrugated metal siding will be cleaned, and if necessary, replaced in-kind with a compatible corrugated metal that is similar in appearance to the existing metal siding.   |



**Table 2. Adaptive Reuse Review for Conformance with the Standards for Rehabilitation**

| Standard  | Project in Conformance? | Analysis  |
|---|-------------------------|---|
| documentary and physical evidence.  |                         | Deteriorated timber will be replaced in-kind with a compatible wood that is similar in appearance to the existing timber. Windows will be cleaned using the gentlest means possible and repaired whenever feasible. Where repair is not possible, compatible glass and steel sash multi-lite replacements will be installed. Distinctive features on the exterior of the buildings that speak to their historic function (e.g., cranes and other equipment) will also be preserved and repaired. No missing features are proposed for replacement.  |
| 7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.  | Yes                     | Cleaning of exterior metal siding and rust abatement may require chemical or physical treatments. If required, cleaning will use the gentlest means possible and will not cause damage to historic materials.   |
| 8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.   | Yes                     | No archaeological resources have been identified within the project site.   |
| 9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment. | Yes                     | <p>New construction within the historic district includes: 1) enclosure of the north, south, and east elevations of the Blacksmith/Anglesmith Shop; 2) enclosure of the northern half of the east elevation of Plate Shop #6; 3) installation of 40' x 45' door openings on the east and west elevations of Shop #9; and 4) installation of 40' x 45' door openings on the east and west elevations of Machine Shop and Warehouse Building #7.</p> <p>The above-described new construction will not destroy historic materials, features, or spatial relationships that characterize the historic district. None of these proposed modifications would alter the buildings' original plan, massing, or scale, nor would they detract from the significance of the buildings. Original materials will be retained and repaired whenever feasible. Any damaged/corroded materials deemed to be beyond repair would be replaced in-kind. Replaced, new materials would be clearly differentiated as new, but will also be fully compatible with the industrial nature of the district and in consideration of its simple, dominant exterior materials.</p> <p>Re-enclosure of the Blacksmith/Anglesmith Shop would remove very little original material from the building, rather, it would enclose open sides with district-appropriate corrugated metal and industrial windows, to allow the</p> |

**Table 2. Adaptive Reuse Review for Conformance with the Standards for Rehabilitation**

| Standard   | Project in Conformance? | Analysis   |
|--|-------------------------|--|
|  |                         | <p>building to be adaptively reused for a new, but similar historic function.</p> <p>Re-enclosure of a portion of the eastern elevation of Plate Shop #6 would not remove original materials from the building, rather, it would enclose a small, existing open-air portion of the building with district-appropriate corrugated metal, timber, and industrial windows, to allow the building to be adaptively reused for a new, but similar historic function.</p> <p>Installation of 40' x 45' doors on the east and west elevations of Shop #9 and Machine Shop and Warehouse #7 would remove small sections of original corrugated metal siding and small groupings of original windows on these two buildings. In consideration of the repetitive volumes of corrugated metal and industrial steel-sash windows present throughout the buildings and the larger district as a whole, the loss of a small grouping of windows on a relatively small section of the east and west elevations, and replacement of some of the original metal siding will not result in significant impacts to the buildings' integrity of materials and their ability to remain district contributors, as the vast majority of the buildings and their original materials would remain intact and sufficiently represented throughout the buildings and larger district.</p> |
| <p>10. New additions and adjacent or related new construction will 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.</p> | <p>Yes</p>              | <p>The proposed new construction within the historic district will not impair the form and integrity of the historic district, its contributing elements, and its historic setting/environment. No new additions are proposed, rather, all buildings will retain their existing configuration, massing, scale, and the vast majority of their original materials. Because these are relatively simple industrial buildings, clad in common materials, the proposed improvements could be removed in the future without impacting important character-defining features of the district.</p>  |

### 3.2.2 Integrity Considerations

In addition to analyzing impacts to individual buildings, it is necessary to consider the integrity of the larger district post-construction. NRHP Bulletin 15 states the following with regard to the integrity of historical resources:

All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.

Following implementation of the Proposed Revised Project, the district would still convey a grouping of industrial buildings united by a shared historic function, as expressed through their industrial location at the Port, configuration, massing and scale, utilitarian design, simple but dominant material types, and associated cranes and other mechanical equipment.

NRHP Bulletin 15 states the following with regard to the integrity of historical resources eligible under Criteria A and B:

A property important for association with an event, historical pattern, or person(s) ideally might retain some features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance, and would not be relevant if the property were a site. A basic integrity test for a property associated with an important event or person is whether a historical contemporary would recognize the property as it exists today.

In consideration of the historic district's integrity after implementation of the Proposed Revised Project, the district would retain sufficient integrity to remain eligible under NRHP Criterion A. Cleaning, repair, maintenance, and painting of metal, timber, or concrete siding will not visually impair the district, nor will minor changes to fenestration or the enclosure of open elevations. By retaining the buildings' current configuration; scale and massing; original exterior materials (i.e., corrugated metal, timber, concrete); the original windows (as feasible); associated exterior equipment (i.e., cranes); and in consideration of its industrial setting at the Port and its proposed new industrial function, the buildings would still be recognizable to a historical contemporary from the district's period of significance.

## 4 Findings and Recommendations

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### 4.1 Summary of Findings

This Adaptive Reuse Historical Resources Impacts Assessment includes the results of a site visit; review of the Proposed Revised Project description and associated improvement renderings for conformance of the Secretary of the Interior's Standards for Rehabilitation; and a detailed impacts assessment in consideration of historical resources under CEQA and LAHD's Built Environment Historic, Architectural, and Cultural Resource Policy. As a result, the adaptive reuse of five contributing buildings as described herein within the Bethlehem Shipyard Historic District appears to be in conformance with all 10 Standards for Rehabilitation and LAHD's adaptive reuse policies. After implementation of the required Mitigation and Lease Measures provided below, impacts to historical resources will be considered less than significant.

### 4.2 Mitigation and Lease Measures

The following mitigation measures and lease measures identified in the Final 2018 IS/MND shall be implemented as part of the Proposed Revised Project:

#### **Mitigation Measure MM CULT-1 Unanticipated Discovery of Archaeological Resources Condition**

In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); California Public Resources Code, PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

#### **Lease Measure LM CUL-1:**

1. Once a proposed project structure is identified, the LAHD shall make a determination on whether a Historical Resource Assessment is necessary to determine the presence of a historical resource, as defined under CEQA. If such an assessment determines that a historic resource is present, the LAHD shall determine the need to implement measures that might include, but are not limited to, one or more of the following to further avoid, minimize, or substantially reduce the identified impacts;
2. A preservation architect meeting the Secretary of the Interior's Professional Qualifications Standards in historic architecture shall participate in preconstruction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources;

3. Complete photographic documentation of the historic resource prior to implementing the project. Such documentation shall adhere to standards and guidelines for Historical American Buildings Survey (HABS), Historic American Engineering Record (HAER), and Historic American Landscapes Survey (HALS) documentation, as outlined in the November 2011 HABS/HAER/HALS 31 Guidelines set by the Heritage Documentation Programs instituted by the National Park Service (<http://www.cr.nps.gov/hdp/standards/halsguidelines.htm>).
4. For certain projects it may be necessary to establish an environmentally sensitive area and put up barriers to ensure the protection of specific built environment features, such as buildings, structures, and landscape and hardscape elements. The environmentally sensitive area shall be outlined on project plans and the construction crew must be made aware of restrictions and requirements for protecting historical resources for the duration of the project. A qualified professional meeting the Secretary of the Interior's Professional Qualifications Standards may be required to monitor the project to ensure adherence to restrictions.

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# Appendix A

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## Proposed Revised Project Renderings



























