
IV. ENVIRONMENTAL IMPACT ANALYSIS

C. CULTURAL RESOURCES

1. INTRODUCTION

The following section focuses on the Proposed Project's potential to result in significant impacts upon historic cultural resources, including archaeological, paleontological and historic resources. The historic impact assessment findings presented in this section are based on the information presented in the following report, which is provided in Appendix E.1 to this Draft EIR:

- *City Market Los Angeles, California Historic Resource Report, GPA Consulting, April 2014.*

The analysis presented below is based on the Department of City Planning's Environmental and Public Facilities Maps (Sept. 2006) and written correspondence from the South Central Coast Information Center at California State University Fullerton, dated June 3, 2013 (See Appendix E.2 to this Draft EIR), and written correspondence received in response to the NOP from the State of California Native American Heritage Commission (NAHC), dated February 15, 2013 (see Appendix B to this Draft EIR).

2. ENVIRONMENTAL SETTING

A. Regulatory Framework

Historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification, and in certain instances, protection of historic resources. Additionally, states and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities. The National Historic Preservation Act (NHPA) of 1966, as amended, and the California Register of Historical Resources (California Register) are the primary federal and state laws and regulations governing the evaluation and significance of historic resources of national, state, regional, and local importance. As archaeological resources are also considered historic, regulations applicable to historic resources are also applicable to archaeological resources and are discussed and analyzed in this section. Descriptions of these relevant laws and regulations are presented below.

(1) Federal Regulations

(a) National Register of Historic Places

The National Register of Historic Places (National Register) was established by the NHPA, as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."¹ The National Register recognizes properties that are significant at the national, state, and/or local levels.

¹ 36 Code of Federal Regulations (CFR) Section 60.2.

(ii) Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:²

- a) Associated with events that have made a significant contribution to the broad patterns of our history; or
- b) Associated with the lives of persons significant in our past; or
- c) Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d) Yield, or may be likely to yield, information important in prehistory or history.

(ii) Integrity

According to National Register Bulletin #15, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity.” Integrity is defined in National Register Bulletin #15 as “the ability of a property to convey its significance.”³ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials.

(iii) Context

To be eligible for listing in the National Register, a property must also be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.”⁴ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

(iv) Historic Districts

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”⁵

² Title 36 Code of Federal Regulations, Part 60.4

³ National Register Bulletin #15, at pages 44-45.

⁴ Ibid, at page 7.

⁵ Ibid, at page 5.

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.⁶ A district's significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.⁷

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

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.⁸

(b) Archaeological Resources

The federal Archaeological Resources Protection Act of 1979 (Public Law 96-95) protects archaeological resources and sites on federal and Indian lands, including requirements for issuance of permits by federal land managers to excavate or remove archaeological resources. The Native American Graves and Repatriation Act (1990) and the Native American Heritage Act (1984 and 1992) provide guidelines for protection of Native American remains and artifacts.

(c) Paleontological Resources

In 2009, the Paleontological Resources Preservation Act (PRPA) became law when President Barack Obama signed the Omnibus Public Land Management Act (OPLMA) of 2009, Public Law 111-011.⁹ The PRPA requires the Secretaries of the Interior and Agriculture to manage and protect paleontological resources on Federal land using scientific principles and expertise. The PRPA includes specific provisions addressing management of these resources by Federal agencies. It provides authority for the protection of paleontological resources on Federal lands including criminal and civil penalties for fossil theft and vandalism. The PRPA only applies to Federal lands and does not affect private lands.

⁶ Title 36 Code of Federal Regulations, Part 60.3(d).

⁷ National Register Bulletin #21, p. 12.

⁸ National Register Bulletin #16, p. 16.

⁹ P.L. 111-011, Title VI, Subtitle D on Paleontological Resources Preservation (known by its popular name, the PRPA) (123 Stat. 1172; 16 U.S.C. 470aaa).

(2) State Regulations

(a) California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.¹⁰ The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.¹¹

The criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. Resources less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.¹²

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:¹³

¹⁰ *Public Resources Code Section 5024.1(a).*

¹¹ *Public Resources Code Section 5024.1(d).*

¹² *Public Resources Code Section 4852.*

¹³ *Public Resources Code Section 5024.1.*

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [OHP] procedures and requirements;
3. The resource is evaluated and determined by the office [OHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

(b) California Office of Historic Preservation Survey Methodology

The evaluation instructions and classification system prescribed by the OHP in its *Instructions for Recording Historical Resources* provide a three-digit evaluation rating code for use in classifying potential historic resources. In 2003, the codes were revised to address the California Register.

The first digit indicates the general category of evaluation. The second digit is a letter code to indicate whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number, which is coded to describe some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

(3) Local Regulations

(a) City Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Sections 22.171 et. seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments. The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. Administrative Code Section 22.171.7 states that:

For purposes of this article, a 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.

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as Monuments.

(b) Conservation Element

The City's guidelines for the protection of archaeological and paleontological resources are contained in Chapter II, Section 3 of the City's General Plan Conservation Element. The City's guidelines for the protection of Historic and cultural resources are contained in Section 5. The Conservation Element establishes the policy to continue to protect pre-historic, historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.

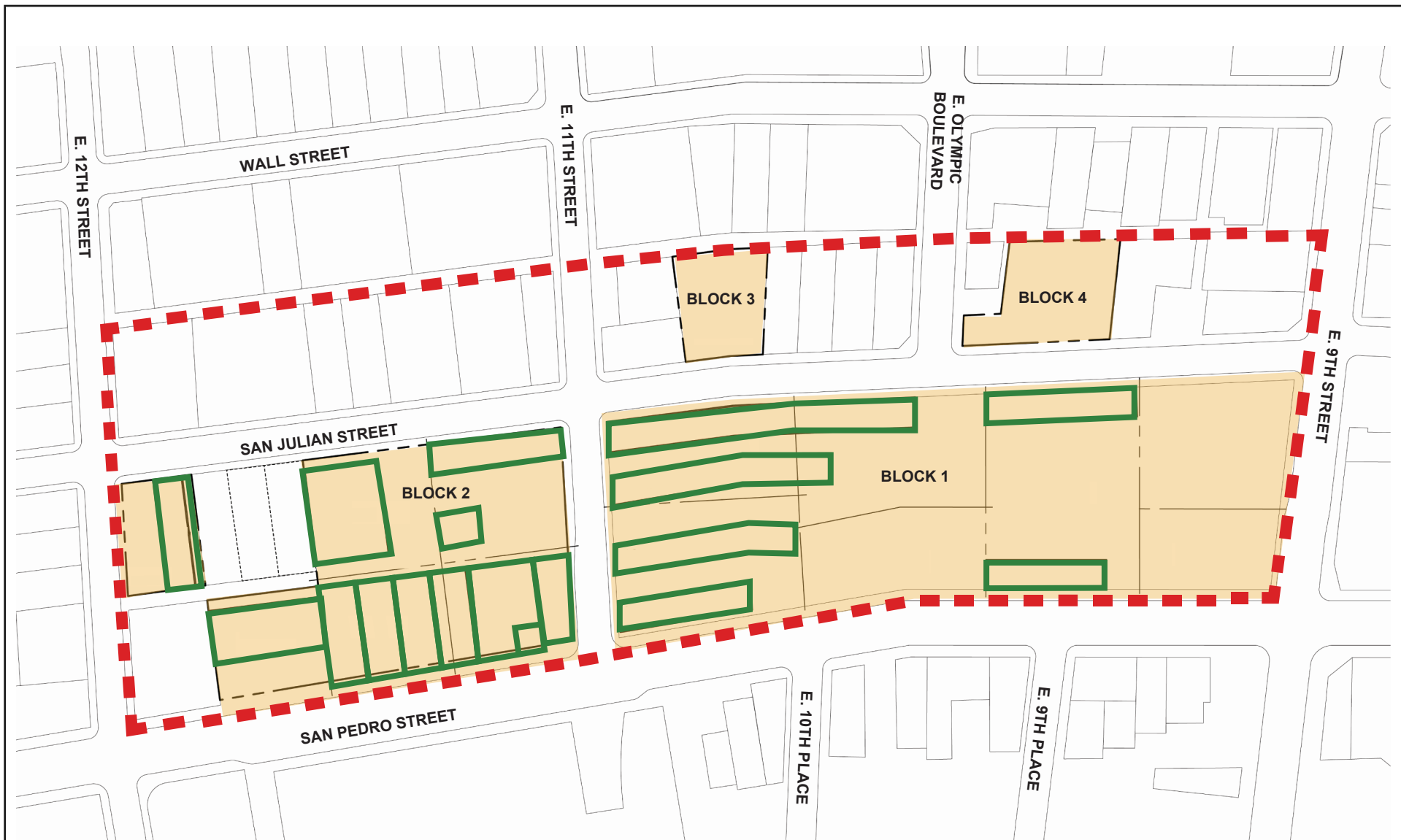
B. Historic Resources Study Area

(1) History of the Study Area

For purposes of this analysis, the Project Site and surrounding area of potential effect properties were identified for evaluation within the historic resources study area. The Historic Resources Study Area is identified in Figure IV.C-1, on page IV.C-7. The following presents an overview of the history of development within the study area evaluated within the Historic Resources Report. For a more detailed historical account of the development within the survey area, see Appendix E.1 to this Draft EIR.

The Project Site and surrounding historic resources study area is located within the boundaries of the original city limits of Los Angeles. In the late 19th century the area was subdivided as home sites by real estate speculators such as Montgomery Moran and O.W. Childs. The Sanborn Fire Insurance Maps indicate that the area was nearly built out with one and two story single-family residences, duplexes, and flats by the turn of the century.

In 1909, the character of the area was dramatically altered by the completion of the City Market of Los Angeles at the corner of 9th and San Pedro Streets. The City Market of Los Angeles was a wholesale produce market owned by a cooperative of white, Japanese, and Chinese farmers. The corporation, called the City Market of Los Angeles, secured a lease for a new two-block site between San Julian and South



LEGEND



STUDY AREA



PROJECT SITE



EXISTING BUILDINGS ON PROJECT SITE



IMAGE NOT TO SCALE

Sources: Hanson LA, Base Map, 2013; GPA Consulting; Parker Environmental Consultants, 2014



Figure IV.C-1
Historic Resource Study Area

San Pedro Streets, south of 9th Street and just north of 11th Street.¹⁴

When City Market was constructed, it contained the largest single paved area in Los Angeles. The area covered more than six acres. When completed, its facilities were state-of-the-art and were described in the *Los Angeles Times* as “one of the finest in the entire United States” because “sanitation will be perfect” due to a system of drains and water spigots which would allow the area to be cleaned easily and frequently. The new facility was serviced by spur tracks from the electric railroad line on Central Avenue; shipments were brought into the market along the electric railroad tracks on 9th Street.¹⁵ Figure IV.C-2, Historic Photographs of the Original City Market Complex depict the land uses and activities that were occurring on site around 1915.

With the completion of the Los Angeles Union Terminal Produce Market (9th Street Market) in 1918, the City Market of Los Angeles began to develop the southernmost end of the block between 9th and 11th Streets, and moving south of 11th Street as well. The market buildings south of 11th Street never became quite as popular as those to the north. These southern market buildings were primarily used as warehouse space as opposed to selling space.¹⁶ In the 1940s, freestanding produce sheds were constructed in the paved area between the original market buildings, reflecting the increased prominence of trucks as a primary form of shipment.

By 1940, City Market had grown to be one of the largest wholesale produce facilities in the country. It was “the largest handler of strawberries and fresh vegetables west of the Mississippi River.”¹⁷ Upon the internment of Japanese and Japanese Americans in 1942, the dynamic of the produce industry shifted.

Japanese farmers grew more than 95% of the strawberries produced in Southern California by the early 1940s. The internment of Japanese and Japanese American citizens left a gaping hole in the industry, and the Farm Security Administration predicted a shortage in the crop. Also affected was the production of tomatoes, peas, onions, and carrots.¹⁸ Chinese and white growers took over the properties left behind by the Japanese during World War II. These included farms, wholesale produce companies, and grocery stores. In the post-war era, Japanese farmers and wholesalers would regain ownership of their properties.

New practices in the industry at mid-century began to contribute to the slow decline of wholesale produce markets like City Market. By the mid-1960s, wholesale produce markets like City Market and Terminal Market nearby were considered relics of a past era, ones that were “creaking and straining to meet the requirements of modern food distribution in a metropolitan area of more than seven million.”¹⁹ They were no longer viewed as effective or relevant, as the city and demand for produce rapidly grew.

¹⁴ “Huntington Backs New City Market,” *Los Angeles Times*, May 2, 1909, p. VI. This *Los Angeles Times* article indicates that the land leased by City Market was owned by Henry E. Huntington, but assessor records show that the land was Los Angeles city land. The remainder of the land between San Julian and San Pedro streets, bordering on 11th Street, was owned by O.W. Childs. It would later be acquired by City Market.

¹⁵ “Six Acre Paved Area in New Market,” *Los Angeles Times*, June 17, 1909, p. II3.

¹⁶ Information obtained in email communication with Randy Yamamoto, CFO of City Market, August 28, 2012.

¹⁷ “Southland Supplies 88 Per Cent of Nation’s Strawberries,” *Los Angeles Times*, April 1, 1940, p. A12.

¹⁸ “Strawberry Shortage Looms Due to Jap Farm Evacuation,” *Los Angeles Times*, April 16, 1942, p. 1.

¹⁹ Harry Trimborn, “Produce Markets Here Called Costly Relics,” *Los Angeles Times*, Dec. 27, 1966, p. 9A.



Historic photograph of the original City Market complex, c.1915. Source: City Market of Los Angeles.



The original City Market complex, c.1915 Source: City Market of Los Angeles.

Source: City Market Los Angeles, California Historic Resource Report, GPA Consulting, June 2013

The area surrounding City Market was as culturally diverse as the market itself. Due to the long working hours demanded by the industry, workers did not have time to travel to and from home. So they began to live in white-owned boarding houses located near City Market. Discriminatory housing practices also limited where Chinese and Japanese workers could live. As the community grew, increasing the demand for Chinese groceries and other businesses, Chinese-run grocery stores and other retail establishments sprung up in the area around City Market.²⁰

The Chinese community further developed around 9th Street when their earlier community, later known as Old Chinatown, was leveled for the construction of Union Station in 1933. Beginning in the late 1920s, Chinese began moving to other areas of the city, the primary one being the area around City Market.²¹ Families settled on Crocker, 9th, and 10th Streets, as well as Towne Avenue, to the northeast of the market. The area became home to a large number of Chinese and Chinese American residents, but residents indicate that it remained racially diverse and not necessarily identifiable as a “Chinatown.”²²

The coming of World War II also introduced new industries to Los Angeles, including the defense industry. Chinese residents were able to obtain jobs in the defense industry, at times moving outside the neighborhood around City Market. The construction of New Chinatown to the north also contributed to the out-migration of Chinese and Chinese Americans from the area during and directly after World War II.²³ Similarly, after returning from internment, Japanese Americans began moving from the city to suburban communities, rather than returning to inner city locations such as the neighborhood around City Market.²⁴ By the early 1950s, the area no longer served as a primary Chinese or Japanese community. The residential buildings, now entirely gone, were replaced by commercial and industrial buildings designed for retail or wholesale businesses, mostly related to the produce or fashion industries.

2. Description of the Study Area

The study area is located on the eastside of downtown Los Angeles. The vicinity consists of commercial and industrial buildings, both large and small. The majority are one to three stories in height, with buildings of four or more stories interspersed and located primarily to the northwest. Development is dense, and streets are aligned along a northeast-southwest grid that defines downtown Los Angeles from the rest of the city. South San Pedro Street, the eastern boundary of the study area, is a major thoroughfare, and East 9th Street is an important east-west connection through downtown.

The study area includes the former site of the City Market of Los Angeles and also includes independently owned wholesale produce companies, which were presumably drawn to the area by City

²⁰ Fickle, p. 4.

²¹ William Gow, “Neighborhoods,” *Los Angeles Chinatown Remembered*, http://www.chinatownremembered.com/index.php?Itemid=69&id=20&option=com_content&view=article (accessed August 15, 2012).

²² The area also included a sizable African American population, anchored by the First AME Church at 8th and Towne.

²³ Fickle, p. 13.

²⁴ Nadine and Donald Hata, “Into the Mainstream: Asians and Pacific Islanders in Post-1945 Los Angeles,” in *City of Promise: Race and Historical Change in Los Angeles*, edited by Martin Schiesl and Mark M. Dodge (Claremont, CA: Regina Books, 2006), p. 91.

Market. The Fashion District surrounds the study area, and fashion-oriented businesses have slowly crept into the area that was once dominated by the wholesale produce industry. Within the Historic Resources Study Area, a total of 16 buildings and one structure were identified as potential historic resources and were further evaluated to determine whether they meet the criteria to be classified as historic resources. Table IV.C-1 identifies the 16 buildings and one structure that are part of either the study area or Project Site. Figure IV.C-3 provides a map identifying the location of the 16 buildings and one structure that were evaluated in the Historic Resources Report. Corresponding photographs of the evaluated buildings are provided in Figures IV.C-4 through IV.C-6, Photographs of Evaluated Buildings, on pages IV.C-12 through IV.C-14, respectively.

Building 1: 1015 San Julian Street (APN 5145-019-014)

The building at 1015 San Julian Street (posted address 1015-17 San Julian Street) is a one-story commercial building constructed 1926 in no particular style. This building is not within the Project Site, nor is it a part of the Proposed Project. It is, however, within the area of potential effect that is being analyzed within the EIR. The building faces southeast onto San Julian Street and is rectangular in plan with a slightly raised, stepped parapet. The front (southeast) half of the roof is flat, the rear (northeast) half is slightly rounded from the bow-truss. The building is clad in brick. The primary elevation is divided into three bays. Two of the bays contain storefronts with double glass doors flanked by single-light metal floor-to-ceiling display windows. The third bay was covered by a metal roll-up door. It presumably contains the same storefront system in the other two bays. Alterations to the building include changes to the parapet, a seismic retrofitting with exposed anchor plates, the painting of the brick on the primary elevation, and the replacement of storefronts.

The building was originally constructed as a market in 1926 by owner Patrick J. Prunty with Frank Stiff listed as the architect. The original occupants are unknown, as the address was not found in Los Angeles city directories until 1936. At that time, an A. Arai occupied the building (1015 San Julian) and ran a lunchroom or restaurant. Research did not reveal the name of the restaurant, if any. By 1938, Sasaki Takeyo had a restaurant or lunchroom at 1015 San Julian; research did not reveal the name of the restaurant, if any. By 1942, a restaurant or lunchroom owned by Mio Kazue occupied the space. By 1956, there were two occupants, Paul's Café at 1015 San Julian and Louie Produce Co. at 1017 San Julian. Louie Produce Co. occupied 1017 San Julian until at least 1973. Paul's Café occupied 1015 San Julian until at least 1987. The building was occupied by Lloyd's Produce by 1973. It is now occupied by commercial businesses related to the fashion industry.

Building 2: 1125 San Julian Street (APN 5145-024-016)

1125 San Julian Street is not within the Project Site, nor is it a part of the Proposed Project. It is, however, within the defined boundaries of the area of potential effect that is being analyzed within the EIR. The building is a one-story commercial building constructed in 1931 in no particular style. It faces southeast onto San Julian Street, is rectangular in plan and has a bow-truss roof with a slightly raised parapet. The building is clad in brick. The primary elevation is divided into three bays. Two of the bays contain

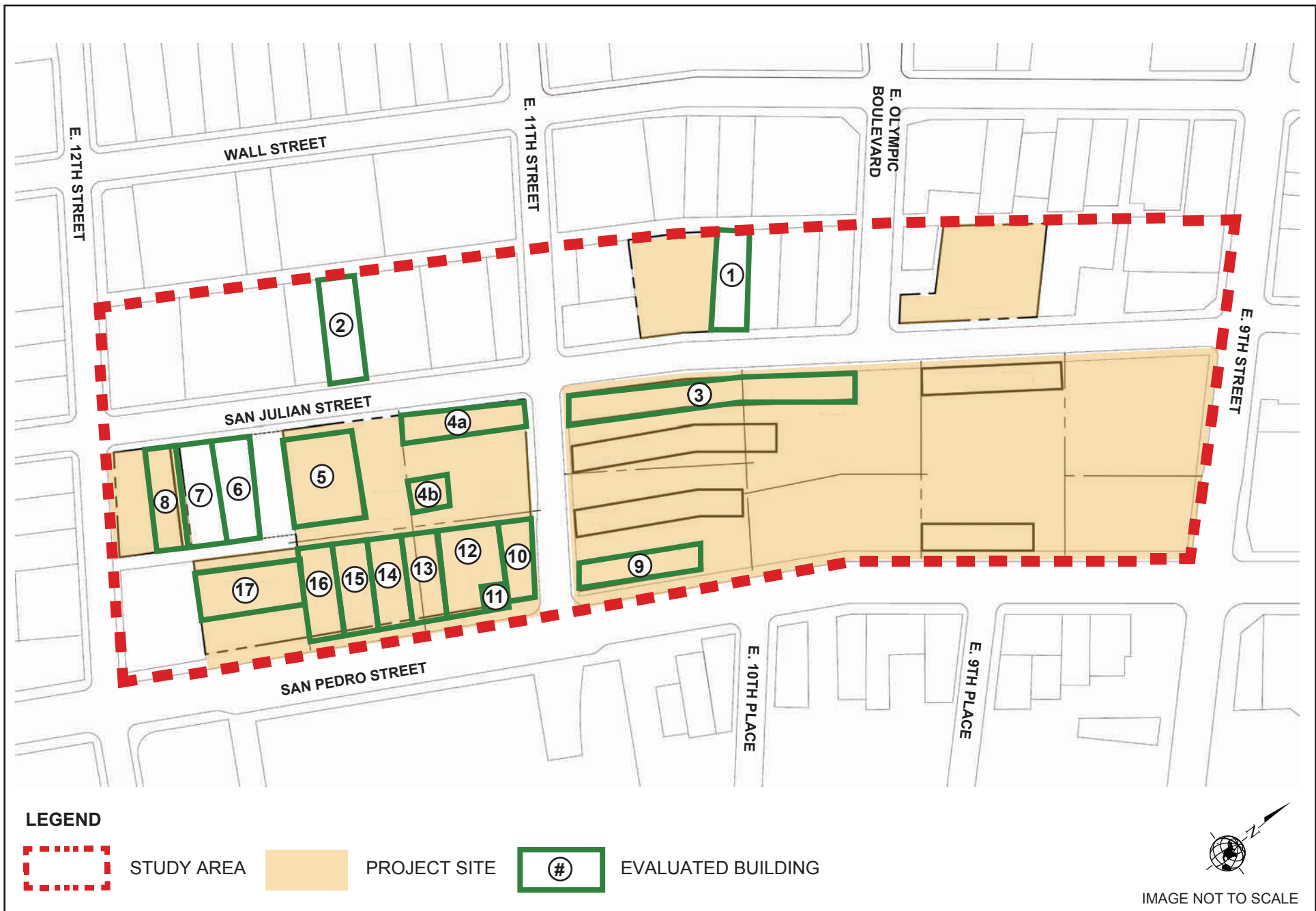
**Table IV.C-1
 Description of Buildings**

Building Number	Address	Part of Project Site	Description
1	1015 San Julian Street	No	One-story commercial building
2	1125 San Julian Street	No	One-story commercial building
3	1040-76 San Julian Street	Yes (Block 1, Site 5)	One-story commercial building
4a	1102 San Julian Street	Yes (Block 2, Site 1)	Two-story commercial building
4b	1102 San Julian Street	Yes (Block 2, Site 1)	Parking lot and one-story industrial building
5	1122 San Julian Street	Yes (Block 2, Site 5)	Two-story industrial building
6	1142 San Julian Street	No	Two-story brick commercial building
7	1146 S. San Julian Street	No	Three-story brick commercial building
8	1150 S. San Julian Street	Yes (Block 2, Site 6)	Freestanding loading dock with a raised concrete bed and angled roof overhangs
9	1051-53 S. San Pedro Street	Yes (Block 1, Site 7)	Two-story commercial building
10	1101 S. San Pedro Street	Yes (Block 2, Site 2)	Two-story commercial building
11	1105 S. San Pedro Street	Yes (Block 2, Site 2)	One-story, unreinforced masonry, commercial building
12	1109-13 S. San Pedro Street	Yes (Block 2, Site 2)	One-story commercial building
13	1117 S. San Pedro Street	Yes (Block 2, Site 2)	One-story commercial building
14	1119 S. San Pedro Street	Yes (Block 2, Site 3)	One-story commercial building
15	1125 San Pedro Street	Yes (Block 2, Site 3)	Two-story commercial building
16	1127 San Pedro Street	Yes (Block 2, Site 4)	One-story commercial building
17	1137 S. San Pedro Street	Yes (Block 2, Site 4)	One-story industrial building

Source: GPA Consulting, 2014.

storefronts with double glass doors flanked by single-light metal floor-to-ceiling display windows with a transom above each. The third bay was covered by a metal roll-up door. It presumably contains the same storefront system in the other two bays. Alterations to the building include changes to the parapet, a seismic retrofitting with exposed anchor plates, and the replacement of storefronts.

The building was originally constructed by City Market as a public garage in 1931 with Austin M. Hill listed as the architect. The original occupants are unknown, as the address was not found in Los Angeles city or street directories until 1956. At that time, Lou Yam Produce Co. occupied the building and remained there until at least 1964. Prior to 1956, Lou Yam Produce Co. was listed at 1000 San Julian. No city or street directory listing was found for this building past 1964. The building was occupied by Lloyd's Produce by 1973. It is now occupied by commercial businesses related to the fashion industry.



Sources: Hanson LA, Base Map, 2013; GPA Consulting; Parker Environmental Consultants, 2014



Building 1: 1015 San Julian Street, southeast elevation.



Building 2: 1125 San Julian Street, southeast elevation.



Building 3: 1040-1076 San Julian Street, northwest elevation.



Building 4A: 1102 San Julian Street, northwest elevation.



Building 4B: 1102 San Julian Street northeast and northwest elevations.



Building 5: 1122 San Julian Street, northwest and northeast elevations.

Source: City Market Los Angeles, California Historic Resource Report, GPA Consulting, June 2013



Building 6: 1142 San Julian Street, northwest elevation.



Building 7: 1146 San Julian Street, northwest elevation.



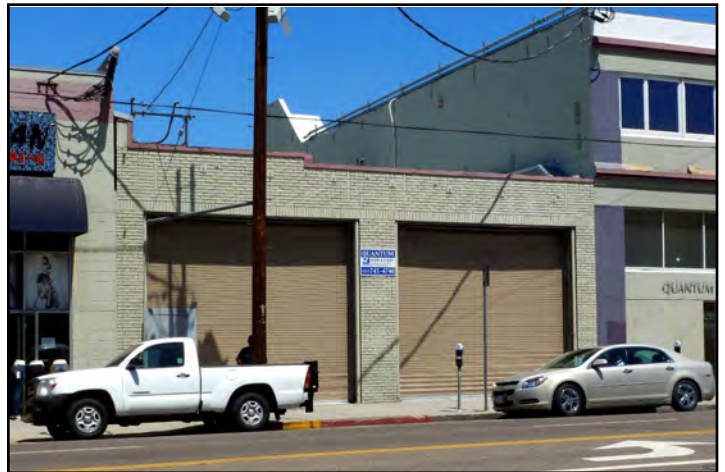
Structure 8: 1150 San Julian Street, northwest and southwest elevations



Building 9: 1051-53 South San Pedro Street, southeast elevation.



Building 10: 1101 South San Pedro Street, northeast and southeast elevations.



Building 11: 1105 South San Pedro Street, southeast elevation.

Source: City Market Los Angeles, California Historic Resource Report, GPA Consulting, June 2013



Building 12: 1109-13 South San Pedro Street, southeast elevation. Building 13: 1117 South San Pedro Street, southeast elevation.



Building 14: 1119 South San Pedro Street, southeast elevation. Building 15: 1125 South San Pedro Street, southeast elevation.



Building 16: 1127 South San Pedro Street, southeast elevation. Building 17: 1137 South San Pedro Street, southeast elevation.

Source: City Market Los Angeles, California Historic Resource Report, GPA Consulting, June 2013



Figure IV.C-6
Photographs of Evaluated Buildings 12 - 17

Building 3: 1040-76 San Julian Street (APN 5145-018-006)²⁵

The building at 1040-76 San Julian Street is a one-story commercial building constructed between 1921 and 1922 in no particular style.²⁶ It is located on the northeast corner of San Julian and East 11th Streets on Block 1 of the Project Site. It is rectangular in plan and has a flat roof with slightly raised parapet. The building is clad in smooth stucco. The primary elevation is divided into bays. Originally, each bay contained a wood push-up door and a band of fixed wood windows, however most have been replaced metal roll-up doors or the openings have been boarded over. Alterations to the building include the boarding over or replacement (with metal roll-up doors) of approximately two-thirds of the bays (once market stalls) and the boarding over of some of its windows. One bay has been filled in with a metal roll-up door but retains its original wood window openings above.

The building was originally constructed by City Market. In 1922, it was occupied by United Fruit Company (1040 San Julian Street), Mah Chung (1044 San Julian Street), Eag San Company (1046 San Julian), Benn Chin Company (1048 San Julian Street), Maydole-Smith Company (1050 San Julian Street), Moreno Brothers Company (1054-56 San Julian Street), Roselli and Sons (1058-60 San Julian), and Continental Produce Company (1064-76 San Julian Street). There was turnover in some portions of the building, but a number of the produce companies occupied the space for numerous decades. Highland Fruit Company was there from at least 1926 until at least 1942. Season Produce, which had moved into the building by 1942, remained until at least 1973. The Moreno Brothers Company occupied their portion of the building until at least 1973. Chungking Produce Company operated out of the building from at least 1956 until at least 1987.

Building 4: 1102 San Julian Street (APN 5145-025-001)

The building at 1102 San Julian Street (Building 4A; the posted address for the building includes 1100–10 San Julian Street) is located at the southeast corner of East 11th and San Julian Streets on Block 2 of the Project Site. It is a two-story commercial building constructed in 1925 in no particular style. The building is rectangular in plan and is constructed of board-formed concrete. It has a concrete foundation and a flat roof with a slightly raised, flat parapet. The northeast and northwest elevations have divided bays with storefronts on the first story and floor-to-ceiling aluminum single-light fixed windows on the second story. The bays are divided by plain concrete pilasters, and the storefronts consist of floor-to-ceiling single-light fixed windows and sets of double aluminum doors. The first and second stories are divided by a concrete lintel. Alterations to the building include the replacement of windows and doors.

There is a parking lot and one-story industrial building (Building 4B) on the southeast portion of the parcel. Building 4B is constructed of both concrete block and board-formed concrete. The southwest elevation is occupied by a loading dock with two bi-fold doors at the south end. Alterations to the

²⁵ *The building is located on the same parcel as the buildings at 915 South San Pedro Street (the original City Market buildings) but has separate posted addresses.*

²⁶ *The original building permit was not found; however, a 1921 permit was filed by City Market for the demolition of an existing stable on the site and by 1922, permits were being filed by occupants of the building for the installation of roll-up awnings for the market stalls.*

building include the filling of what must have originally been a third set of bi-fold doors at the north end with concrete block. The northeast elevation may have been entirely open at one point in time.

Building 4A was constructed by City Market. The original occupants are unknown, as the address was not found in Los Angeles city directories until 1938. At that time, Seibe M. Miura occupied the building; he owned a wholesale produce company, which had two locations—the 1102 San Julian location and another one at 722 Central Avenue. By 1942, the Pioneer Produce Sales Corporation occupied the building. By 1956, the occupant was Kushi A.K. Produce, which remained in the building until at least 1969. The building was occupied by Lloyd's Produce by 1973. It is now occupied by commercial businesses related to the fashion Industry.

Building 5: 1122 San Julian Street (APN 5145-025-002)

The building at 1122 San Julian Street is a two-story industrial building constructed in 1928 in no particular style. It is located on Block 2 on the Project Site and faces northwest onto San Julian Street. The building is rectangular in plan and has a flat roof with a raised parapet. The foundation is raised and the entire building is constructed of board-formed concrete. The building is broken up visually into two stories by a stringcourse. There is a second stringcourse along the top of the building, beneath the parapet. The northeast elevation features a broad flat canopy over a loading dock. The northwest and northeast elevations are divided into bays. Each bay contains a wood paneled bi-fold door and row of four multi-light steel windows above on the first story and groups of multi-light steel windows on the second story. The exception to this pattern is the central bay on the northwest elevation, which has two, non-original metal roll-up doors of differing heights. There is a pedestrian door on the southwest side of the northwest elevation. The two bays on the southwest side of the northwest elevation feature multi-light steel windows above the doors. There is a one-story covered loading dock along the full length of the southwest elevation. It is constructed of concrete and has a flat roof with raised parapet. It features an interior roll-up door set back from the primary (northeast) elevation. Alterations to the building include the replacement of one wood bi-fold door with two metal roll-up doors and the addition of a pedestrian door on the southwest side of the northwest elevation. The northeast portion of the parcel is occupied by a parking lot.

The building was constructed by City Market. It was occupied in 1956 by four distributors—Jim Dandy Markets, a fruit wholesaler; Morse and Chorna, citrus distributors; National Hotel Equipment; and Northern Produce Company (all were listed under the address 1124 San Julian Street, but this appears to be the listing for the subject building as it is the closest address in the city directories; this address is not associated with an Assessor's Parcel Number on its own). In 1960, the building was occupied by Morse and Chorna, National Hotel Equipment, and Gelson's Market Company.

Building 6: 1142 San Julian Street (APN 5145-025-004)

The building at 1142 San Julian Street is a two-story brick commercial building constructed in 1925 in no particular style. It is not located on the Project Site but is within the boundaries of the area of potential effect. The building faces northwest onto San Julian Street. The building is rectangular in plan with a flat roof. The building's first story contains three storefronts. The two storefronts on the southwest side of the

building feature double glass doors flanked by single-light metal floor-to-ceiling display windows and a single-light window above. The third bay was covered by a metal roll-up door. It presumably contains the same storefront system in the other two bays. All three storefronts are topped with fabric awnings. There are three recessed multi-light steel windows with a combination of fixed panes and awnings on the primary elevation. There are two signs on the building—one blade sign and one sign fixed to the exterior above the central storefront bay. Alterations to the building include the replacement of the storefronts and the likely removal of the parapet.

The building's original owner was the Los Angeles Drug Company, a wholesale drug company. They remained in the building until at least 1950. By 1954, the building was owned by A.C. Weber and Company, a sewing machine manufacturer. A.C. Weber remained in the building until at least 1973. It is now occupied by commercial businesses related to the fashion industry.

Building 7: 1146 San Julian Street (APN 5145-025-005)

The building at 1146 San Julian Street (posted address 1144–46 San Julian Street) is a three-story brick commercial building constructed in 1926 in no particular style. It is not located on the Project Site but is within the area of potential effect. The building is rectangular in plan with a flat roof. The first story contains three storefronts. The northeast storefront features a single glass door and a set of double glass doors, separated by a pane of glass; both have single-light windows above. The two southwest storefronts each have a set of double glass doors and large single-light windows, both to the side of the doors and above. The second and third stories have multi-light steel windows with a combination of fixed panes and awnings. There is a metal fire escape with two balconies on the southwest side of the primary elevation. Two of the three storefronts have fabric awnings above, one of which likely covers a multi-light steel window on the second story; there is a sign fixed to the primary elevation above the central storefront. Alterations to the building include the replacement of the storefronts.

The building was originally owned by the Los Angeles Drug Company and was utilized as a warehouse. They owned the building until 1952. The building was owned by Erna Weber from 1953 to 1954, Bob and Ben Miller from 1955 to 1975, co-owned by Bob and Benn Berger in 1958, and co-owned by Maurice Holman Incorporated from 1959 to 1961. By 1956, the building was occupied by garment companies, including Metro of California Inc. Sportswear, Montebello Garment Company, Inc. Rene Belts of California, Sierra Madre Sportswear of California, Thunderbird of California Sportswear. All are listed under the address 1144 San Julian; no listing of 1146 San Julian is included in the city directories (1144 San Julian is not associated with an Assessor's Parcel Number on its own). The building is now occupied by commercial businesses related to the fashion industry.

Structure 8: 1150 San Julian Street (APN 5145-025-006)

The structure at 1150 San Julian Street is a freestanding loading dock with a raised concrete bed and angled roof overhangs. It is located on Block 2 of the Project Site and is situated at the northeast corner of East 12th and San Julian Streets and is situated on the northeastern-most portion of its parcel. It was constructed in 1937 for City Market. The roof is comprised of two angled metal overhangs that rise towards the outside edges. They are supported at the center by a series of paired metal beams attached

with crossbars and at each end by metal T-brace piers. The roof perimeter features bands at the top and bottom in relief. The northwest end of the structure also has a rectangular concrete structure anchored to the concrete bed; it has a small metal window with metal bars in the northwest wall. The remainder of the site is occupied by a surface parking lot. Alterations include the expansion of the loading dock in 1955.

Building 9: 1051–53 South San Pedro Street (APNs 5145-018-007 and 5145-018-008)

The building at 1051–53 South San Pedro Street is a two-story commercial building constructed in 1922 in no particular style. It is located on Block 1 of the Project Site and is situated at the northwest corner of East 11th and South San Pedro Streets. It is rectangular in plan and has a flat roof with a slightly raised parapet. The building is clad in smooth stucco. The two primary elevations (southwest and southeast) are divided into storefronts. The majority of the storefronts have been removed and the openings filled in with textured stucco or boarded over. The storefronts on the northeast side of the southeast elevation remain; they feature wood tilt-up doors, one of which has been covered with corrugated metal, and fixed multi-light windows above. There are three pedestrian doors, two wood ones on the southwest elevation and one metal door on the southeast elevation. The northwest elevation also features divided storefronts, with a combination of metal roll-up doors, metal pedestrian doors, and multi-light metal window wall. Windows on the building consist of aluminum sliders, two-over-one wood sashes, and three filled in window openings. Other features of the building include a fabric awning over a portion of the northwest elevation and two signs fixed to the exterior on the south corner and southeast elevation. Alterations to the building include the replacement of windows, the removal of the storefronts and openings, the replacement and removal of the windows, and the addition of new pedestrian doors and openings.

The building was expanded in 1922 and 1925. It was occupied by the wholesale produce company United Distributors in 1929; the company was owned by K. Saito, J. Mori, and M. J. Okamoto. By 1938, it was occupied by Jobbers Daily Wholesale Produce, owned by George Shimoda. By 1942, the building's occupant was the Balsano Produce Company, owned by Charles Balsano and Anthony Cicero, and by 1956, it was occupied by Elite Produce Company, who remained in the building until at least 1960. By 1965, the I-T Produce Company had moved into the building.

Building 10: 1101 South San Pedro Street (APN 5145-025-007)

The building at 1101 South San Pedro Street is a two-story commercial building constructed in 1930 in no particular style. It is located on Block 2 of the Project Site at the southwest corner of South San Pedro and East 11th Streets. The building is rectangular in plan and has a flat roof with a raised parapet. It is constructed of board-formed concrete. The two primary elevations (northeast and southeast) are divided into bays—six bays on the northeast elevation and two on the southeast elevation. Each bay on the northeast elevation contains a storefront; the storefronts feature double metal doors and two floor-to-ceiling single-light metal windows. Of the storefronts on the southeast elevation, one features one floor-to-ceiling metal window (the remainder of this storefront is open and its composition unknown); the other bay features a poured in place concrete wall and a metal door with single-light sidelight. Above each storefront are rows of large single-light vinyl windows. The first and second stories are separated by a stringcourse. The second story features the same bay divisions as the first; each bay contains rows of

single-light vinyl fixed and casement windows. Other features of the building include lights attached above the first story, and a blade sign on the east corner. Alterations to the building include the replacement of the storefronts and windows and addition of lights along the two primary elevations.

City Market constructed the building in 1930 for wholesale produce businesses. It was occupied by Venice Celery Distributors from 1932 until at least 1942.²⁷ By 1956, it was occupied by E & L Fruit and Produce Distributors. Gilbert Nut Company occupied the building from at least 1965 until at least 1973. The building is now occupied by commercial businesses related to the fashion industry.

Building 11: 1105 South San Pedro Street (APN 5145-025-008)

The building at 1105 South San Pedro Street shares a parcel with three other buildings with the posted addresses: 1109-13, 1117, and 1119 South San Pedro Street. It is located on Block 2 of the Project Site and faces southeast onto South San Pedro Street. It is a one-story, unreinforced masonry, commercial building constructed in no particular style. It is rectangular in plan and has a flat roof with a slightly raised, stepped parapet. The southeast elevation features two bays, both of which contain a metal roll-up door. It is unknown if there are storefronts behind the security doors. There is a metal pedestrian door located in the southwest roll-up door. Alterations to the building include a seismic retrofitting with exposed anchor plates and the addition of the roll-up doors.

The building was constructed in approximately 1924; the original owners are unknown, as an original building permit was not found. The first permit for a building at this address was filed in 1927, and listed the owner as California Bank. The next permit was filed by City Market in 1947. The work was described as the construction of a plate glass door and a vestibule. Therefore it is unknown if this building was originally constructed by City Market, or if City Market purchased an existing building. The original occupants are unknown, as the address was not found in Los Angeles city or street directories until 1932. At this time, Jue Joe Co. occupied the building. The company remained in the building until at least 1956. There is no listing of the address again until 1965, when the space was occupied by “Cal State of Che.” By 1967, Fairways Produce was listed at 1105 ½ San Pedro until at least 1973. In 1973, Bomac Electrical Service occupied 1105 San Pedro. The current occupants of the building, if any, are unknown.

Building 12: 1109-13 South San Pedro Street (APN 5145-025-008)

The building with the posted address of 1109-13 South San Pedro Street shares a parcel with three other buildings with the posted addresses: 1105, 1117, and 1119 South San Pedro Street. 1109-13 is located on Block 2 of the Project Site and faces southeast onto South San Pedro Street. It is a one-story commercial building constructed in no particular style. It is rectangular in plan and has a flat roof with a raised parapet. The building is mostly constructed of concrete block. The southeast elevation features three bays, all of which contain storefronts with double glass doors flanked by single-light metal floor-to-ceiling display windows with a transom above each. According to the building permit record, the building was

²⁷ *Venice Celery was a Japanese-owned business, so it would likely have been sold to someone else upon the internment of Japanese and Japanese Americans in 1942.*

partially destroyed by fire in 1999 and largely rebuilt in 2000. However, it appears to be an entirely new building. It currently houses the City Market maintenance shop and three garment stores.

The building was constructed in approximately 1924; the original owners are unknown, as an original building permit was not found. The first permit for a building at this address was filed in 1952, and listed the owner as City Market. The original occupants are unknown, as the address was not found in Los Angeles city or street directories until 1936. At this time, Warren Young, a produce commission merchant, occupied the building. The address is not listed again until 1956, when Pan-Am Distributing Corp was listed as the occupant. Pan-Am Distributing Corp. occupied the space until at least 1987. In 1973, a joint-occupant, Bernie's Sandwich Stand was first listed. Bernie's Sandwich Stand occupied the building until at least 1987. The building is now occupied by commercial businesses related to the fashion industry.

Building 13: 1117 South San Pedro Street (APN 5145-025-008)

The building with the posted address of 1117 South San Pedro Street shares a parcel with three other buildings with the posted addresses: 1105, 1109-13, and 1119 South San Pedro Street. 1117 San Pedro Street is located on Block 2 of the Project Site and faces southeast onto South San Pedro Street. It is a one-story commercial building constructed in no particular style. It is rectangular in plan and has a bow-truss roof with a raised parapet. The building is clad in smooth stucco. The southeast elevation features a centered metal roll-up door for vehicles flanked by two multi-light fixed windows. Alterations include the expansion of the building (presumably on the rear) in 1947 and the addition of the roll-up door.

The building was constructed in approximately 1924; the original owners are unknown, as an original building permit was not found. The first permit for a building at this address was filed in 1947, and listed the owner as City Market. The original occupants are unknown, as the address was not found in Los Angeles city or street directories until 1956. At this time, Anshin S. Produce Co. occupied the space. A longtime occupant, Anshin S. Produce Co. was listed at this address until at least 1987. The current occupants of the building, if any, are unknown.

Building 14: 1119 South San Pedro Street (APN 5145-025-008)

The building with the posted address of 1119 South San Pedro Street shares a parcel with three other buildings with the posted addresses: 1105, 1109-13, and 1117 South San Pedro Street. 1119 San Pedro Street is located on Block 2 of the Project Site and faces southeast onto South San Pedro Street. It is a one-story commercial building constructed in no particular style. It is rectangular in plan and has a bow-truss roof with a raised parapet. The building is clad in brick. The southeast elevation features a centered metal roll-up door for vehicles flanked by two multi-light fixed windows divided by four brick pilasters. Alterations include the expansion of the building (presumably on the rear) in 1932, a seismic retrofitting with exposed anchor plates, and the addition of the roll-up door.

The building was constructed in approximately 1924; the original owners are unknown, as an original building permit was not found. The first permit for a building at this address was filed in 1937, and listed the owner as City Market. The earliest occupant listed in the city directory is Young Produce Co. in

1929. By 1936, K&S Jobbers occupied the building, and remained there until at least 1965. By 1967, G. Shapiro and the Shandler Prepacking Plant were listed as the occupants, and remained there until at least 1973. The Shapiro-Gilman-Shandler Co, as listed in 1973, had another location at 1059 San Pedro. The current occupants of the building, if any, are unknown.

Building 15: 1125 South San Pedro Street (APN 5145-025-009)

The building at 1125 South San Pedro Street (the posted address for the building is 1127 South San Pedro Street) is a one-story commercial building constructed in approximately 1935 in no particular style. It is located on Block 2 of the Project Site and faces southeast onto South San Pedro Street. The building is rectangular in plan and has a bow-truss roof with a slightly raised parapet. It is constructed of poured-in-place concrete. The southeast elevation features three bays, the central bay larger and outlined by an entrance cast in relief. The entrance consists of two pilasters with Art Deco stylistic influences. The bays are covered with metal roll-up doors. It is unknown if there are storefronts behind the security doors.

This building appears to have been identical to the adjacent building at 1127 South San Pedro Street. If so, the alterations include not only the replacement of the storefronts and the addition of the roll-up doors, but also the resizing of the openings in each bay.

The building was likely constructed by City Market in approximately 1935, based on a demolition permit to clear the site in 1934, listing City Market as the owner. The original occupants are unknown, as the address was not found in Los Angeles city or street directories until 1942. At this time, the Potato Marketing Co. was the occupant. By 1956, the building was occupied by two businesses, George Kamrass Fruit and Vegetable Broker and the Saul Lasher Potato Sales Company. By 1960, only Potato Sales Company was listed until 1964. The address was not listed again until 1973, when the Crown Produce Warehouse occupied the building. In 1987, Morita Produce Company was listed at this address. The current occupants of the building, if any, are unknown.

Building 16: 1127 South San Pedro Street (APN 5145-025-010)

The building at 1127 South San Pedro Street (the posted address for the building is 1129 South San Pedro Street) is a one-story commercial building constructed in approximately 1935 in no particular style. It is located on Block 2 of the Project Site and faces southeast onto South San Pedro Street. The building is rectangular in plan and has a bow-truss roof with a slightly raised parapet. The building is constructed of poured-in-place concrete. The southeast elevation features three bays, the central bay larger and outlined by an entrance cast in relief. The entrance consists of two pilasters with Art Deco stylistic influences. The central bay contains a storefront consisting of a set of aluminum and glass double doors flanked by floor-to-ceiling display windows. The storefront on the southwest side of the elevation consists of a set of aluminum and glass double doors with a single-light sidelight. Each bay contains a band of fixed aluminum windows. The northeast bay contains two floor-to-ceiling aluminum windows. Alterations to the building include the replacement of the storefronts.

The building was likely constructed by City Market in approximately 1935, based on a demolition permit to clear the site in 1934, listing City Market as the owner. The original occupants are unknown, as the

address was not found in Los Angeles city or street directories until 1956. At this time, the Willard Snyder Produce Company was the occupant. Morita Produce Company was listed at 1129 ½ San Pedro Street from at least 1956 until 1962. The address was not listed again until 1973, when Quaker City produce occupied the building. The building is now occupied by commercial businesses related to the fashion industry.

Building 17: 1137 South San Pedro Street (APN 5145-025-011)

The building at 1137 South San Pedro Street is a one-story industrial building constructed in 1948 in no particular style.²⁸ It is located on Block 2 of the Project Site and is set back from the street, with a surface parking lot in the front. The building is rectangular in plan with a bow truss roof. It is constructed of brick. The street-facing (southeast) elevation features a combination of metal roll-up doors and wood bi-fold doors along its entire length; they are raised above street level and are accompanied by a loading dock. There is a metal canopy along the entire length of the elevation and a set of stairs on the north and south ends. The northwest elevation faces another surface parking on the rear side of the building. It also features a combination of metal and wood roll-up doors along its length, which are raised above the parking area and accessed by a loading dock. An extending corrugated metal canopy covers the elevation. There is a set of stairs on the south end of the elevation. Alterations include the replacement of some of the wood bi-fold doors with metal roll-up doors.

The building was likely constructed by City Market (see footnote on previous page). In 1956, the building was occupied Growers Marketing Company of San Diego and Rideout Produce Company (listed under 1139 and 1139 ½ San Pedro, respectively; there are no city directory listings for 1137 San Pedro and these are the closest, and most likely, listings; the addresses 1139 and 1139 ½ are not linked to their own Assessor's Parcel Numbers). By 1960, Rideout Produce Company had been replaced by Quaker City Produce. By 1965, the building was occupied by Sleeper Produce and Quaker City Produce.

3. Evaluation of Eligibility

As previously stated, the study area was included in a 1992 historic resource survey conducted by the Los Angeles Community Redevelopment Agency (CRA/LA). Two potential historic districts with related histories and overlapping boundaries were identified in the study area: City Market and City Market Area Chinese Grouping. The buildings associated with the potential City Market district were entirely located in the study area and include the original City Market buildings that have since been demolished, the remnants of two buildings, and the buildings described above. The City Market Area Chinese Grouping included the same buildings as well as additional buildings west of San Julian Street and east of South San Pedro Street. The City Market Area Chinese Grouping was not re-evaluated as a part of the Historic Resources Report as it extends beyond the study area.

²⁸ Assessor records indicate that the building was constructed in 1948, but a building permit from 1946 reveals that a building on this site owned by City Market was re-roofed. The building on the site in 1946 appears to have been replaced or encompassed by the building constructed in 1948. It can be surmised that City Market constructed the building since they are listed as the owners of the earlier building.

The 1992 survey would not meet the criteria for historic resource surveys subject to CEQA, as outlined in Public Resource Code 5024.1(g). The 1992 survey only included an inventory form for the district as a whole, and did not include inventory forms for the contributing or noncontributing buildings. As such, the 1992 survey would not meet the current procedures and requirements of the SOHP. Most importantly, the survey is well over five years old, so it would be considered out-of-date for CEQA purposes. For these reasons, there would be no presumption that buildings included in the 1992 survey are historic resources subject to CEQA. As a majority of the City Market complex has been demolished and the remaining buildings have been altered since they were surveyed in 1992, their eligibility as historic resources had to be re-evaluated.

The 1992 inventory form for the potential City Market historic district argued for significance in the context of the produce industry as “a key monument to the history of the Chinese and Japanese produce vendors in Los Angeles.” The period of significance was established as 1909 to 1930. GPA re-evaluated the buildings associated with the City Market of Los Angeles in the same context; however, the period of significance was established as 1909 to 1941. The period of significance begins in 1909 with the construction of the City Market of Los Angeles. A depiction of the evolution of the City Market Los Angeles’s development from 1910 to 1940 is presented in Figure IV.C-7. As shown in Figure IV.C-7, the original market was located at the north end of the study area at 915 South San Pedro Street and included four buildings. These buildings are gone save for the remnants of two buildings, which consist of concrete structural frames. The City Market of Los Angeles expanded to the southernmost end of the block between East 9th and 11th Streets during the 1920s, and moved south of East 11th Street during the 1930s and 1940s. These southern market buildings were primarily used as warehouse space as opposed to selling space. The period of significance concludes in 1941. Upon the internment of Japanese and Japanese Americans in 1942, the multi-cultural aspect of City Market was forever changed. Although many returned to the produce industry after World War II, the industry itself had changed. The present status of the buildings associated with the City Market of Los Angeles are summarized in Table IV.C-2, below.

There are 13 buildings remaining from the period of significance, all of which have been altered. The original City Market of Los Angeles (the four buildings from 1909) is gone with the exception of the remnants of two buildings that cannot be considered contributing. The buildings that remain were constructed during a later period of development in the history of the City Market of Los Angeles, 1921-1937. Only four of these buildings are mostly intact and are recognizable for their association with the wholesale produce industry. Four of the buildings are so altered that they do not retain sufficient integrity from the period of significance to be considered contributing.

Regardless of the significance of the potential historic district, it does not retain integrity as a whole; the original City Market of Los Angeles is gone, there are only nine would-be contributing buildings that do not form a cohesive historic environment when combined with the surrounding buildings, and the nine would-be contributing buildings cannot convey the significance of the early history of the City Market of Los Angeles. (See Figure IV.C-8, The City Market of Los Angeles Buildings Considered Would Be Contributors to a Historic District.) Therefore, the remaining buildings were evaluated individually as

**Table IV.C-2
 City Market of Los Angeles Survey Building Evaluations**

Map Key # Evaluated Buildings	Address	Comment	Date	Status
2	1125 San Julian Street	No comment	1931	Contributing, altered
3	915 S. San Pedro Street	Posted address of 1040-76 San Julian Street	1921-22	Contributing, altered
4A	1102 San Julian Street	Facing San Julian Street	1925	Noncontributing, substantially altered
5	1122 San Julian Street	No comment	1928	Contributing, mostly intact
8	1150 San Julian Street	No comment	1937	Contributing, mostly intact
9	1051-53 S. San Pedro Street	Posted address of 1051-53 S. San Pedro Street	1922	Contributing, altered
10	1101 S. San Pedro Street	No comment	1930	Noncontributing, substantially altered
11	1105 S. San Pedro Street	Post address of 1105 S. San Pedro Street	C. 1924	Contributing, altered
12	1105 S. San Pedro Street	Post address of 1109-13 S. San Pedro Street	C. 1924	Noncontributing, substantially altered
13	1105 S. San Pedro Street	Posted address of 1117 S. San Pedro Street	C. 1924	Contributing, mostly intact
14	1105 S. San Pedro Street	Posted address of 1119 S. San Pedro Street	C. 1924	Contributing, mostly intact
15	1125 S. San Pedro Street	Posted address of 1127 S. San Pedro Street	C. 1935	Noncontributing, substantially altered
16	1127 S. San Pedro Street	Posted address of 1129 S. San Pedro Street	C. 1935	Contributing, altered

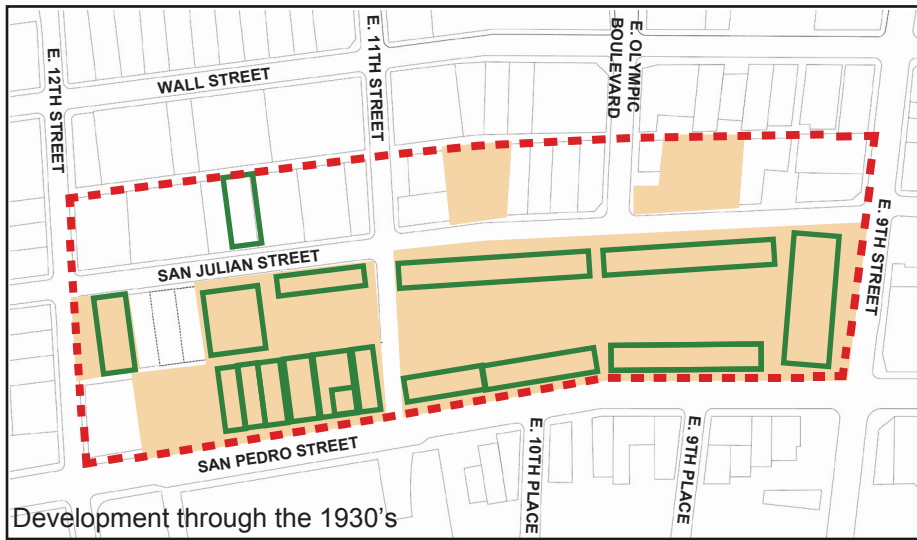
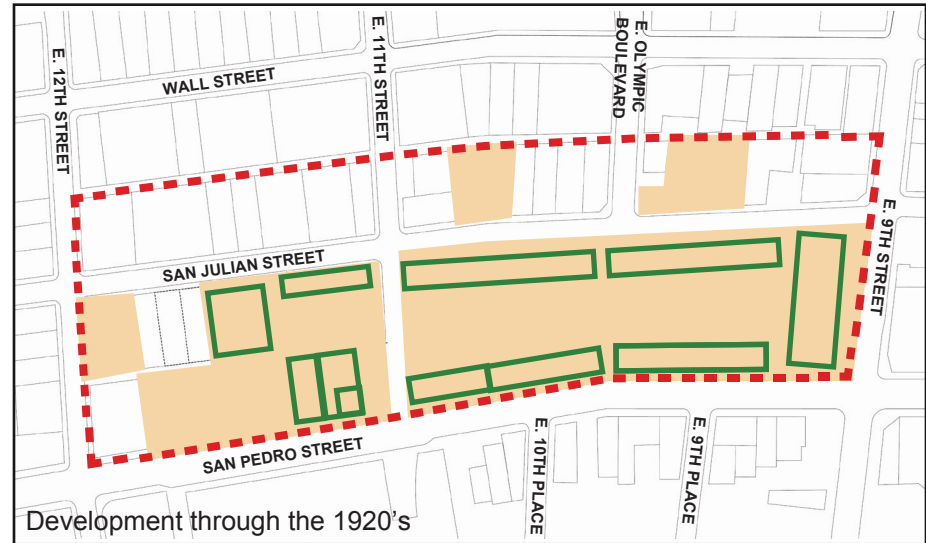
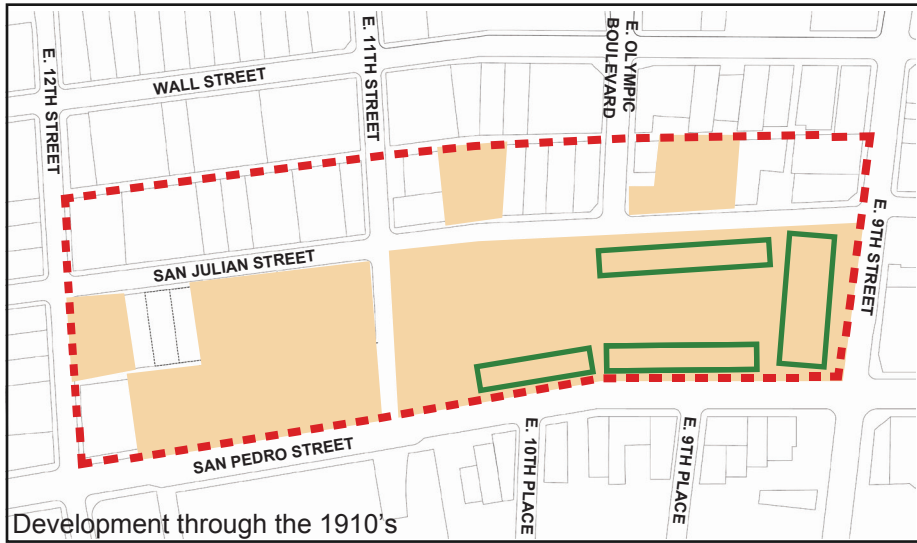
Source: City Market Los Angeles, California Historic Resource Report, GPA Consulting, June 2013

potential historic resources. Please note, however, that the assessment of integrity for individual buildings, as outlined below, is more stringent than the assessment of whether a building is considered a would-be contributing or noncontributing building to the potential historic district.

(a) National Register of Historic Places (Individual Buildings and Structures)

Building 1: 1015 San Julian Street (APN 5145-019-014)

Criterion A – The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The contexts considered in this evaluation were the development of the wholesale produce industry in Los Angeles and the history of Japanese and Japanese Americans, as well as Chinese and Chinese Americans, in Los Angeles. It should be noted that these contexts are somewhat intertwined given the important role these groups played in the development of the wholesale produce industry.



LEGEND

- STUDY AREA
- PROJECT SITE
- EVOLUTION OF BUILDINGS

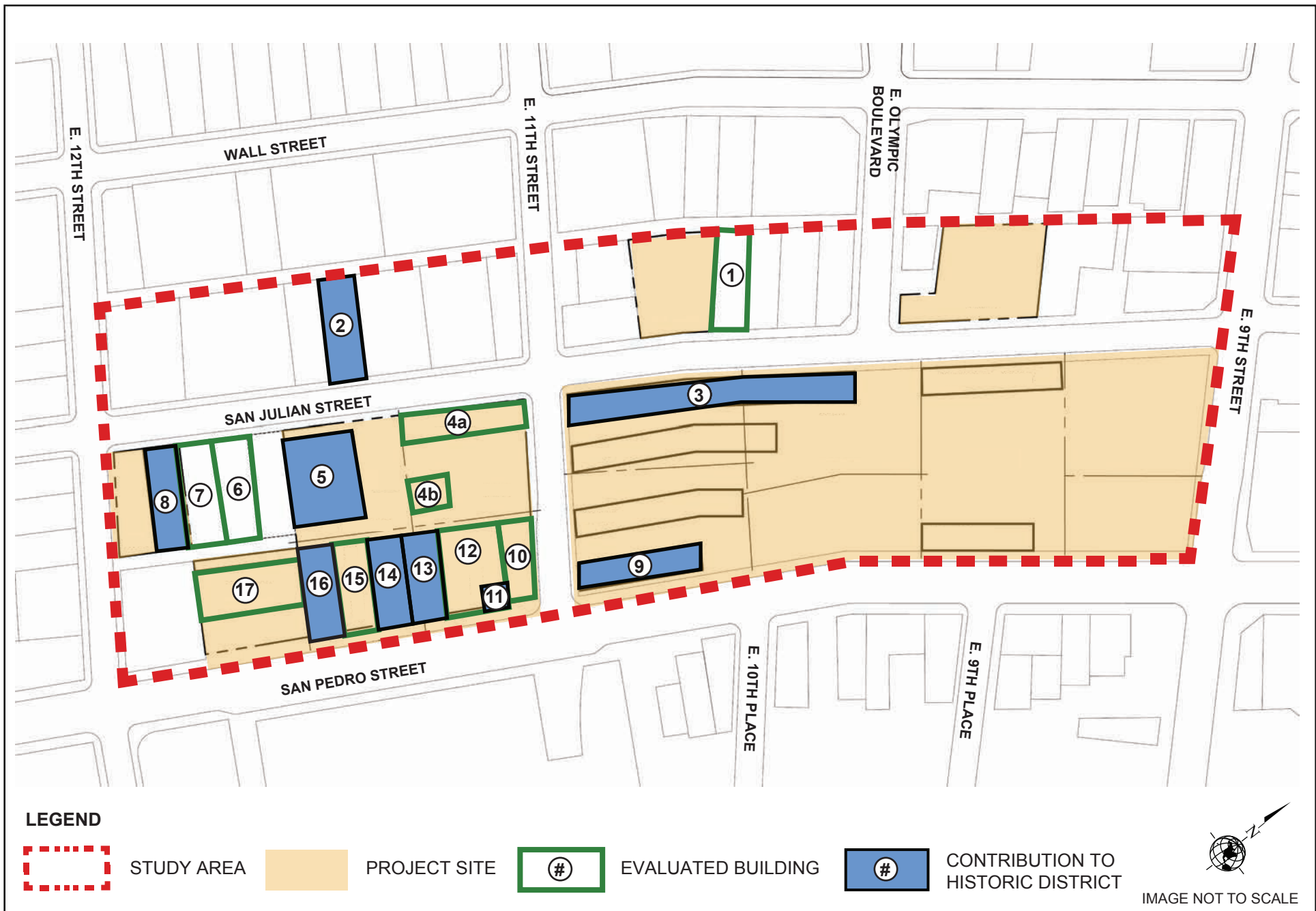


IMAGES NOT TO SCALE

Sources: Hanson LA, Base Map, 2013; GPA Consulting; Parker Environmental Consultants, 2014



Figure IV.C-7
Evolution of the City Market Los Angeles (1910-1940)



Sources: Hanson LA, Base Map, 2013; GPA Consulting; Parker Environmental Consultants, 2014



Figure IV.C-8
The City Market Los Angeles Buildings
Considered Would be Contributors to a Historic District



The building at 1015 San Julian Street is located adjacent to the original City Market complex. Its occupants indicate that it was connected with the commercial ventures that sprang up in the area around City Market and supported the Japanese and Chinese populations in the area. It was occupied by a series of restaurants owned by Japanese or Japanese Americans in the late 1930s and early 1940s, prior to the internment of Japanese and Japanese Americans during World War II. By 1956, Louie Produce Company occupied the building and remained there until at least 1973. Paul's Café was also located in the building from at least 1956 until at least 1992.²⁹

The 1992 survey indicates that the building was constructed by Henry Wong, who may have constructed other commercial buildings in the area. No information was found to indicate that Wong constructed the building at 1015 San Julian Street, however. The original owner is indicated at Patrick J. Prunty on the original building permit.

The building was occupied by a restaurant run by Sasaki Tayeko from 1938 to 1939 and one owned by Mio Kazue from 1941 to 1942. It is not known how long the restaurant run by Mio Kazue remained in the building, but it no longer occupied the building by 1956. No information was found on either restaurant to indicate that they were significant in the history of Japanese and Japanese Americans in Los Angeles.

The building's other occupants tie it to the history of Chinese and Chinese Americans in the area. Louie Produce Company was founded in 1908 by the family of Chung Moy Louie.³⁰ It was one of seventeen Chinese-owned produce companies out of 155 produce companies operating in Los Angeles in 1910.³¹ By 1929, city directories indicate that there were at least 40 Chinese-owned produce companies in Los Angeles. By 1942, that number had decreased; there were at least 24 Chinese-owned produce companies in the city at that time.³²

Louie Produce Company was a long-standing, family-owned business in the City Market vicinity for much of the 20th century and appears to have been one of the earliest founded in the city by a Chinese family. The company therefore appears significant within the context of Chinese and Chinese Americans' contributions to the wholesale produce industry in Los Angeles. However, the company did not occupy the subject building until almost 50 years after its founding. The company's earliest location was in a market stall in the original City Market complex. It was located in buildings constructed by City Market until at least 1942 (976 San Julian Street). By 1956, it was located at 1015 San Julian Street but is also listed at 976 San Julian Street. Therefore the building's association with Louie Produce Company is not sufficiently important, and by extension the building is not significant under Criterion A within the above contexts.

²⁹ City directories indicate that the building was occupied by Paul's Café until at least 1987, and in the 1992 survey, the building is identified as Sun Kuang Lam Produce/Paul's Café.

³⁰ Fickle, p. 5.

³¹ Fickle, p. 5.

³² This tally is based solely upon company names that include Chinese names in the titles, i.e. Quong Hing Produce Company; there are likely more that are not easily identified by the company name, such as Season Produce, which was known through research to have been a Chinese-owned business.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

The building was constructed by Patrick J. Prunty. Census research indicates that Prunty was born c.1881 in Ireland and arrived in the United States in 1904. He was a fruit and vegetable dealer/produce vendor.³³ No information was found to indicate that Prunty could be considered a person significant in our past.

The 1938 city directory indicates that Sasaki Tayeko lived at 640 ½ Towne Avenue. No information was found on Tayeko. No information on Mio Kazue was found beyond the listing of the restaurant in the 1941 and 1942 city directories. No information was found to indicate that either Tayeko or Kazue could be considered significant persons in our past.

Research indicates that Louie Produce Company was founded by the family of Chung Moy Louie. Who exactly founded the company is not known. By 1942, the company was owned by Dan and Sam Louie. The 1930 census indicates that Dan Louie was born about 1900 in China and worked in the wholesale produce industry on his own account. The 1940 census indicates that Sam Louie was born in 1908 in China and was a proprietor in the wholesale produce industry.³⁴ No further information was found about Dan or Sam Louie to indicate that they could be considered persons significant in our history.

Therefore, the building is not significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building is a typical example of an industrial building; it does not embody the distinctive characteristics of a particular type or period, as its construction or design details do not represent a particular period. Furthermore, its alterations lend it the appearance of a commercial building now, which was not its original intended use. It is a typical unreinforced masonry building and does not embody the distinctive characteristics of a method of construction. It is not significant under this aspect of Criterion C.

The building was designed by architect Frank L. Stiff. Stiff was a Los Angeles architect who designed commercial buildings. His work includes the Kay Bee Block (1913) at 420 Boyd Street in downtown Los Angeles, the Safeway Market (1939) at 3909 Sunset Boulevard (later the home of the Black Cat Bar) in the Silver Lake neighborhood of Los Angeles, and the Leimert Park Safeway store (1939) at the southwest corner of Leimert Boulevard and West 43rd Street.³⁵ Stiff does not appear to qualify as a master architect, as his body of work appears to have been relatively small and tended to be modest in scale and design. Furthermore, the building at 1015 San Julian Street is a modest industrial building and could not be said to be a representative example of Stiff's work. It is not significant as the work of a master architect.

³³ 1930 and 1940 United States Federal Censuses, www.ancestry.com (accessed June 18, 2013).

³⁴ 1930 and 1940 United States Federal Censuses, www.ancestry.com (accessed June 18, 2013).

³⁵ "Store Chain Opens Leimert Branch," Los Angeles Times, February 4, 1940, page E2.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated as an individual property, this aspect of Criterion C does not apply.

Therefore, the building is not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the building has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. The building's setting has been somewhat altered by the demolition of the original City Market buildings, which were located nearby. The buildings adjacent to it on the same side of the street largely remain. One building has been demolished directly adjacent to it. The surrounding setting remains largely comprised of low-rise industrial and commercial buildings, much as it was when the building was constructed. Therefore, the integrity of setting, though impacted, remains.

The building no longer retains its integrity of design, as it has been altered by the addition of commercial storefronts. The 1992 survey's description of the building indicates that it contained two vehicular doors on the south side of the primary elevation (now commercial storefronts) and a storefront on the north side of the primary elevation (now a roll-up door). The appearance of the building in 1992 may reflect its original appearance, or one closer to the original, given its uses. The two bays on the south side of the building (1017 and 1019 San Julian) held wholesale produce companies and the bay on the north side (1015 San Julian) held a restaurant. Therefore, the building has been heavily altered from its earlier (though not necessarily original) appearance.

The building is an unreinforced masonry building. Its storefronts and roll-up door are non-original, reflecting alterations to its primary elevation. Its original materials have therefore been substantially altered, and the building no longer retains integrity of materials or workmanship. The building no longer retains integrity of feeling, as it feels primarily like a commercial building rather than an industrial warehouse building due to its alterations. The building is not significant under Criteria A or B, so there is no relevant association to evaluate.

In conclusion, the building no longer retains the majority of its applicable aspects of integrity and is not significant under any of the four National Register established criteria. It is therefore not eligible for listing on the National Register.

Building 2: 1125 San Julian Street (APN 5145-024-016)

Criterion A – The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The contexts considered in this evaluation were the development of the wholesale produce industry in Los Angeles and the history of Chinese and Chinese Americans in Los Angeles. It should be noted that these contexts are somewhat intertwined given the important role Chinese and Chinese Americans played in the development of the wholesale produce industry.

City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, between 9th and 11th Streets, just north of the site of the subject building. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. As it expanded, it acquired the land the subject building is located on from developer O.W. Childs. Much of the original City Market complex has been demolished. The subject building was constructed in 1931 when City Market was expanding southwest of 11th Street. It was originally constructed as a public garage by City Market. It was later home to a wholesale produce company. It is not known when the building transitioned from being a public garage to a warehouse space.

The building housed Lou Yam Produce Company by 1956 until at least 1964. Lou Yam Produce Company was located at 1000 San Julian from at least 1923 until at least 1942. By 1973, the subject building housed Lloyd's Produce. Research did not reveal any information that would indicate either company could be considered significant in our past. The building is not significant for its association with these produce companies, nor does it effectively convey the history of City Market on its own.

Lou Yam Produce Company was owned by Lou Yam, who was Chinese American. Research does not indicate that the company made a significant contribution to the history of the Chinese American community in Los Angeles.

Therefore, the building is not significant under Criterion A for an association with the contexts above.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

City Market, whose president at the time was Edward J. Fleming, constructed the building. While Fleming is associated with City Market as a whole, there is no evidence that he was directly associated with this building in particular. The building was one of many constructed by City Market while he was president.

The building housed Lou Yam Produce Company for at least 20 years. The company was owned by Lou Yam, a Chinese American produce merchant. Lam was born c.1888.³⁶ He owned Lou Yam Produce Company from at least 1923 until at least 1964. Research did not reveal any information that would indicate Yam could be considered a person significant in our past.

Therefore, the building is not significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building is a typical example of an industrial building; it does not embody the distinctive characteristics of a particular type or period, as its construction or design details do not represent a particular period. It is a typical unreinforced masonry building (now reinforced with non-original seismic anchor plates) from its period and does not embody the distinctive characteristics of a method of construction. It is not significant under this aspect of Criterion C.

Austin M. Hill designed the building. Hill was an engineer; he designed the loading dock at 1150 San Julian Street in 1937, the building at 1101 South San Pedro in 1930, and is listed as the engineer for an addition to 1125 South San Pedro in 1938. Hill worked for the Bureau of Right of Way and Land by the 1950s, and was director of the Bureau in the 1960s. He does not appear to have been significant as a master engineer. The building therefore is not significant under this aspect of Criterion C.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated as an individual property, this aspect of Criterion C does not apply.

Therefore, the building is not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the building has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. When the building was constructed, the surrounding setting consisted of low-rise industrial buildings, many of them devoted to warehouse space for the wholesale produce industry. The setting today is comprised of low-rise commercial buildings, many of them converted from industrial to

³⁶ 1920 United States Federal Censuses, www.ancestry.com (accessed June 25, 2013).

commercial use. Others were constructed at a later date but remain similar in size and scale to earlier buildings. The building therefore retains its integrity of setting.

The building has been altered, including the alteration of its parapet in the 1950s, seismic retrofit and the addition of exposed anchor plates, and the addition of storefronts in what were warehouse spaces, likely with roll-up doors on the primary elevation. These alterations have resulted in the loss of the building's integrity of design. The building's alterations have also resulted in a loss of the original materials. All that remains of the original materials is the masonry shell. The building therefore no longer retains its integrity of materials and workmanship.

The alterations to the building's primary elevation have given it the appearance of a commercial building, rather than an industrial building or public garage, which was its original use. The building no longer retains its integrity of feeling. The building is not significant under Criteria A or B, so there is no relevant association to evaluate.

In conclusion, the building no longer retains the majority of its applicable aspects of integrity and is not significant under any of the four National Register established criteria. It is therefore not eligible for the National Register.

Building 3: 1040-76 San Julian Street (APN 5145-018-006)³⁷

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The contexts considered in this evaluation were the development of the wholesale produce industry in Los Angeles and the history of Japanese and Japanese Americans, as well as Chinese and Chinese Americans, in Los Angeles. It should be noted that these contexts are somewhat intertwined given the important role these groups played in the development of the wholesale produce industry.

City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, between 9th and 11th Streets, just north of the site of the subject building. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. As it expanded, it acquired the land the subject building is located on from developer O.W. Childs. Much of the original City Market complex has been demolished. The subject building was constructed in 1921-1922 when City Market was expanding to the southwest.

The building housed a number of wholesale produce companies, including the Moreno Brothers Company, which was established at the beginning of the 20th century. The company was one of the first tenants in the market when it was completed, moving into the subject building when it was constructed in

³⁷ *The building is located on the same parcel as the buildings at 915 South San Pedro Street (the original City Market buildings) but has separate posted addresses.*

1921-1922. The company operated out of City Market until the Wholesale Produce Market was constructed on Olympic Boulevard in the 1980s.³⁸ Research did not indicate any reason to believe that the company could be considered significant in our past, despite having operated for a long period of time. The building is not significant for its association with this company, nor does it effectively convey the wholesale produce market property type or the history of City Market on its own. Therefore, it is not significant under Criterion A for an association with this context.

One Japanese-owned wholesale produce company and two Chinese-owned wholesale companies occupied the building, the former in the pre-World War II period and the latter two during and after World War II. Highland Fruit Company was a Japanese-owned and operated company. While this fits within the context of the Japanese history in Los Angeles and reflects the group's close association with the produce industry, there is no evidence that Highland Fruit Company could be considered a significant company in the history of the city or industry. Season Produce Company was a Chinese or Chinese American owned wholesale produce company, as was Chungking Produce. While Chinese and Chinese Americans made significant contributions to the wholesale produce industry in general, there is no evidence, from the research found, that either company in particular played a significant role within the history of the wholesale produce industry. The building therefore is not significant under Criterion A for an association with the above contexts.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

City Market, whose president at the time was Edward J. Fleming, constructed the building. While Fleming was associated with the establishment of City Market as a whole, there is no evidence that he was directly associated with this building in particular.

Vincenzo Moreno established the Moreno Brothers Company, one of the produce companies associated with the building for the longest period of time, in 1910. Moreno emigrated to the United States, first New York City and later Los Angeles, from Italy at the beginning of the 20th century. Although he began a produce company that remained open until at least the 1980s, research conducted does not indicate that he could be considered a person significant in our past.

The building was occupied by Highland Fruit Company from approximately 1926 to 1942. Kenjiro Shinozaki and Teijiro Watanabe owned the company from at least 1929 until at least 1939. Shinozaki was also president of the International Trading Company in 1936 (he appears to have stepped down by 1939). Shinozaki immigrated to the United States in 1907 from Japan. Watanabe was born in Japan c.1887 and immigrated to the United States in 1906. However, no further information was found about either Shinozaki or Watanabe to indicate that they could be considered significant persons in our past.³⁹

³⁸ Rand Green, "Moreno Bros. 2 is a young company with a hundred-year heritage," *The Produce News*, <http://producenews.com/index.php/company-profile/6060-moreno-bros-2-is-a-young-company-with-a-hundred-year-heritage> (accessed September 27, 2012).

³⁹ 1930 and 1940 United States Federal Censuses, www.ancestry.com (accessed September 27, 2012).

By 1942, Watanabe, Fred Y. Yamada, Jack H. Arai, and H. Sasuke Fujiwara owned Highland Fruit Company. No information was found about Yamada, Arai, or Fujiwara to indicate that they may have been significant to national, state, or local history.

Season Produce occupied the building from approximately 1942 until at least 1973. Howard Chin owned the company. Research did not reveal any information that indicates that Chin could be considered a significant person in national, state, or local history.

Chungking Produce Company occupied the building from at least 1956 until at least 1987. David Kitman Woo and Wilbur K. Woo, a father and son, managed Chungking Produce. Wilbur Woo later became vice-president of Cathay Bank in Los Angeles in 1962, the first Chinese American bank in Southern California.⁴⁰ He served as Chairman of the Board for *The Chinese Times*, the oldest Chinese language newspaper in the country. He has also served as a member and chairman of a number of commissions affiliated with Chinese businesses, such as the Asian American National Business Alliance (first chairman), founder and chairman of the California-Taiwan Trade and Investment Council, and president of the Chinese Chamber of Commerce. He has worked for much of his career since the 1960s in furthering the ability of Chinese American businesses to succeed.⁴¹

Woo appears to be a significant individual in the Chinese American business community in Los Angeles. However, his career achievements have taken place within the last 40 to 50 years and it is difficult to assess whether enough time has passed for his achievements to gain significance and what the lasting implications of his work will be.⁴² Furthermore, the subject building most represents his early career, when he co-managed the Chungking Produce Company with his father. It does not have a connection with Woo and his later business achievements, so it is not associated with the most productive period of his business career. There may be another building in the city, such as the Cathay Bank building downtown (constructed in 1965), that more accurately reflects his significance and contributions to the business community. The building is not significant under Criterion B for its association with Woo or any of the other aforementioned individuals.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building is a typical example of an industrial building; it does not embody the distinctive characteristics of a particular type or period, as its construction or design details do not represent a

⁴⁰ *Chinese Historical Society of Southern California, "Los Angeles Chinese American Banking Pioneers,"* <http://www.chssc.org/honorees/2007/2007honorees-5.htm> (accessed September 27, 2012).

⁴¹ *UCLA Anderson School of Management, "Wilbur K. Woo,"* <http://www.anderson.ucla.edu/x34449.xml> (accessed September 27, 2012).

⁴² *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* states that "properties associated with living persons are usually not eligible for inclusion in the National Register. Sufficient time must have elapsed to assess both the person's field of endeavor and his/her contributions to that field. Generally, the person's active participation in the endeavor must be finished for this historic perspective to emerge" (page 16).

particular period. It is a typical reinforced concrete building and does not embody the distinctive characteristics of a method of construction. It is not significant under this aspect of Criterion C.

The building's original permit was not found, so it was not possible to determine if it is the work of a master architect or builder. However, as it is a common example of an industrial building from the early 1920s, it is unlikely that it is the work of a master, though it is not possible to determine this for certain. The building does not appear to be significant under this aspect of Criterion C.

The building was expanded in 1925, and architect Frank L. Stiff designed the addition. Stiff was a Los Angeles architect who designed commercial buildings. His work includes the Kay Bee Block (1913) at 420 Boyd Street in downtown Los Angeles, the Safeway Market (1939) at 3909 Sunset Boulevard (later the home of the Black Cat Bar) in the Silver Lake neighborhood of Los Angeles, and the Leimert Park Safeway store (1939) at the southwest corner of Leimert Boulevard and West 43rd Street.⁴³ Stiff does not appear to be what could be considered a master architect, as his body of work appears to have been relatively small and tended to be modest in scale and design. Furthermore, the work designed by him for the subject building included an addition and could not be considered a significant example of his work. The building does not appear to be significant as the work of a master.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated as an individual property, this aspect of Criterion C does not apply.

Therefore, the building is therefore not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the building has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. The setting when it was constructed was comprised of low-rise industrial buildings, including the original City Market complex, which no longer remains. This has greatly impacted the immediate setting of the building, as it is located directly adjacent to (and on the same parcel as) the original City Market buildings. The building therefore no longer retains integrity of setting. The building retains its integrity of design, as it has not been greatly altered and retains its original scale and massing. Approximately two-thirds of the original market stall bays have been boarded over or replaced with metal roll-up doors, but this has not significantly impacted the building's overall design. The building's integrity of materials and workmanship has been compromised but not completely negated by the

⁴³ "Store Chain Opens Leimert Branch," *Los Angeles Times*, February 4, 1940, page E2.

replacement of the original market stalls with non-original metal roll-up doors. The building retains its integrity of feeling, as it still feels like an industrial building from the 1920s. The building is not significant under Criteria A or B, so there is no relevant association to evaluate.

In conclusion, although the building retains the majority of the seven aspects of integrity, it is not significant under any of the four established National Register criteria. It is therefore not eligible for the National Register.

Building 4: 1102 San Julian Street (APN 5145-025-001)

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The contexts considered in this evaluation were the development of the wholesale produce industry and the history of Japanese and Japanese Americans in Los Angeles. It should be noted that these two contexts are somewhat intertwined given the important role Japanese and Japanese American played in the development of the wholesale produce industry.

City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, south of 9th Street and just north of 11th Street. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. Additional buildings were constructed south of 11th Street, which stood among buildings used for other uses and properties owned by other companies. Much of the original City Market complex has been demolished.

Building 4A was constructed in 1925 when City Market was expanding to the south. It does not effectively convey the wholesale produce market property type or the history of City Market on its own. Therefore, it is not significant under Criterion A for an association with this context.

City directories indicate that the building was occupied by Japanese or Japanese American owned wholesale produce companies beginning at least in 1938 (this is the earliest city directory listing found for the building). Seibei M. Miura had a wholesale produce business in the building at this time, and also had one located at 722 South Central Avenue. A later occupant of the building was Kushi A.K. Produce, whose name indicates that it may have been owned and operated by Japanese or Japanese Americans, but this is not known for certain. Although the building's occupants place it within the history of the Japanese/Japanese American community around City Market and their contribution to the wholesale produce industry, there is no evidence that these businesses were significant within the community or the wholesale produce industry at large. They were among the many wholesale produce businesses located in Los Angeles and do not appear to have been significant Japanese businesses in any way. Association with an ethnic group does not in and of itself constitute significance. Therefore, the building is not significant under Criterion A in the context of the history of Japanese or Japanese Americans in Los Angeles.

Building 4B was constructed in 1948, likely when the business in the other building on the parcel was expanding. It is a typical warehouse building, however, and reflects the expansion of the businesses located on the parcel, rather than the expansion of City Market itself, which by the 1940s was largely built out to its fullest extent. Therefore it does not appear to be significant in either context considered under Criterion A.

Criterion B – Building 4A was evaluated for its potential association with the lives of persons significant in our past. City Market, whose president at the time was Edward J. Fleming, constructed the building. While Fleming was associated with the establishment of City Market as a whole, there is no evidence that he was directly associated with this building in particular. By 1938, Seibei M. Miura owned a produce market at this location as well as on Central Avenue. Research did not indicate that Miura made a significant contribution to the history of the nation, state, or city.

By 1942, Pioneer Produce Sales Corporation occupied the building. By 1956, the occupant was Kushi A.K. Produce, which remained in the building until at least 1969. The building was occupied by Lloyd's Produce by 1973. The building is more closely associated with these businesses, rather than individuals. The property does not appear to be significant under Criterion B.

Building 4B was associated with Building 1A. It was likely utilized by the companies listed above, and it is more likely that the building was more closely associated with these businesses rather than a particular individual. Therefore, it does not appear to be significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

Building 4A is a typical industrial building constructed in no particular style. It does not embody the distinctive characteristics of a type, period, or method of construction, as it is a typical industrial building from the 1920s. It does not possess any characteristics that make it distinctive from other industrial buildings in the city constructed during the same period. It is not significant under this aspect of Criterion C.

The architect for the building was H.M. Merrell and Company, and the builder was Edward L. Fleming. Research did not indicate that either Merrell or Fleming was a master architect or builder. Therefore, the building is not significant under this aspect of Criterion C.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply. For the reasons detailed above, the property is not significant under Criterion C.

Building 4B is a typical warehouse building. It is constructed in no particular style and is similar to warehouse buildings constructed during much of the 20th century. It is a typical board-formed concrete building. It therefore does not embody the distinctive characteristics of a type, period, or method of construction. The original building permit was not found, but the building's utilitarian, common design leads to the conclusion that it was likely not the work of a master. It is not likely significant under these first aspects of Criterion C.

The building does not articulate a particular concept of design or express an aesthetic ideal, as it is merely a typical, utilitarian warehouse building. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the building is not part of a historic district and is being evaluated as an individual property, this aspect of Criterion C does not apply. For the reasons detailed above, Building 4B is not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the property has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – Building 4A was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building remains in its original location, so it retains integrity of location. The surrounding setting remains largely comprised of low-rise commercial and industrial buildings from the 1910s through the 1940s.⁴⁴ However, the buildings across the street (the original City Market complex) have been largely demolished, impacting the building's more immediate setting. Since the building was located directly adjacent to the original market complex (they were only separated by a street), the original buildings would have been a key feature of its surrounding setting. It is especially evident in this case that the building no longer stands as part of a larger collection of industrial buildings, as it originally did when it was constructed. Therefore, it does not retain its integrity of setting.

The building's primary elevations have been altered; the bays that are now filled in with storefronts would have likely featured bi-fold or roll-up doors. The existing storefronts were installed within the last 10 or 20 years, and they dominate the building's primary elevations. Although the building is recognizable as having been constructed in the 1920s, its original design is no longer intact. These alterations have also impacted a majority of the building's materials. Therefore, the building no longer retains its integrity of design, materials, or workmanship, since it more accurately reflects the design, materials, and workmanship of the last 10 or 20 years, rather than those of 1925. The building no longer retains its integrity of feeling, as it originally functioned as an industrial building (a market) and now functions as a commercial building with storefronts. It no longer conveys its original use. The building is not significant

⁴⁴ *Limited information was available on the area surrounding City Market. Sanborn maps from 1909 and 1950 give a broad sense of the area's development but not of the area's makeup in the 1920s when City Market was expanding. The area was largely residential in 1909, and by 1950, it had transitioned into a commercial area. Information was gleaned from these maps and historic aerials, but these do not cover the period of the 1920s and 1930s. Therefore, assessor data and construction dates of surrounding buildings were utilized to get a sense of when the surrounding area developed.*

under Criteria A or B so there is no relevant association to evaluate. The building therefore retains two of the seven aspects of integrity, and does not retain sufficient integrity for eligibility for the National Register, regardless of any significance it may or may not have.

Building 4B was also examined against the seven aspects of integrity. It has not been moved, so it retains its integrity of location. The surrounding setting's makeup remains similar to what it would have been when the building was constructed in 1948 – comprised of low-rise commercial and industrial buildings. However, the majority of the original City Market buildings that existed when the building was constructed no longer remain, so the integrity of its immediate setting no longer remains. The building does not retain this aspect of integrity. The building does not appear to have been heavily altered, so it retains its integrity of design, materials, and workmanship. The building continues to feel like an industrial building from its period, so it retains integrity of feeling. It is not significant under Criteria A or B, so there is no relevant association to evaluate.

In conclusion, the first building no longer retains the majority of the seven aspects of integrity and was not found to be significant under any of the four established National Register criteria. The second building retains the majority of its applicable aspects of integrity, but it not significant under any of the four National Register criteria. Therefore, neither building is eligible for listing on the National Register.

Building 5: 1122 San Julian Street (APN 5145-025-002)

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The context considered in this evaluation was the development of the wholesale produce industry in Los Angeles.

City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, between 9th and 11th Streets. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. The subject building is one of a number of buildings constructed by City Market as it expanded. These additional buildings south of 11th Street stood among buildings used for other uses and properties owned by other companies. Much of the original City Market complex has been demolished.

The building at 1122 San Julian Street was constructed in 1928 by City Market and was occupied by a variety of produce wholesalers and distributors. The market expanded in the 1920s and purchased land south of 11th Street that originally belonged to developer O.W. Childs. The building was constructed in the midst of the market's expansion period but does not effectively convey the wholesale produce market property type or the history of City Market on its own. Therefore, it is not significant under Criterion A for an association with this context.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

The building was originally owned by City Market, whose president at the time was Edward J. Fleming. While Fleming was associated with the establishment of City Market as a whole, there is no evidence that he was directly associated with this building in particular. The building was one of many constructed by City Market while he was president. Occupants of the building were wholesale produce businesses. Numerous individuals associated with these companies would have worked in the building. There is not one particular person associated with the building in connection with its occupants. Therefore, it is not significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building at 1122 San Julian Street is an excellent intact example of a wholesale produce building from the 1920s. This property type was typically constructed by small independent brokers, but in this case it was constructed by City Market. The building embodies the distinguishing characteristics of the type in that the ground floor has an open floor plan for the storage of produce with loading bays to send and receive commissions. Many of the bays retain their original wood bi-fold doors. The second floor also contained a storage area as well as a small office area for the tenants. The original steel sash windows remain on the second story. The building stands out among the other wholesale produce buildings in the area by virtue of its integrity. While there were once many examples of the property type in the area, now there are few. The majority of those that remain have been converted to commercial uses related to the fashion industry. In so doing, they have been stripped of the distinctive features of produce buildings. Therefore, the building is significant under this aspect of Criterion C.

The original building permit was not found, so it was not possible to identify the architect or builder. The building is not likely the work of a master architect, as it is a common example of its type and style and is similar to numerous other industrial buildings in the city from the same period. Therefore, it is not likely that the building is significant as the work of a master.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply. Therefore, the building is not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the property has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. Its surrounding setting remains comprised of low-rise commercial and industrial

buildings; it remains similar to the setting that existed when the building was constructed. Therefore, it retains integrity of setting. The building has been minimally altered from its original appearance, so it retains its integrity of design, materials, and workmanship. It continues to function as an industrial building and retains its integrity of feeling. Lastly, as the building is not significant under Criteria A or B, there is no relevant association to evaluate.

In conclusion, the building is eligible under National Register Criterion C as an excellent intact example of a wholesale produce building that retains all applicable aspects of integrity.

Building 6: 1142 San Julian Street (APN 5145-025-004)

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The context considered in this evaluation was the development of downtown Los Angeles, particularly the eastside wholesale and retail district.

The building was likely constructed for the Los Angeles Drug Company, who owned the building in 1926, one year after it was built, and also owned the building next door (1136 San Julian Street, constructed in 1926). The company utilized both buildings as warehouse space and remained in the building until at least 1950, according to Sanborn Fire Insurance Maps. By 1954, the building housed several divisions of the A.C. Weber and Company, a sewing machine producer. Research did not reveal any information about these two companies to indicate they could be considered significant companies in the history of Los Angeles.

The building was constructed during the 1920s when industrial and commercial buildings replaced the residential buildings in the area around City Market. However, the subject building is one of numerous buildings constructed during the period. It does not appear to be one of the earliest industrial buildings constructed in the area; there are a small number of extant commercial and industrial buildings in the vicinity that date to the first decade of the 20th century. Therefore, it does not represent an early pattern of development, but is rather part of a larger trend that occurred in the area during the 1920s. Therefore, it is not significant under Criterion A for its association with the development of the area.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

The building does not appear to have been associated with the lives of any particular individuals, but rather two companies, namely the Los Angeles Drug Company and A.C. Weber and Company. It was likely constructed by the Los Angeles Drug Company, a drug wholesale company, as it occupied the building one year after it was built. The building was a warehouse for the company, as well as for A.C. Weber. No particular individuals appear to have been associated with the building. Therefore, it is not significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building at 1142 San Julian Street is a typical example of an industrial building constructed in the 1920s. It is not constructed in any particular style and is a typical unreinforced masonry building. It does not embody the distinctive characteristics of a type, period, or method of construction. The original building permit was not found, so it was not possible to determine for certain if it was designed by a master architect. However, it is nearly identical in design to the building next door, 1138 San Julian Street, which was designed by master architect Myron Hunt. Hunt was a well-known Los Angeles architect who designed buildings such as the Ambassador Hotel in Los Angeles; the Rose Bowl in Pasadena; and the Huntington Library, Museum, and Residence in San Marino. Although Hunt was a significant architect in Southern California, the building at 1142 San Julian Street, if it was designed by him, is not a notable example of his work. Therefore, it is not significant under this aspect of Criterion C.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply.

The building therefore does not appear to be significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the property has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. The surrounding setting consists of low-rise commercial and industrial buildings, which is what the setting consisted of in the 1920s, when the building was constructed. Therefore, it retains its integrity of setting. The building's storefronts have been altered and a parapet may have been removed, but otherwise alterations are minimal. The building therefore retains its integrity of design, materials, and workmanship. The building no longer retains its integrity of feeling, as it no longer conveys the sense of an industrial building constructed during the 1920s but rather feels like a commercial building due to its storefront alterations. The building's original first story appearance is unknown, but as it was utilized as a warehouse, it may have had roll-up or bi-fold doors. The storefronts present today give the building the appearance of a commercial building, rather than an industrial building. As the building is not significant under Criteria A or B, there is no relevant association to evaluate.

In conclusion, although the building retains the majority of its aspects of integrity, it does not appear to be significant under any of the four established National Register criteria. Therefore, the building is not eligible for listing on the National Register.

Building 7: 1146 San Julian Street (APN 5145-025-005)

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The context considered in this evaluation was the development of the downtown Los Angeles, particularly the eastside wholesale and retail district.

The building was constructed in 1926 and owned by the Los Angeles Drug Company. It was utilized as a warehouse. The building was constructed during the 1920s when commercial and industrial buildings replaced the residential buildings in the area around City Market. However, the subject building is one of numerous constructed during the period. It does not appear to be one of the earliest industrial buildings constructed in the area; there are a small number of extant buildings in the vicinity that date to the first decade of the 20th century. Therefore, it does not represent an early pattern of development, but is rather part of a larger trend that occurred in the area during the 1920s. Therefore, it is not significant under Criterion A for its association with the development of the area.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

The building was constructed by the Los Angeles Drug Company. They occupied it until at least 1950 and used it as a warehouse. The offices of the Los Angeles Drug Company, a wholesaler, were at 1136 San Julian. This is one of three neighboring buildings the company owned and operated out of at the time. By 1956, the building was occupied by various clothing manufacturing companies. This remained the case until at least 1987. The building is more closely associated with these companies rather than a particular individual. Therefore, it does not appear to be significant under Criterion B for an association with the lives of persons significant in our past.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building is a typical example of an unreinforced masonry industrial building from the 1920s. It was not constructed in any particular style. It is a common example of its type and method of construction, and it is a typical representation of its period of construction. Therefore, it is not significant under this aspect of Criterion C. The original building permit was not found, so it was not possible to determine if the building was designed or constructed by a master architect or builder. The building is a typical industrial building from the time period, so it is not likely the work of a master, but this is not certain.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply. The building is not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the property has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. The surrounding setting consists of low-rise commercial and industrial buildings, which comprised the surrounding setting in the 1920s when the building was constructed, although the development appears to be denser now than it was in the 1920s. The building retains its integrity of setting. The building’s first story has been altered to contain storefronts but the openings have not been resized; the original appearance is unknown, but it may have originally contained bi-fold or roll-up doors, given that it functioned as a warehouse. Signage has also been added, but no other alterations are observed. The building retains its integrity of design.

There have been no extensive changes to the original materials beyond the alterations to the storefronts. Therefore, the building retains integrity of materials and workmanship. The building’s integrity of feeling has been compromised, as it feels now like a commercial building, rather than an industrial building. The building is not significant under Criterion A or B, so there is no relevant association to evaluate.

In conclusion, although the property at 1146 San Julian Street retains nearly all of the applicable aspects of integrity, it is not significant under any of the four established criteria for listing in the National Register. It does not appear to be eligible for listing on the National Register.

Structure 8: 1150 San Julian Street (APN 5145-025-006)

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The context considered in this evaluation was the development of the wholesale produce industry in Los Angeles.

City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, between 9th and 11th Streets. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. Additional buildings were constructed south of 11th Street, which stood among buildings used for other uses and properties owned by other companies. Much of the original City Market complex has been demolished.

The construction of loading docks like the one at 1150 San Julian Street by City Market reflects the changing dynamics of the market. It reflects the transition from goods being transported by horse and carriage to them being transported by automobile (namely, trucks). Additional loading docks were constructed in the courtyard between the original City Market buildings in 1946. While the structure represents the evolution of City Market, it does not effectively convey the history of City Market on its own. Therefore, it is not significant under Criterion A for an association with this context.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

City Market constructed the loading dock in 1937. At the time of construction, the president of City Market was Edward J. Fleming. While Fleming was associated with City Market, there is no evidence that he had any direct association with this structure. Therefore, the structure is not significant for an association with him. There are no other known persons associated with the loading dock. It did not have occupants and would have served only as a loading and unloading point for trucks. Therefore, it is not significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The structure is a typical example of a loading dock. It was constructed in 1937, but it is not necessarily identifiable as a structure from the 1930s. It could have been constructed at another time and would likely have had the same or a very similar appearance. It does not possess any distinguishing characteristics of a type or period. The dock is constructed of concrete and metal, and does not represent any particular advances in engineering or construction. It does not possess the distinguishing characteristics of a method of construction. Therefore, it is not significant under this aspect of Criterion C.

Engineer Austin M. Hill designed the structure. Hill worked for the Bureau of Right of Way and Land by the 1950s, and was director of the Bureau in the 1960s. He does not appear to have been significant as a master engineer. The structure therefore is not significant under this aspect of Criterion C.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject structure is a typical example of a loading dock from the mid-20th century and it does not express an aesthetic ideal or design concept to a greater extent than any other structure of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject structure is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply.

In conclusion, the structure at 1150 San Julian Street is not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the property has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The structure was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The structure has not been moved, so it retains its integrity of location. The surrounding setting consists of low-rise commercial and industrial buildings, the majority of which date from the 1920s and 1930s. The setting remains similar to what it would have been when the loading dock was constructed in 1937. Therefore, the structure retains its integrity of setting. It

does not appear to have been altered to a great degree, save for the construction of additional loading space in 1955, and its materials have not been altered from the original ones. Therefore, it retains its integrity of design, materials, and workmanship. It still retains its integrity of feeling, as it has not been significantly altered and still feels like a loading dock from its period of construction. It is not significant under Criteria A or B, so there is no relevant association to evaluate.

In conclusion, the structure, despite retaining all applicable aspects of integrity, is not eligible for listing on the National Register due to lack of significance under any of the four established criteria.

Building 9: 1051–53 South San Pedro Street (APNs 5145-018-007 and 5145-018-008)

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The contexts considered in this evaluation were the development of the wholesale produce industry and the history of Japanese and Japanese Americans in Los Angeles. It should be noted that these two contexts are somewhat intertwined given the important role Japanese and Japanese Americans played in the development of the wholesale produce industry.

City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, south of 9th Street and just north of 11th Street, adjacent to the site of the subject building. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. As it expanded, it acquired the land the subject building is located on from developer O.W. Childs. Much of the original City Market complex has been demolished. The subject building was constructed in 1922 and 1925 when City Market was expanding to the southwest. It does not effectively convey the wholesale produce market property type or the history of City Market on its own. Therefore, it is not significant under Criterion A for an association with this context.

The building was occupied at the end of the 1920s by a Japanese-owned produce distribution company, United Distributors, and by Jobbers Daily Wholesale Produce (owned by George Shimoda) by 1938. It therefore fits within a larger context of the wholesale produce industry in Los Angeles, as Japanese and Japanese Americans maintained a prominent presence in the industry during the later 19th and early 20th centuries. This prominence was not affected until the internment of Japanese and Japanese Americans in 1942. The building was occupied by Japanese-owned businesses until internment. It was occupied by Balsano Produce Company in 1942. No evidence was found that United Distributors or Jobbers Daily Wholesale Produce were significant companies during the period. Therefore, the building is not significant under Criterion A in the context of the history of Japanese and Japanese Americans in Los Angeles.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

City Market constructed the building in 1922. The president at the time was Edward Fleming. While Fleming was associated with the establishment of City Market as a whole, there is no evidence that he was associated with this building in particular.

The building is most closely associated with businesses, including United Distributors, Jobbers Daily Wholesale Produce, Balsano Produce Company, and Elite Produce Company. United Distributors was owned by K. Saito, J. Mori, and M. J. Okamoto. There is no evidence that Saito, Mori, or Okamoto were significant at the national, state, or local levels. The building is not significant for an association with them.

The other businesses located in the building were not located in the building for more than five to ten years. Numerous individuals associated with these companies would have worked in the building. There is not one particular person associated with the building. Therefore, the building is not significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building is a typical example of an industrial building from the 1920s and is constructed in no particular style. It does not embody any particularly distinctive characteristics of a type, period, or method of construction, as it is a typical industrial building from its period and is constructed of board-formed concrete, a common construction technique. It is not significant under this aspect of Criterion C.

Architect A.P. Ackinson designed the building. There is no evidence that Ackinson was a significant architect and could be considered a master. The building is not significant under this aspect of Criterion C. The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply.

The building is not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the building has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. It no longer retains its integrity of setting, as the original City Market buildings, which were located directly adjacent to the subject building when it was constructed, no longer remain to

a large extent. In addition, the building across the street on the other side of South San Pedro Street was constructed in 1995 and dominates the immediate setting. The building has been heavily altered, including the replacement of windows, addition of non-original doors, and covering of original storefronts. It therefore no longer retains its integrity of design, materials, or workmanship. It retains its integrity of feeling, as it still is recognizable as an industrial building from its period, despite its alterations. The building was not found to be significant under Criteria A or B, so there is no relevant association to evaluate.

In conclusion, the building at 1051–1053 South San Pedro Street was not found to be significant under any of the four established National Register criteria, and no longer retains the majority of the seven aspects of integrity. The building is therefore not eligible for the National Register.

Building 10: 1101 South San Pedro Street (APN 5145-025-007)

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The contexts considered in this evaluation were the development of the wholesale produce industry and the history of Japanese and Japanese Americans in Los Angeles. It should be noted that these two contexts are somewhat intertwined given the important role Japanese and Japanese Americans played in the development of the wholesale produce industry.

City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, south of 9th Street and just north of 11th Street. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. Additional buildings were constructed south of 11th Street, which stood among buildings used for other uses and properties owned by other companies. Much of the original City Market complex has been demolished. The subject building was constructed in 1930, towards the end of City Market's expansion period. It does not effectively convey the wholesale produce market property type or the history of City Market on its own. Therefore, it is not significant under Criterion A for an association with this context.

The building housed the Venice Celery Distributors, whose president was Eizo Maruyama. The company likely occupied the entire building given the fact that no other businesses are listed in the city directories at this address. The company's office was located here, and the building probably also served as its warehouse given the size of the space. The company remained in the building until at least 1942, when Japanese citizens were relocated to internment camps and had to give up or sell their businesses.

Venice Celery Distributors appears to have been a prominent Japanese-owned company in the pre-war period. Johnny Young, a Chinese American who grew up in the area around City Market, noted that upon internment, the Japanese "lost everything. A lot of these big places. Venice celery. Lot of big produce

down there owned by Japanese.”⁴⁵ By 1944, the building was owned by Henry Wu. The company was likely associated with the Venice Celery Farmers Association, of which Maruyama was a member. The Venice Celery Farmers Association was a growers association comprised of farmers from Venice, Culver City, and the Palms area of Los Angeles. Celery was one of the primary crops cultivated by the Japanese in Southern California, and Venice and its vicinity was known as “celery country”.⁴⁶ It appears that Venice Celery Distributors acted as the wholesale produce company for the farms in the area represented by the Association, indicating it may have been a significantly-sized distribution company in West Los Angeles.

Further research was attempted to determine the significance of Venice Celery Distributors, but no further information was found to give more details on the company’s significance in the pre-World War II period, although it appears to have been significant. Given the available information, the building at 1101 South San Pedro Street appears to be significant under Criterion A for its association with this Japanese-owned produce company in the pre-World War II period.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past. The property was constructed in 1930. The president of City Market at the time was Edward J. Fleming. However, there is no known association between Fleming and the building at 1101 South San Pedro. The building was one of many constructed by City Market while Edward Fleming was president. It is not significant under Criterion B for its association with him.

The building is more closely associated with the businesses it housed, including Venice Celery Distributors, E & L Fruit and Produce Distributors, and Gilbert Nut Company. Numerous individuals would have been associated with these businesses, including Eizo Maruyama, president of Venice Celery Distributors until at least 1939 (he was no longer president by 1942). In 1942, Eizo Maruyama was listed as being a member of the Venice Celery Farmers Association and director of the Greater Japan Agricultural Society, North American Branch.⁴⁷ He was a leader in the Japanese community, forming the Venice-Palms Japanese Language School along with Tomohei Mikawa in 1924. The Venice Celery Association donated money to the language school.⁴⁸ Maruyama was honored in March 1969 with the Sixth Order of the Sacred Treasurer from the Japanese government. Other recipients of the award included Saburo Kido, a Hawaiian-born attorney involved with the Japanese American Citizens League,

⁴⁵ *Fickle*, p. 12.

⁴⁶ *Calisphere*, “Regenerations Oral History Project: Rebuilding Japanese American Families, Communities, and Civil Rights in the Resettlement Era – Los Angeles Region, Volume II,” <http://content.cdlib.org> (accessed September 14, 2012).

⁴⁷ *Internet Archive*, *Investigation of Un-American Propaganda in the United States. Hearings Before a Special Committee on Un-American Activities, Appendix VI, 77th Cong., 1st sess., 1942*, http://archive.org/stream/investigationofu06unit/investigationofu06unit_djvu.txt (accessed August 27, 2012).

⁴⁸ *Tiffany Yoshikawa*, “Start of the Venice Japanese Community Center,” *Venice Japanese Community Center, Inc.*, http://www.vjcc.com/inside_10-07.htm (accessed August 27, 2012).

and Miyosaku Uyematsu, who owned a plant nursery in Montebello and donated cherry blossom trees to Griffith Park.⁴⁹

The building at 1101 South San Pedro Street contained the offices and distribution center for Venice Celery Distributors, of which Maruyama was president. The offices of the company were located in the building for approximately ten years. Maruyama was a significant member of the Japanese community during the mid-20th century. The building that held his offices represents a significant aspect of his life and his contributions to the Japanese and Japanese American community in Los Angeles, as the community's history is so closely tied to that of the produce industry. Furthermore, his role as president of Venice Celery Distributors and member of the Venice Celery Farmers Association allowed him to positively impact his community in the ways that he did. Therefore, the building is significant under Criterion B for its association with Eizo Maruyama.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building at 1101 South San Pedro Street is a typical board-formed concrete industrial building from the 1930s. It was constructed in no particular style. It does not embody any particularly distinctive characteristics of a type, period, or method of construction; therefore, it is not significant under this aspect of Criterion C.

The building was designed by engineer Austin M. Hill, who did work on one other City Market building and designed the loading dock at 1150 San Julian Street in the late 1930s. Hill worked for the Bureau of Right of Way and Land by the 1950s, and was director of the Bureau in the 1960s. Nevertheless, he does not appear to have been significant as a master engineer. Therefore, the building is not significant under this aspect of Criterion C.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply. Therefore, the building is not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the building has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

⁴⁹ *Toyo Miyatake Studio/Rafu Shimpō Collection, "Recognition banquet honoring Miyosaku Uyematsu, Saburao Kido, Eizo Maruyama at San Kwo Low restaurant, Los Angeles, California, March 15, 1969," Japanese American National Museum, <http://www.janm.org/collections/item/96.267.1054/> (accessed August 27, 2012).*

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. The building’s setting has been altered, as the buildings directly across San Pedro Street were constructed within the last 30 years. They are dominant on the landscape and have altered the surrounding setting of the building. Therefore, the building no longer retains integrity of setting. The building no longer retains integrity of design, materials, or workmanship, as the building’s storefronts and windows have been replaced. They would have likely been bi-fold doors and the windows would have been wood or steel sash. It now has aluminum storefront doors and a combination of metal and vinyl windows. The building no longer retains its integrity of feeling, as it no longer feels like a wholesale produce building from 1930. It now feels like a retail building from a later period due to its alterations. The building no longer retains its integrity of association. Although it appears to be significant under Criterion A for its association with Japanese contributions to the wholesale produce industry and a significant Japanese produce business and it is significant under Criterion B for its association with community leader Eizo Maruyama, the original use of the building is no longer discernable because of the alterations. It no longer retains its historic character, so it cannot physically convey the reasons for its historic significance. Therefore, it no longer retains integrity of association.

In conclusion, although the building is significant under Criterion A for its association with a prominent Japanese-owned wholesale produce company and under Criterion B for its association with Maruyama, it no longer retains sufficient integrity to convey that significance. Therefore, it is not eligible for the National Register.

Building 11: 1105 South San Pedro Street (APN 5145-025-008)⁵⁰

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The contexts considered in this evaluation were the history of the wholesale produce industry in Los Angeles and the history of Chinese and Chinese Americans in Los Angeles.

It was not possible to determine if the building was owned and constructed by City Market, as the original building permit was not found. The earliest owner found was California Bank in 1927. Based upon the permit history, it is known that City Market owned the building by 1947. It is not known if City Market constructed the building or purchased the building after construction. Beginning in the 1930s, City Market owned this building and several others along this block of South San Pedro Street.

Regardless of original ownership, City Market’s ownership of this building reflects its expansion to this block of South San Pedro Street beginning in the 1930s and continuing into the 1950s (the buildings nearby at 1119, 1125, and 1127 South San Pedro Street were owned by City Market by the 1930s). The other buildings along this block may have been owned by City Market in the 1930s, as the building at 1101 South San Pedro was constructed by City Market in 1930, but it was not possible to determine this through the research conducted.

⁵⁰ *The building at 1105 South San Pedro Street shares a parcel with three other buildings with the posted addresses: 1109-13, 1117, and 1119 South San Pedro Street.*

City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, south of 9th Street and just north of 11th Street, adjacent to the site of the subject building. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. As it expanded, it acquired the land the subject building is located on from developer O.W. Childs. Much of the original City Market complex has been demolished. The subject building was constructed c.1924 when City Market was expanding to the southwest. It is unknown if the building was originally constructed by City Market but it is likely that it was or was at least purchased by them soon after construction, given that City Market was expanding into this block of South San Pedro in the 1930s. However, the building does not effectively convey the wholesale produce market property type or the history of City Market on its own. Therefore, it is not significant under Criterion A for an association with this context.

The earliest known occupant of the building was Jue Joe Company, a produce merchant. Jue Joe Company was utilizing the building by 1932 and remained in the building until at least 1956. The company was the longest occupant of the building and appears to have been a significant wholesale produce company in the industry in the mid-20th century. A discussion of the company appears in the *Los Angeles Times* in 1934, and the Jue Joe Ranch in Van Nuys remains extant (the residence was constructed in the 1940s by his son on the site of the original ranch). The article noted that he sold asparagus “not only in his own local market but broadcast through the country.”⁵¹

Earlier, in 1925, Joe was noted as being “one of the most successful farmers in this district [Fillmore]” and grew potatoes and tomatoes.⁵² Joe was one of the directors of the San Fernando Valley Asparagus Marketing Association by 1925 and was referred to as one of the “well-known Chinese [growers] in the valley, most of them being business men of excellent ability.”⁵³ He was noted as planning “soon to make a thorough inspection of the lands in Imperial Valley with the idea of forming a Chinese company for extensive farming in that region.”⁵⁴ It is not known if he pursued that business opportunity, but it gives an indication that his business was an important one in the local produce industry. The company owned by Jue Joe therefore appears to have been significant within the context and history of Chinese-owned produce companies in Los Angeles.

The building is significant for its association with Jue Joe Company, a significant Chinese-owned produce company from the 1920s through at least the 1950s. The company is also associated with 780 South Central Avenue, in the produce market at 7th Street and Central Avenue. It was located here from 1927 until at least 1929, a much shorter period of time, and is more directly associated with the subject building. The company appears to have been significant within the produce industry in Los Angeles by the 1920s and remained so until after Jue Joe’s death in 1941.

⁵¹ John Steven McGroarty, “The Market That Feeds the West,” *Los Angeles Times*, June 3, 1934, p. H6.

⁵² “Farm News of the Great Southwest,” *Los Angeles Times*, September 13, 1925, p. K4.

⁵³ “Asparagus Grower Tells of Profits,” *Los Angeles Times*, October 12, 1925, p. 6.

⁵⁴ “Daddy Welcomes Family From Across the Seas,” *Los Angeles Times*, July 1, 1918, p. I12.

The building is therefore significant under Criterion A for its association with Jue Joe Company and the wholesale produce industry in Los Angeles, as well as for its association with a Chinese-owned produce company.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past. The building is associated with Jue Joe, whose produce commission company occupied the building from at least 1932 until at least 1956.

Based upon the research conducted, Jue Joe appears to have been a significant individual in the context of the produce and agricultural industry in Los Angeles, especially that of the San Fernando Valley. Jue Joe was referred to in a *Los Angeles Times* article as “the asparagus king.” Joe was a Chinese immigrant who came to Los Angeles and established an asparagus farm, owning approximately 700 acres of agricultural land by 1934.⁵⁵ As early as 1918, he was referred to as a “well-known Chinese merchant and marketman.”⁵⁶ He owned land in the San Fernando Valley, in the vicinity of Van Nuys. He passed away in 1941. Joe was described as “one of the first produce merchants in the San Fernando Valley” in his obituary in 1941; the article notes that “he was known widely throughout the San Fernando Valley as one of the leading produce merchants.”⁵⁷

Jue Joe lived at 814 East 27th Street in 1927, according to city directories. Also associated with Joe was the family’s ranch in Van Nuys (the extant residence was constructed by Joe’s son in the 1940s after his death). Research indicates that Joe’s significance in the context of the produce industry in the Los Angeles area is more directly tied to the San Fernando Valley than the City Market vicinity. However, the building at 1105 South San Pedro Street is a better remaining representation of Joe’s significance, as the ranch remaining in Van Nuys was constructed by his son after his death in 1941. The residence on 27th Street may have been a temporary home and it is unclear how long Joe lived there. The building at 1105 South San Pedro Street therefore is most directly associated with Joe and his significance within the wholesale produce industry. It is significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building is a typical example of an industrial building constructed in the 1920s. It does not possess any distinguishing characteristics of a type, period, or method of construction. It is not significant under this aspect of Criterion C. The original building permit was not found, so it was not possible to determine if the building had a well-known architect or builder. The building is a typical industrial building, however, so it is unlikely that it was designed by a master. It does not appear to be significant under this aspect of Criterion C.

⁵⁵ McGroarty, “The Market That Feeds the West,” p. H6.

⁵⁶ “Daddy Welcomes Family From Across the Seas,” p. I12.

⁵⁷ “Obituary – Jue Joe,” *Los Angeles Times*, March 2, 1941, p. 20.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the property has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. Since the building has not been moved, it retains its integrity of location. The building’s setting has been altered by the construction of a large commercial building directly across the street in 1995. The building replaced low-rise buildings devoted to automobile storage and repair. The setting has therefore been substantially altered and no longer remains.

The building, which has few design elements, has been altered to such a degree that it no longer retains integrity of design. The addition or replacement of the roll-up doors, one of them containing a metal pedestrian door, has fundamentally impacted the building’s original design, materials, and workmanship. The primary elevation may have contained roll-up doors, but they would have been constructed of wood. The building therefore no longer retains integrity of design, materials, and workmanship. Since the building originally did not contain many design elements, its alterations have had a greater impact on its original design and materials than those same alterations might have had on a building of more complex design. The building no longer retains integrity of feeling, as it feels like a more modern building due to the alterations on the primary elevation. Although it is significant under Criteria A and B, it no longer retains integrity of association due to its alterations, which have made it feel like a more modern building and have eliminated those elements of the building that make it feel like an industrial building from the 1920s.

In conclusion, although the building is significant under Criterion A and B for its association with Jue Joe and his wholesale produce company, it no longer retains the majority of its aspects of integrity. It is therefore not eligible for listing on the National Register.

Building 12: 1109-13 South San Pedro Street (APN 5145-025-008)⁵⁸

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The contexts considered in this evaluation were the development of the wholesale produce industry in Los Angeles and the history of Chinese and Chinese Americans in Los Angeles.

⁵⁸ *The building with the posted address of 1109-13 South San Pedro Street shares a parcel with three other buildings with the posted addresses: 1105, 1117, and 1119 South San Pedro Street.*

It was not possible to determine the original owner of the building, as the original building permit was not found. By 1952, it was owned by City Market. It was occupied historically by produce businesses beginning at least in the mid-1930s; by 1973, it was occupied by Bernie's sandwich stand in addition to a produce business.

City Market owned this building and several buildings along this block of South San Pedro Street by the 1940s and 1950s. It is not known if the building was originally owned by City Market; at the very least, City Market was expanding into this block of South San Pedro Street beginning in the 1930s (it owned the buildings nearby at 1119, 1125, and 1127 South San Pedro Street by the 1930s). It is possible that City Market also owned the building at 1109-13 South San Pedro Street in the 1930s, but this is not known for certain. Regardless, the building reflects City Market's history and expansion, as early as the 1950s and potentially earlier.

City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, south of 9th Street and just north of 11th Street, adjacent to the site of the subject building. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. As it expanded, it acquired the land the subject building is located on from developer O.W. Childs. Much of the original City Market complex has been demolished. The subject building was constructed c.1924 when the produce industry in the vicinity was expanding, City Market in particular, though it is not known if City Market constructed the subject building. The building does not effectively convey the wholesale produce market property type or the history of City Market on its own. Therefore, it is not significant under Criterion A for an association with this context.

The building was occupied by Warren Young, a Chinese American produce merchant, in 1936. It is not known how long Young utilized the building. No information was found to indicate that Young's produce business could be considered significant in the context of Chinese and Chinese Americans history in Los Angeles. The building is not significant for an association with this context.

The building is not significant under Criterion A.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

The original owner of the building is not known. By 1952, the president of City Market was either Gertrude D. Fleming or Walter Fleming. Gertrude Fleming is listed as the president of City Market in 1942 and Walter Fleming was the president by 1956. While Gertrude and Walter Fleming were associated with City Market as a whole, there is not evidence that either was directly associated with this building in particular. The building was one of numerous buildings constructed over the course of their presidencies. It is not significant for its association with either Gertrude or Walter Fleming.

The earliest found occupant of the building was Warren Young, a Chinese American produce merchant, in 1936. Young was born in California c.1914, according to the 1940 census. His father, K. Suey Young, is listed as owning a fruit market. Warren is listed as a clerk in the business.⁵⁹ K. Suey Young owned Young Produce Company, located at 1119 ½ South San Pedro Street in 1929, on the same block as the subject building. It is not known how long Warren Young occupied the building. No information was found to indicate that Warren Young could be considered a person significant in our past. The next documented occupant was Pan-Am Distributing Corporation, but no one associated with the company was found in the research conducted.

The building is not significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building is a typical example of an industrial building constructed in the 1920s. It does not possess any distinguishing characteristics of a type, period, or method of construction. It is not significant under this aspect of Criterion C. The original building permit was not found, so it was not possible to determine if the building had a well-known architect or builder. The building is a typical industrial building, however, so it is unlikely that it was designed by a master. It does not appear to be significant under this aspect of Criterion C.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply.

The building is therefore not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the property has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. The building's setting has been altered by the construction of a large commercial building directly across the street in 1995. The building replaced low-rise buildings devoted to automobile storage and repair. The setting has therefore been substantially altered and no longer remains.

⁵⁹ 1940 United States Federal Census, www.ancestry.com (accessed June 19, 2013).

The building has been significantly altered, as it was destroyed by fire in 1999 and largely rebuilt in 2000. It has the appearance and materials of a largely new building and therefore no longer retains integrity of design, materials, or workmanship. It no longer retains integrity of feeling, as it feels like a commercial building rather than an industrial building devoted to usage as a produce warehouse. The building is not significant under Criteria A or B, so there is no relevant association to evaluate.

In conclusion, the building was not found to be significant under any of the four established National Register criteria and no longer retains the majority of its applicable aspects of integrity. It is therefore not eligible for listing in the National Register.

Building 13: 1117 South San Pedro Street (APN 5145-025-008)⁶⁰

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The context considered in this evaluation is the history of the wholesale produce industry in Los Angeles.

The building's original owner and occupants are unknown, as the original building permit was not found. City Market owned the building by 1947. The address was not found in the city directories until 1956. The building was occupied by Anshin S. Produce Company from at least 1956 until at least 1987. The company appears to have been founded by Zalmon (also listed in census records as Salmon) Anshin, who was originally from Russia. He is listed in the 1940 census as a wholesale fruit proprietor. He was a wholesale produce merchant beginning in the late 1920s, according to city directories; the family owned their produce business by 1956. It occupied the building until at least 1987. Although a long-time occupant of the building, Anshin S. Produce Company appears to have been merely one of many produce companies in the city. It does not appear significant in the context of the wholesale produce industry in Los Angeles. No information was found to indicate that Anshin S. Produce could be considered a significant company or made a significant contribution to the history of the wholesale produce industry in Los Angeles. It is not significant under Criterion A in relation to this context.

City Market owned the building by 1947. It may have been owned by City Market earlier than this, but this is not known for certain. City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, south of 9th Street and just north of 11th Street, adjacent to the site of the subject building. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. As it expanded, it acquired the land the subject building is located on from developer O.W. Childs. Much of the original City Market complex has been demolished. The subject building was constructed c.1924 when the produce industry in the vicinity was expanding, City Market in particular, though it is not known if City Market constructed the subject building. By the time City Market is known to have owned the building, the wholesale produce industry in general and City

⁶⁰ *The building with the posted address of 1117 South San Pedro Street shares a parcel with three other buildings with the posted addresses: 1105, 1109-13, and 1119 South San Pedro Street.*

Market in particular were in decline due to changing dynamics in the wholesale produce industry. The building does not effectively convey the wholesale produce market property type or the history of City Market on its own. Therefore, it is not significant under Criterion A for an association with this context.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

The building is associated with Zalmon (or Salmon) Anshin, who owned the Anshin S. Produce Company, the subject building's occupant by 1956. Anshin was originally from Russia and born about 1892. Anshin is listed in city directories and census data as a grocer and wholesale fruit proprietor. No information was found to indicate that Anshin could be considered a person significant in our past. The building is not significant under Criterion B for its association with Anshin.

The president of City Market at the time of the building's construction was Edward J. Fleming. The president of City Market in 1947, the first recorded date of ownership by City Market, was either Gertrude D. Fleming or Walter Fleming. Gertrude Fleming is listed as the president of City Market in 1942 and Walter Fleming was the president by 1956. While Edward, Gertrude, and Walter Fleming were associated with City Market as a whole, there is not evidence that they were directly associated with this building in particular. The building was one of numerous buildings constructed over the course of their presidencies. It is not significant for its association with Edward, Gertrude, or Walter Fleming.

The building is not significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building is a typical example of an industrial building constructed in the 1920s. It does not possess any distinguishing characteristics of a type, period, or method of construction. It is not significant under this aspect of Criterion C. The original building permit was not found, so it was not possible to determine if the building had a well-known architect or builder. The building is a typical industrial building, however, so it is unlikely that it was designed by a master. It does not appear to be significant under this aspect of Criterion C.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply.

The building is therefore not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the property has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. The building’s setting has been altered by the construction of a large commercial building directly across the street in 1995. The building replaced low-rise buildings devoted to automobile storage and repair. The setting has therefore been substantially altered and no longer remains.

The building remains largely unaltered, save for the construction of an addition, presumably to the rear, in 1947 and the addition of the roll-up door in the primary elevation. These changes are not significant, however, and the building’s design remains in keeping with its presumed original appearance. The original door would likely have been a roll-up or wood tilt-up door; the metal roll-up door, though different, is in keeping with the building’s original appearance. The building therefore retains integrity of design.

The replacement of the roll-up door has affected the building’s integrity of materials since the building possessed simple design and materials in its original form. The replacement of what was presumably a wood tilt-up or roll-up door with a metal one has impacted the building’s integrity of materials and workmanship, but has not resulted in a complete loss of these two aspects of integrity. The building retains its integrity of feeling, as it still feels like an industrial building from the 1920s. The building is not significant under Criterion A or B, so there is no relevant association to evaluate.

In conclusion, although the building retains the majority of its applicable aspects of integrity, it is not significant under any of the four established National Register criteria. It is therefore not eligible for listing on the National Register.

Building 14: 1119 South San Pedro Street (APN 5145-025-008)⁶¹

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The contexts considered in this evaluation were the development of the wholesale produce industry in Los Angeles and the history of Chinese and Chinese Americans in Los Angeles.

The building was occupied by a series of produce companies, including Young Produce Company, K&S Jobbers, and Shandler Produce Pack Plant (later called Shapiro-Gilman-Shandler Company). Young Produce Company was owned by K. Suey Young, a Chinese American market owner. K&S Jobbers was a Korean-owned produce business. It occupied the building for approximately 20 years, from at least 1936 to approximately 1965. It was owned by Young Kim, a Korean market owner.

⁶¹ *The building with the posted address of 1119 South San Pedro Street shares a parcel with three other buildings with the posted addresses: 1105, 1109-13, and 1117 South San Pedro Street.*

The building's longest-standing inhabitant was not Chinese-owned but Korean-owned. The building therefore does not fit within the established context related to the history of Chinese and Chinese Americans in Los Angeles. It is therefore not significant in relation to this context.

The building may have been constructed by City Market, but this is not known for certain since the original building permit was not found. City Market owned the building by 1937. City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, south of 9th Street and just north of 11th Street, adjacent to the site of the subject building. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. As it expanded, it acquired the land the subject building is located on from developer O.W. Childs. Much of the original City Market complex has been demolished. The subject building was constructed c.1924 when the produce industry in the vicinity was expanding, City Market in particular, though it is not known if City Market constructed the subject building. By the time City Market is known to have owned the building, the market was at its height. By 1940, it was one of the largest wholesale producing facilities in the United States. However, the building does not effectively convey the wholesale produce market property type or the history of City Market on its own. Therefore, it is not significant under Criterion A for its association with this context.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

Young Produce Company occupied the building from at least 1929 until at least 1932. The company was owned by K. Suey Young, a Chinese American fruit market owner. Young was born in California c.1884, according to the 1940 census.⁶² No information was found on Young to indicate that he could be considered a person significant in our past.

K&S Jobbers, which occupied the building by 1936 and remained until 1965 or 1966, was owned by Young Kim. Kim was a Korean market owner born c.1899 in Korea, according to the 1940 census.⁶³ No information was found on Kim to indicate that he could be considered a person significant in our past. The building is therefore not significant for its association with either Young or Kim.

The building was likely constructed by City Market, though the earliest ownership information found dates to 1937. The president of City Market at time of the building's construction in approximately 1924 and first documented ownership in 1937 was Edward J. Fleming. While Fleming was associated with the establishment of City Market as a whole, there is no evidence that he was directly associated with this building in particular. The building is not significant for its association with him.

The building is not significant under Criterion B.

⁶² 1940 United States Federal Census, www.ancestry.com (accessed June 19, 2013).

⁶³ 1940 United States Federal Census, www.ancestry.com (accessed June 19, 2013).

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building is a typical example of an industrial building constructed in the 1920s. It does not possess any distinguishing characteristics of a type, period, or method of construction. It is not significant under this aspect of Criterion C. The original building permit was not found, so it was not possible to determine if the building had a well-known architect or builder. The building is a typical industrial building, however, so it is unlikely that it was designed by a master. It does not appear to be significant under this aspect of Criterion C.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply.

The building is therefore not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the property has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. The building's setting has been altered by the construction of a large commercial building directly across the street in 1995. The building replaced low-rise buildings devoted to automobile storage and repair. The setting has therefore been substantially altered and no longer remains.

The building has been minimally altered (the only exterior alterations consist of the construction of an addition to the building, presumably to the rear, the seismic retrofit of the building, and the addition or replacement of a roll-up door in the primary elevation). The building's design has been minimally impacted by these changes, and its integrity of design remains. The replacement of the roll-up door has affected the building's integrity of materials since the building possessed simple materials in its original form. The replacement of what was presumably a wood tilt-up or roll-up door with a metal one has impacted the building's integrity of materials and workmanship, but has not resulted in a complete loss of these two aspects of integrity. The building still feels like an industrial building from the 1920s, so it retains its integrity of feeling. The building is not significant under Criteria A or B, so there is no relevant association to evaluate.

In conclusion, although the building retains the majority of its applicable aspects of integrity, it is not significant under any of the four established National Register criteria. It is therefore not eligible for listing on the National Register.

Building 15: 1125 South San Pedro Street (APN 5145-025-009)

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The context considered in this evaluation was the history of the wholesale produce industry in Los Angeles.

The building was likely constructed by City Market in approximately 1935, based upon a demolition permit filed in 1934 to clear the site. The permit listed City Market as the owner. City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, south of 9th Street and just north of 11th Street, adjacent to the site of the subject building. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. As it expanded, it acquired the land the subject building is located on from developer O.W. Childs. Much of the original City Market complex has been demolished. The subject building was constructed c.1935 when City Market was expanding to the southwest from its original complex of buildings. In the 1930s and 1940s, City Market was at its height. By 1940, it was one of the largest wholesale producing facilities in the United States. However, the building does not effectively convey the wholesale produce market property type or the history of City Market on its own. Therefore, it is not significant under Criterion A for an association with this context.

The building was occupied by Potato Marketing Company by 1942. Potato Marketing Company was an Ontario, California-based wholesale company. By 1956, it was occupied by Potato Sales Company, owned by Saul Lasher, and George Kamrass, a fruit and vegetable broker. No information was found to indicate that any of these companies were significant within the wholesale produce industry in Los Angeles. The building is not significant under Criterion A for its association with these companies and the wholesale produce industry in Los Angeles.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

The president of Potato Marketing Company Ira A. Daniel; Herbert P. Bobo was vice-president. Daniel was originally from Arkansas and was born c.1906. In 1940, he lived with his wife at 6329 Harvard Boulevard. Herbert Bobo was born c.1913 in California. In 1940, he lived with his wife at 862 East Kensington Road.⁶⁴ By the 1960s, he owned a potato farm in the San Joaquin Valley. No information was found on Daniel or Bobo to indicate that either man could be considered a person significant in our past.

⁶⁴ 1940 United States Federal Census, www.ancestry.com (accessed June 25, 2013).

Saul Lasher was born c.1915 in Canada. By 1940, he was living in Los Angeles with his sister and her family. He passed away in 1987 in Los Angeles. Research did not reveal any information that would indicate he could be considered a person significant in our past.

George J. Kamrass, a fruit and vegetable broker, utilized the building in 1956. The 1955 city directory indicates that he lived in Beverly Hills at 140 North Hamel Drive with his mother. By 1960, he is listed as being involved with the novelties business. Research did not reveal any information to indicate that he could be considered a person significant in our past.

The building is not significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building is a typical example of an industrial building constructed in the 1930s. It is constructed of poured-in-place concrete, a common construction method at the time. It does not possess any distinguishing characteristics of a type, period, or method of construction. It is not significant under this aspect of Criterion C. The original building permit was not found, so it was not possible to determine if the building had a well-known architect or builder. The building is a typical industrial building, however, so it is unlikely that it was designed by a master. It does not appear to be significant under this aspect of Criterion C.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply.

The building is not significant under Criterion C.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the property has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of setting. The building's setting has been altered by the construction of a large commercial building directly across the street in 1995. The building replaced low-rise buildings devoted to automobile storage and repair. The setting has therefore been substantially altered and no longer remains.

The degree of the building's alterations is unknown, as the bays on the primary elevation are covered with metal roll-up doors. The bays may have been resized, as the subject may have once been identical in appearance to the adjacent building at 1127 South San Pedro Street. Potential alterations therefore include the replacement of the storefronts and resizing of the bays. If this is the case, the building has been substantially altered and no longer retains its integrity of design, materials, or workmanship. Since the building was originally a relatively simple industrial building with minimal design elements, any alterations have a greater impact on its integrity of design, materials, and workmanship than those on a building of more complex design. The building no longer retains its integrity of feeling, as it feels like a more modern building due to its alterations. The building is not significant under Criteria A or B, so there is no relevant association to evaluate.

In conclusion, the building no longer retains the majority of its applicable aspects of integrity, nor is it significant under any of the four established National Register criteria. It is not eligible for listing on the National Register.

Building 16: 1127 South San Pedro Street (APN 5145-025-010)

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The context considered in this evaluation is the history of the wholesale produce industry in Los Angeles.

The building was likely constructed by City Market in approximately 1935, based upon a demolition permit filed in 1934 to clear the site. The permit listed City Market as the owner. City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, south of 9th Street and just north of 11th Street, adjacent to the site of the subject building. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. As it expanded, it acquired the land the subject building is located on from developer O.W. Childs. Much of the original City Market complex has been demolished. The subject building was constructed c.1935 when City Market was expanding to the southwest from its original complex of buildings. In the 1930s and 1940s, City Market was at its height. By 1940, it was one of the largest wholesale producing facilities in the United States. However, the building does not effectively convey the wholesale produce market property type or the history of City Market on its own. Therefore, it is not significant under Criterion A for its association with this context.

The building was occupied by Willard Snyder Produce Company by 1956. From at least 1956 until at least 1964, the offices of the Morita Produce Company utilized the building (it was listed at 1129 ½ South San Pedro Street).⁶⁵ Quaker City Produce occupied the building in 1973.

⁶⁵ *City Directories indicate Morita Produce remained in the building until at least 1962, and a 1964 Los Angeles Times article mentions the business and its location at 1129 ½ South San Pedro Street.*

No information was found on Willard Snyder Produce Company. Morita Produce occupied a stall at 950 San Julian Street, in the original City Market buildings, and had their office at 1129 ½ South San Pedro Street. The company was founded by Hiroshi and Toshiko Morita in 1938, according to the company's website.⁶⁶ The only information found about Quaker City Produce related to a Philadelphia-based company. The company at 1129 South San Pedro Street may have been a branch of that business, but this is not known for certain.

No information was found about any of these companies to indicate that they could be considered significant to the history of the wholesale produce industry in Los Angeles. The building is not significant for its association with this context.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

Willard Snyder Produce Company appears to have been owned by Willard Snyder. No information was found on Snyder to indicate that he could be considered a person significant in our past. No information was found on Quaker City Produce or who may have owned or operated it.

Morita Produce Company was established by Hiroshi and Toshiko Morita in 1938. According to the 1940 census, Hiroshi Morita, a Japanese American, was born c.1908. He and his wife Toshiko lived at 2068 30th Street.⁶⁷ No information on the Moritas was found to indicate that they could be considered significant persons in our past.

The building is not significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building is a typical example of an industrial building constructed in the 1930s. It does not possess any distinguishing characteristics of a type, period, or method of construction. It is not significant under this aspect of Criterion C. The original building permit was not found, so it was not possible to determine if the building had a well-known architect or builder. The building is a typical industrial building, however, so it is unlikely that it was designed by a master. It does not appear to be significant under this aspect of Criterion C.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since

⁶⁶ Morita Produce, <http://www.moritaproduce.com/> (accessed June 25, 2013).

⁶⁷ 1940 United States Federal Census, www.ancestry.com (accessed June 25, 2013).

the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the property has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. The building's setting has been altered by the construction of a large commercial building directly across the street in 1995. The building replaced low-rise buildings devoted to automobile storage and repair. The setting has therefore been substantially altered and no longer remains.

The building has been altered from its original appearance, including the replacement of the storefronts, which likely contained roll-up doors originally. This has resulted in a loss of integrity of design, materials, and workmanship. Since the building was originally a relatively simple industrial building with minimal design elements, any alterations have a greater impact on its integrity of design, materials, and workmanship than those on a building of more complex design. The building no longer retains its integrity of feeling, as it feels like a more modern commercial building, rather than an industrial building from the 1930s. The building is not significant under Criteria A or B, so there is no relevant association to evaluate.

In conclusion, the building no longer retains the majority of its applicable aspects of integrity and is not significant under any of the four established National Register criteria. It is not eligible for listing in the National Register.

Building 17: 1137 South San Pedro Street (APN 5145-025-011)

Criterion A - The property was evaluated for its potential significance as part of a historic trend that made a significant contribution to the broad patterns of our history. The context considered in this evaluation was the development of the wholesale produce industry in Los Angeles.

City Market was significant in the context of the wholesale produce industry in Los Angeles as an early example of a consolidated produce market that brought together countless growers and wholesalers into a single entity. It represented the important role of agriculture in the regional economy during the pre-war period. The market was originally comprised of five buildings located along San Julian and South San Pedro Streets, south of 9th Street and just north of 11th Street. As City Market grew in the 1920s, it expanded its facilities south from its original five buildings. Additional buildings were constructed south of 11th Street, which stood among buildings used for other uses and properties owned by other companies. Much of the original City Market complex has been demolished.

The building was constructed in 1948, likely by City Market. The original building permit was not found, but a roofing permit from 1946, which appears to have been for another earlier building, indicates City Market as the owner. It is therefore likely that City Market also constructed this building two years later

on the same parcel. The construction of the building essentially completed the expansion cycle of the company. It does not effectively convey the wholesale produce market property type or the history of City Market on its own. Therefore, it is not significant under Criterion A for an association with this context.

Criterion B – The property was evaluated for its potential association with the lives of persons significant in our past.

City Market appears to have constructed the building in 1948. The president of City Market at the time was Walter P. Fleming. However, while Fleming was associated with City Market as a whole, there is no evidence that he was associated with this building in particular.

The building was occupied by produce companies beginning in at least 1956 (this was the earliest listing found in Los Angeles city directories for the building). Numerous individuals associated with these companies would have worked in the building. There is not one particular person associated with the building. Therefore, it is not significant under Criterion B.

Criterion C – The property was evaluated for its potential to embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction.

The building is a typical example of an industrial building constructed in the 1940s. It does not possess any distinguishing characteristics of a type, period, or method of construction. It is not significant under this aspect of Criterion C. The original building permit was not found, so it was not possible to determine if the building had a well-known architect or builder. The building is a typical industrial building, however, so it is unlikely that it was designed by a master. It does not appear to be significant under this aspect of Criterion C.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of an industrial building from its time period and it does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply.

Criterion D - Criterion D was not considered in this report, as it generally applies to archeological resources. At any rate, there is no reason to believe that the property has yielded, or will yield information important to the prehistory or history of the local area, California, or nation.

Integrity – The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. The building has not been moved, so it retains its integrity of location. Although the overall setting around the building remains as it was when the building was constructed (made up of low-rise commercial and industrial buildings), the immediate setting has been altered. Sanborn maps from 1950 indicate that shortly after the building was constructed, the

properties on the other side of San Pedro Street consisted largely of low-rise automobile garages, storage facilities, and repair shops. These buildings have been replaced with commercial buildings constructed within the last 30 to 40 years; they have a new appearance, are taller in height and larger in scale, and have fundamentally altered the streetscape along this portion of San Pedro Street from what it was in 1950. Therefore, the building no longer retains its integrity of setting. The building has not been significantly altered, save for the replacement of a minority of its bi-fold doors. Therefore, it retains its integrity of design, materials, and workmanship. It retains its integrity of feeling, as the building still feels like an industrial building from the 1940s. The building is not significant under Criteria A or B, so there is no relevant association to evaluate.

In conclusion, the building does not appear eligible for listing on the National Register under any of the four established criteria, despite the retention of the majority of its applicable aspects of integrity, due to a lack of significance.

(b) California Register of Historical Resource

The California Register was modeled on the National Register. The criteria for eligibility of listing in the California Register are virtually the same as the National Register. Therefore, the properties evaluated above are ineligible for listing in the California Register for the same reasons noted above. The exception is building at 1122 San Julian Street. Identified as Building 5 in the Historic Resources Report (Appendix E.1 to this Draft EIR), it is an excellent intact example of a wholesale produce building from the 1920s.

(c) Los Angeles Historic-Cultural Monument

The criteria for eligibility for properties to be designated as a Los Angeles Historic-Cultural Monument are similar to the National and California Registers. Therefore, the properties evaluated above are ineligible for designation as Monuments for the same reasons noted above. Once again, the exception is Building 5, which is an excellent intact example of a wholesale produce building from the 1920s.

(4) South Central Coastal Information Center Records Search

On May 20, 2013, a records search was conducted for the above referenced project by the SCCIC. The search is included in Appendix E.2 to this Draft EIR and includes a review of all recorded archaeological sites within a ½-mile radius of the project site as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), the California State Historic Resources Inventory (HRI), and the City of Los Angeles Historic-Cultural Monuments (LAHCM) listings were reviewed for the Project Site.

(a) Archaeological Resources

Based on the records search conducted by the SCCICS at California State University Fullerton, dated June 3, 2013 (See Appendix E.2 to this Draft EIR), one archaeological site (19-002545) has been identified within a ½-mile radius of the Project Site. No sites are located within the Project Site. This

does not preclude the potential for archaeological sites to be identified during project activities. No isolates have been identified within a ½-mile radius of the Project Site.⁶⁸ No isolates are located within the Project Site.

(b) Historic Built-Environment Resources

Forty-three above-ground historic resources have been identified on SCCIC's maps within a ½-mile radius of the project site. No above-ground historic resources are located within the Project Site.

(c) Additional Cultural Resource Listings

The California Historic Resources Inventory (HRI) lists forty-three properties that have been evaluated for historical significance within a ½-mile radius of the Project Site (see Appendix E.2). These are additional resources that are listed in the Historic Properties Data file and are located either within the project site or within the search radius.

(d) California Point of Historical Interest (SPHI)

The SPHI of the Office of Historic Preservation, Department of Parks and Recreation, lists no properties within a ½-mile radius of the Project Site.

(e) The California Historical Landmarks (SHL)

The SHL of the Office of Historic Preservation, Department of Parks and Recreation, lists no properties within a ½-mile radius of the Project Site.

(f) The California Register of Historical Resources

The California Register lists nine properties within a ½-mile radius of the Project Site. These are properties determined to have a National Register of Historic Places Status of 1 or 2, a California Historical Landmark numbering 770 and higher, or a Point of Historical Interest listed after 1/1/1998.

The National Register of Historic Places (NRHP) lists three properties within a ½-mile radius of the Project Site; Hollywood 19-173240 Garment Capitol Building, 217 E. 8th St., Los Angeles, 1000053, LISTED, 3/08/10.

(g) The City of Los Angeles Historic-Cultural Monuments (LAHCM)

The LAHCM lists no properties within the Project Site.

⁶⁸ *Isolates are one or two artifacts occurring by themselves that are not associated with an archaeological site. They are generally thought to represent items lost or discarded by people as they moved through an area.*

(h) Previous Cultural Resources Investigations

Twenty-eight studies have been conducted within a ½-mile radius of the Project Site. Of these, none are located within the Project Site. There are eighteen additional investigations located on the Hollywood, CA and Los Angeles, CA 7.5' USGS Quadrangles that are potentially within a ½-mile radius of the Project Site. The reports are not mapped due to insufficient locational information.

3. ENVIRONMENTAL IMPACTS

A. Methodology

The historic resources assessment of the City Market of Los Angeles involved a multi-step methodology. In conducting the analysis of potential historic resources, GPA performed the following tasks:

1. Established the study area for the report as a larger area than the actual Project Site (See Figure IV.C-1).
2. Reviewed the California Historical Resources Inventory System (CHRIS), which includes properties listed and determined eligible for listing in the National Register of Historic Places, listed and determined eligible for listing in the California Register of Historical Resources, California Registered Historical Landmarks, Points of Historical Interest, as well as properties that have been evaluated in historic resource surveys and other planning activities. None of the buildings in the study area are in the database. However, several of the buildings within the study area have been previously evaluated as part of a historic resource survey conducted by the Los Angeles Community Redevelopment Agency in 1992. Additional research confirmed that none of the buildings are listed as Los Angeles Historic-Cultural Monuments.
3. Conducted a field inspection of the study area to identify potential historic resources. Potential historic resources were considered buildings or structures over 45 years of age or older, substantially unaltered, or included in previous historic resource surveys of the area.
4. Digital photographs were taken of every building, structure, and parking lot within the study area during the field inspection. (Please refer to Appendix E.1.)
5. Obtained and reviewed the building permit record from the City of Los Angeles Building and Safety Department for the buildings targeted for evaluation. Dates of construction and subsequent alterations were determined primarily by the building permit record. For those buildings without original building permits, research was conducted at the Los Angeles County Assessor's Office to establish the date of construction and chain of ownership.
6. Researched the history of the site to determine its evolution over time and to determine the context in which the buildings thereon were to be evaluated as potential historic resources. Research also included property specific research related to those buildings on the site over 45 years of age. Sources consulted included Sanborn Fire Insurance Maps, Los Angeles City Directories, historic photographs,

articles, and books. Researchers contacted the Japanese American National Museum in Los Angeles for information on one particular wholesale produce company, Venice Celery Distributors, that appeared to have been significant within the context of the pre-World War II wholesale produce industry, but no information was found at the museum's library.

7. Reviewed and analyzed ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation designations, and assessment processes and programs.

B. Thresholds of Significance

(1) Appendix G of the State CEQA Guidelines

According to Checklist Questions V(a) through V(d) in Appendix G of the State CEQA Guidelines, a project may have a significant environmental impact if it were to:

- Cause a substantial adverse change in significance of a historical resource as defined in §15064.5;
- Cause a substantial adverse change in significance of an archaeological resource pursuant to §15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;
- or
- Disturb any human remains, including those interred outside of formal cemeteries;

(2) L.A. CEQA Thresholds Guide

The *L.A. CEQA Thresholds Guide* provides that a project would normally have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

In addition to this guidance provided by the City, the State Legislature, has amended CEQA to clarify which properties are significant, as well as which project impacts are considered to be significantly adverse.

A project with an effect that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment.⁶⁹ A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.⁷⁰

The Guidelines further provide that “[t]he significance of an historic resource is materially impaired when a project... [d]emolishes 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... local register of historic resources... or its identification in a historic resources survey.”⁷¹

C. Project Impacts

(1) Historic Resources

The Project Site includes the development of up to approximately 1,690,000 square feet of floor area consisting of approximately 945 multiple residential dwelling units, 210 hotel rooms, approximately 294,641 square feet of commercial (including medical and general office) and manufacturing uses, approximately 224,862 square feet of retail floor area (including restaurants, bars, event space, wholesale uses and a cinema with approximately 744 seats), and approximately 312,112 square feet of corporate/educational campus floor area. The Project would include approximately 3,671 parking spaces in structured and below grade parking areas. It is anticipated that some of the existing buildings and structures may be retained and repurposed as part of the proposed development. However, for purposes of this analysis, it is conservatively assumed all of the buildings and structures on the Project Site may be demolished over the course of the project’s buildout - with the notable exception of the one building identified as a historic resource at 1122 San Julian Street.

Based upon the research and field inspection conducted, GPA concluded that one of the buildings within the study area is eligible as a landmark at the national, state, or local levels due to lack of significance or lack of integrity. GPA evaluated 17 buildings and one structure within the study area as potential historic resources because they are over 45 years of age, retained sufficient integrity to warrant evaluation, or were previously evaluated in 1992. The remainder of the buildings are less than 45 years of age or are so heavily altered that they do not retain sufficient integrity to qualify as potential historic resources. As such, these were eliminated as candidates for further study. Based upon the research and field inspection conducted, GPA concluded that one building within the study area is eligible as a historic resource, 1122 San Julian Street. The other buildings are ineligible as landmarks at the national, state, or local levels due to lack of significance or lack of integrity.

⁶⁹ *CEQA Guidelines, Section 15064.5(b).*

⁷⁰ *CEQA Guidelines, Section 15064.5(b)(1).*

⁷¹ *CEQA Guidelines, Section 15064.5(b)(2).*

Several of the buildings were identified as eligible for listing in the National Register of Historic Places in a historic resource survey of the area conducted by the CRA/LA in 1992. However, the buildings were identified as contributing to two potential historic districts, not as individual resources. The two potential historic districts, City Market and City Market Area Chinese Grouping, have related histories and overlapping boundaries. The buildings associated with the potential City Market district were entirely located in the study area and include the original City Market buildings that have since been demolished, the remnants of two buildings, and the buildings described above. The City Market Area Chinese Grouping included the same buildings as well as additional buildings west of San Julian Street and east of South San Pedro Street. The City Market Area Chinese Grouping was not re-evaluated as a part of this EIR as it extends beyond the study area. Regardless of the significance of the potential historic district, the City Market does not retain integrity as a whole; the original City Market of Los Angeles is gone, there are only nine would-be contributing buildings that do not form a cohesive historic environment when combined with the surrounding buildings, and the nine would-be contributing buildings cannot convey the significance of the early history of the City Market of Los Angeles.

The Project does not involve the demolition of any historic resources. The only historic resource on the Project Site is the building located at 1122 San Julian Street. This structure is identified as Building 5 in the Historic Resources Report and will be preserved in place and incorporated into the Proposed Project. The only anticipated alterations to the building are interior tenant improvements. Therefore, the Project would have no direct impacts on historic resources.

The bulk of the proposed development would be located on the block north of the historic resource. The property to immediately south of the historic resource is not part of the Project. The driveway north of the subject building that originally provided access to the loading dock would be preserved as open space. A new building would be constructed east of the historic resource facing South San Pedro Street. However, the construction of this building would not involve any alterations to the historic resource. Thus, the historic resource would remain a freestanding building and no indirect impacts from the Project would result. As the Project will have no impact on historic resources, no mitigation is required or recommended.

(2) Archaeological Resources

Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as those resources which meet the criteria for historical resources, as described above, or resources which constitute unique archaeological resources. The Project Site is located in an urbanized area which has been previously disturbed by past development activities. As evident in the historic resources assessment presented above, the City Market of Los Angeles was initially constructed in 1909. The Project Site is not located in an area designated by the City as an archaeological site or survey area.⁷² Additionally, no archeological sites or resources are located within the Project Site.⁷³ Thus, any surficial archaeological

⁷² *City of Los Angeles Planning Department, Environmental and Public Facilities Maps, Prehistoric & Historic Archaeological Sites and Survey Areas map, September 1996.*

⁷³ *Written correspondence from the South Central Coast Information Center at California State University Fullerton on June 3, 2013 (See Appendix E.2 to this Draft EIR).*

resources that may have existed at one time have likely been previously unearthed or disturbed. While no further evaluation of archaeological resources is recommended, periodic monitoring during construction is recommended as a precautionary measure to mitigate potential impacts upon the unlikely discovery of archaeological resources, including the potential Native American cultural resources or burial sites, during construction of the proposed Project, should any such materials be encountered. Without mitigation, the accidental discovery and/or damage to any archaeological resources that may exist below grade during the construction process would result in a potentially significant impact.

(3) Paleontological Resources

As discussed in the Initial Study (see Appendix A to this Draft EIR), there are no known paleontological resources on the Project Site. No vertebrate fossil sites have been identified in the vicinity of the Project Site.⁷⁴ Therefore, previously disturbed surficial soil layers on the Project Site are not likely to contain substantive vertebrate fossils. The Project Site has been previously disturbed and paved for development. The proposed excavation of the parking structures and associated excavation and grading for building foundations and utilities would extend to approximately 35-40 feet below grade level. While it is possible that paleontological resources could be discovered during construction activities, it is unlikely due to the previous disturbance and development that has occurred on the Project Site. Nevertheless, without mitigation, the accidental discovery and/or damage to any paleontological resources during the construction process would result in a potentially significant impact.

D. Land Use Equivalency Program

The Proposed Project includes a Land Use Equivalency Program that would allow flexibility in the buildout of the Project with respect to land uses and floor areas so that the Project can respond to market fluctuations. Within this framework, permitted land uses can be exchanged for other permitted land uses so long as the limitations of the Equivalency Program and “[Q]” Conditions are satisfied.

With respect to potential impacts upon cultural resources (including historic, archeological, and paleontological resources), the exchange of one land use for another would not affect the proposed grading and earthwork assumptions, or physical development within the overall scope of the project with respect to maximum floor area, the project’s design guidelines, or Project Design Features. The exchange of one permitted land use for another permitted land use would be accomplished within the same FAR limitation at the Proposed Project. Land use exchanges permitted under the Land Use Equivalency Program would also be subject to the same Regulatory Compliance Measures as the Project and would be subject to the Site Plan Review Process pursuant to LAMC Section 16.05. Thus, the impacts to cultural resources would be the same under the Land Use Equivalency Program as described for the Proposed Project.

⁷⁴ *City of Los Angeles Planning Department, Environmental and Public Facilities Maps, Vertebrate Paleontological Resources map, September 1996.*

4. CUMULATIVE IMPACTS

In accordance with Section 15130(b)(1)(A)(B) of the CEQA Guidelines, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes conditions contributing to the cumulative effect. The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. For purposes of assessing the Project's cumulative impact with respect to impacts upon cultural resources (including archaeological, paleontological and historic resources), the analysis below is appropriately based on a combination of the plan-based approach and the list-based approach to determine the Project's contributing effect on potential cumulative impacts on cultural resources.

The Proposed Project, in combination with the construction and operation of the 139 related projects (See Section III, Environmental Setting) would result in the continued redevelopment and revitalization of the surrounding area. However, impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. Additionally, the historic resource assessment for the Proposed Project concluded that the Project will not result in significant adverse impacts on identified historic resources located within and adjacent to the Project Site following appropriate mitigation. Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

5. PROJECT DESIGN FEATURES

PDF C-1 The building located at 1122 San Julian Street (identified as Building 5 in the Historic Resources Report) will be preserved in place and incorporated into the Proposed Project.

6. REGULATORY COMPLIANCE MEASURES

CM C-1 If any archaeological materials are encountered during the course of Project development, all further development activity shall halt and:

- a) The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (SCCIC) (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact;
- b) The archaeologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource;
- c) The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report; and
- d) Project development activities may resume once copies of the archaeological survey, study or report are submitted to the SCCIC Department of Anthropology. Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if

any, archaeological reports have been submitted, or a statement indicating that no material was discovered.

- e) A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to issuance of a grading permit.

CM C-2 If human remains are discovered at the Project Site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City Public Works Department and County Coroner shall be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.

CM C-3: If any paleontological materials are encountered during the course of Project development, all further development activities shall halt and:

- a) The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact;
- b) The paleontologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource;
- c) The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report; and
- d) Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum. Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.
- e) A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to issuance of a grading permit.

7. MITIGATION MEASURES

No mitigation measures are required.

8. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With the incorporation of mitigation measures, impacts upon cultural resources, including archaeological and paleontological resources would be mitigated to less than significant levels. Impacts to historic structures would be less than significant prior to mitigation. Thus, no mitigation measures are warranted for the less than significant impact upon historic resources.