Appendix C-1

Cultural Resources Assessment Report: Barley Mills Building,
3596 Commerce Street & 3051 Mission Inn Avenue; Riverside CA
Site of Riverside Soda Works, 2993 Mission Inn Avenue; Riverside CA

George Taylor Louden AIA, Inc

March 2025

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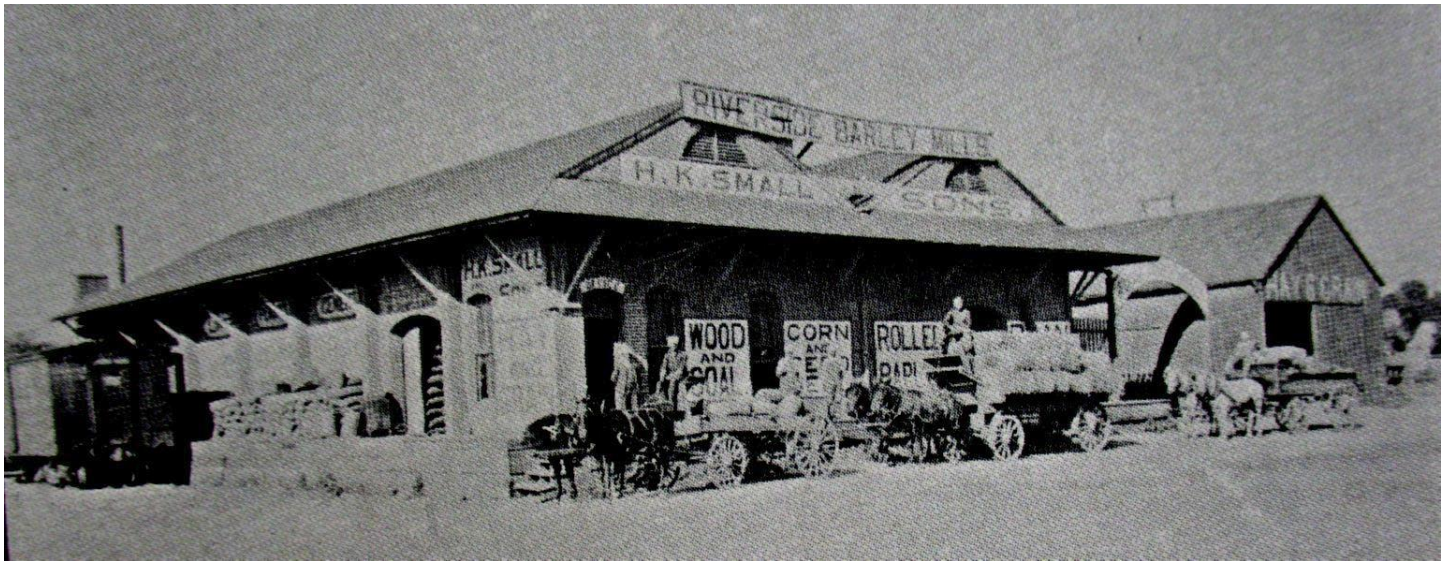
Modern Historical Architecture Preservation

Cultural Resources Assessment Report: Barley Mills Building
3596 Commerce Street & 3051 Mission Inn Avenue; Riverside CA
Site of Riverside Soda Works, 2993 Mission Inn Avenue; Riverside CA

Iron Lofts Proposed Mixed- Use Residential Development for Realm/ Iron Lofts LLC
Design Consult for Proposed Adaptive Reuse and New Construction Development:



Barley Mills Building context, H. K. Small Sons, southwest façade photograph c. 1906

Figure 1: original projected canopy; referenced for reconstruction. Note freight car on siding at west façade.

1 Executive Summary / Introduction:

Iron Lofts LLC proposes to construct a low rise, multi-story, mixed use 300 unit multi-family residential development (the Project,) named the Iron Lofts. Located at 3051 Mission Inn Avenue and incorporated within the Seventh Street East (Residential) Historic District. This Project proposes to rehabilitate the former Barley Mills Building for an adaptive reuse of this original 1891 structure. The project design intent is to rehabilitate the building's original south, north, east and west façades with a reconstruction of the original projecting canopies over a perimeter loading dock at the south and west façades. The removal of later 1930 (non-contributing) additions expanding from the original north and east façades will protect the original Barley Mills Building during construction of the Iron Lofts

This report (Report) focuses on two structures: the 1891 Barley Mills Building and the site of the former Soda Works Building severely damaged by fires, collapse of the rear half and a severe wind event.

First, this Report understands the Barley Mills Building constitutes a "historic resource" under local criteria as a Riverside "City Structure of Merit" number 86. Under the California Environmental Quality Act ("CEQA") a qualified rehabilitation of a historic resource is compliant with CEQA. This Report concludes that the Barley Mills building qualifies as a historic resource for the following reasons:

1. The Barley Mills Building is designated as a local Structure of Merit by the City as a historically and culturally significant resource. Notably, the building qualifies as an example for the following attributes: It is one of the few remaining examples of an Orange Packing House related structure, one of the oldest such structures in the city, and representative of Riverside's early agrarian agricultural economy. The Barley Mills Building housed various operations at times in the structure: milling, seeds and grains, feeds, equine, fertilizer, stables and in a later period, the citrus packing industry. The historic presence of the railroad spur track along the west and east façades is emblematic of the original commercial use of the property.

2. The former "Riverside Soda Works" structure site was located at the southeast corner of the property at 2993 Mission Inn Avenue. This structure was constructed in 1911 by local contractor Castleman and Knoll, with no identification of an architect or an engineer. There was local historic designation of this Commercial / Industrial structure by the city of Riverside as a Structure of Merit, and a contributor located in a portion of the Seventh Street East (Residential) Historic District. The Soda Works structure was previously compromised by a building fire that resulted in the partial collapse of the northern portion of the structure. Documentation of the structure was made in 2022 and 2023 as part of a project evaluation of the structure for a potential adaptive reuse. There was insufficient remaining integrity to develop a feasible reuse, even before a wind storm reaching 70 miles per hour on 20 November 2023 caused a collapse of the southern false front façade. The extent of the

damage and loss would make reconstruction of the Soda Works building infeasible economically and of limited historic value as a Structure of Merit. The remaining building elements were salvaged for potential adaptive reuse and the remainder demolished and removed by the City Engineering department after their structural evaluation. Currently proposed is an outdoor garden park for Iron Lofts residents and their dogs that will anchor the southeast corner with fencing outlining the original structure footprint including interpretive historical markers.

Secondly, this Report will analyze if the proposed Iron Loft Residential project would result in a substantial adverse change in significance of the Seventh Street East Residential Historic District, nor would the identification of the Barley Mills Building rehabilitation by the city as a local Structure of Merit be compromised. This Report will conclude that the proposed Project would not result in such a change. The Compatibility Study providing this analysis is found in the following section #2.

CEQA defines a "substantial adverse change in the significance of a historic resource" to mean "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance" of the historic resource would be "materially impaired." (State CEQA Guidelines, § 15064.5(b)(1).) Portions of the proposed Iron Loft project are set within the Seventh Street East Residential Historic District. With a higher change in grade, the adjacent four-story transitional Multi-Family Residential, hereafter, MFR) residential structure transitions to two-story MFR structures to the east. A required "Green" canopy covering the adjacent parking area, including the existing and additional landscape buffering at the eastern property line indicates there would be limited direct physical impacts to the adjacent residential historic district. Moreover, the Project would not materially impair the significance of the Seventh Street East Residential Historic District, nor would the Barley Mills Building be compromised as a local Structure of Merit. (State CEQA Guidelines, § 15064.5(b)(1)-(2).) The Barley Mills Building is located wholly within the "Citrus Thematic Industrial Potential Historic District."

For all of the above reasons, and the reasons set forth in this Assessment Report, the proposed Project will not have a significant negative impact on the Barley Mills Building as a City of Riverside Structure of Merit historic resource, nor the Seventh Street East Residential Historic District.

Figure 2: Mission Inn Avenue site section/elevation # 1, South façade and site context # 2A
Source: ktgy Architecture + Planning, Sheet A2-0.

Figure 3: Partial west Commerce Street façade. Proposed palm trees frame existing Barley Mills Building.

Figure 4: Detail, West façade Commerce Street elevation and site context of the existing Mission Lofts Apartments at the right along Mission Inn Avenue.

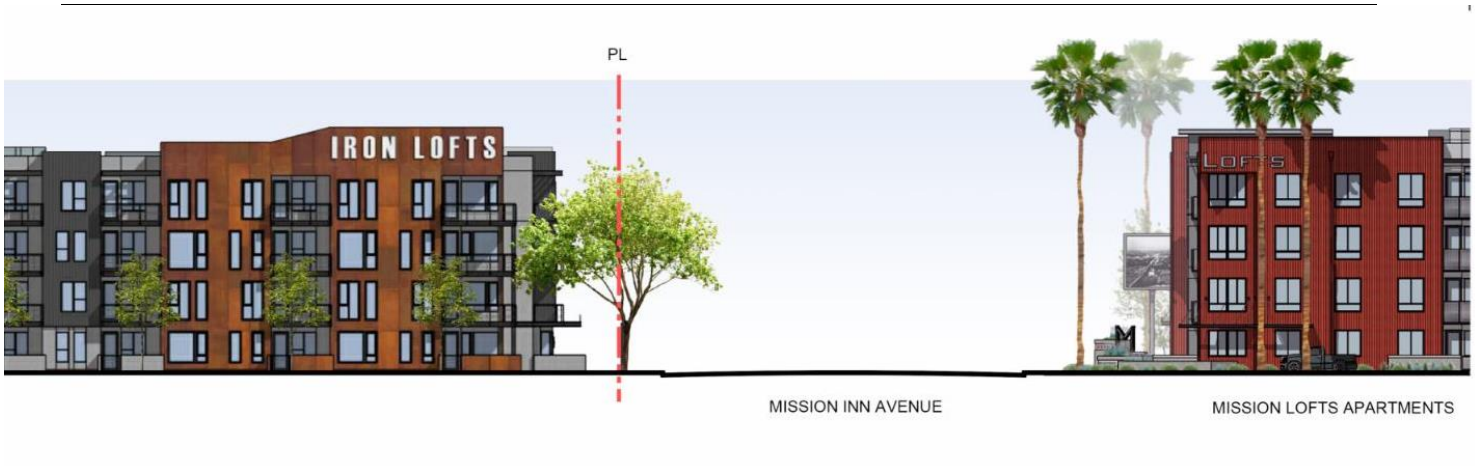


Figure 5: Detail, West façade Commerce Street elevation and site context of the existing Mission Lofts Apartments

Source: ktgy Architecture + Planning, Sheet A2-0.

2 Compatibility Analysis Assessment: Barley Mills Building, proposed Iron Lofts project and Site Context

This study analysis comprises two aspects of the proposed Iron Lofts LLC Project compatibility:

1: Compatibility of the Iron Lofts Project with the Seventh Street East Residential Historic District, the Seventh Street Historic District and the adjacent site context;

2: Compatibility of the Iron Lofts project with the Barley Mills Building individually as a Structure of Merit.

1: The proposed Iron Lofts project references the historical adjacency of the single family residences (thereafter, the SFR) along Sixth Street to the southeast, and Fifth and Fourth streets to the northeast. These SFR were generally constructed between 1880 and 1945. At the proposed project site there are no extant SFR structures. Many of the remaining SFR have over the years been converted into multi- family residences. A great number of the commercial structures along Commercial Street (originally named Pachappa) to the southwest have been demolished. The Southern Pacific and the Atcheson Topeka & Santa Fe Railroad (Now the BNSF) main line located to the west are operational, excepting the spur and siding tracks which have been archived in place on Commercial Street. Directly across Mission Inn Avenue towards the southwest is the 212- unit Mission Lofts multi-family project completed by Realm in 2019. This project is located in the block adjacent to the south of the Barley Mills Building, which is within the eligible "Citrus Thematic Industrial Potential Historic District." At the southeastern corner of the Iron Lofts project site is the site of the former Soda Works structure, within the Seventh Street East Residential Historic District.

This existing context, a combination of Commercial and Multi- Family and Single Family Residences, within or adjacent to the Seventh Street East (Residential) Historic District demonstrates a compatibility of these different building types both historically, as well as compatibility with current efforts to encourage residential construction nearby to the downtown Riverside Mission Inn Historic District.

The proposed Iron Lofts Project will include the use of referential and compatible materials. Colors proposed for the façades, compatibility of colors, textures, design and materials, and compatibility of scale and massing relative to surrounding structures within the Commercial Zone and the Seventh Street East Residential Historic District. The color selections proposed by the architect are derived from referencing materials and colors of differing local structures.

Using materials that are similar to those present in the commercial district includes burnished concrete masonry units, precast concrete, stucco plaster walls surfaces, a mix of colors including

shades of light and warm greys, corrugated steel and perforated steel weathered panels, and operable windows with minimal frames. Compatibility of the material, massing, color and finish selections is consistent with the few remaining and several since-demolished structures. As an example, the non-extant Sunkist packing house facility had been directly across Sixth Street to the southwest of the Barley Mills Building. This consistency is reinforced by earlier aerial context views shown in the Historic American Engineering Record (hereafter, HAER) photographic surveys. Refer to Figure 12, page 22.

2: The proposed Iron Lofts Project will retain the earliest appearance iteration of the 1891 Barley Mills Building configuration by the proposed controlled removals of the later 1930 concrete expansions of the original Barley structure towards the east and north.
A required structural upgrade for this proposed adaptively-reused community space will address the Unreinforced Brick Masonry (hereafter, URM) perimeter walls and foundations, replacing the original wood trusses and wood beams supporting the roofing system that will match the visual appearance and material profile of the original structure. Heavy timber wood posts supporting the longitudinal beam will be retained or repaired and replaced with compatible 8" by 8" members where the wood timber material has lost structural integrity.

Much of the original roof sheathing is missing, or beyond repair, or at best is non-conforming with current lateral structural bracing requirements. The proposed structural design will stiffen the wooden roof framing members by replacing the roof sheathing with structural plywood sheathing panels. At the visible interior side, the plywood will be concealed with finish wood panels that will be added to recreate the original visual appearance of the 6" +/- wide siding board interior finishes. An alternate approach could include paint-finished interior surfaces and trim elements.

At the visible exterior roof, the original finish surfaces are difficult to ascertain solely by referencing an available early period photograph; refer to Figure #1 page 1/1. Two finish material options have been considered. For smaller, more economical agricultural structures asphalt roll roofing was commonly in wide use at the 1891 construction date. A more durable material would be to use metal roofing, either corrugated galvanized or a standing seam galvanized metal material. Given the fact that this structure had an "Office" in addition to the size and significance of the structure, a desire for a more durable and fire-resistive performance material would indicate that the metal option would be more in keeping with the Barley Mills Building. Refer to Figure #12, page 21 where the Sanborn Maps specifically call out the roof material as "Corrugated iron." Based on this factual notation and the fire-resistive construction benefit, a recommendation for reconstructing this character-defining commercial material feature is an obvious choice. A consistency with the "Iron" lofts project naming reinforces this theme. Use of required rigid Insulation would be concealed in any case, likely above the structural diaphragm plywood shear panels and the connections to the trusses and URM perimeter walls.

Steel posts will brace the URM exterior walls at the interior spaces, allowing retention of most of the original brick masonry walls appearance. Repair or replacement of the brick masonry walls where necessary of failed masonry units damaged by rising damp or accommodating repairs by previous interior program modifications. Replaced brick units and mortar will match the original material finish, size and color. Necessary new exterior wall openings will be collocated with original openings to minimize removals of original brick façade materials. The proposed structural design uses steel tubes for bracing the URM exterior walls, leaving much of the original brick walls exposed to view.

Reconstruction of original projecting roof canopies at the east, south and west elevations will include new framing and a roof substrate replacing original sheathing, providing lateral load resistance and a finish roofing material of corrugated metal panels. Overall, the visual character of original materials and assemblies will be retained. New program spaces for the proposed adaptive reuse at the interior will be detailed with reveals to separate and differentiate the new construction from the original material conditions. This will emphasize the differing construction and finish.

Structural Summary:

The original 1891 structure footprint that is proposed to be rehabilitated is approximately 56' by 82.' Later 1930 additions to the east and north are poured in place concrete and are proposed to be removed by a controlled demolition to avoid any damages to the existing URM perimeter structure.
The exterior walls of the building are Unreinforced Masonry (URM) construction and act as non-ductile shear walls. There are no anchors observed from the URM walls to the flexible roof diaphragm for out-of-plane anchorage of the URM brick walls. There are gaps between the walls and roofs presumably for ventilation given the wire mesh screening. The perimeter brick walls are supported by shallow spread brick foundations, as are the wood posts supporting the raised wood flooring. An area at the southeast corner has experienced substantial material loss by fire damages.

Quoting from the Structural Assessment Report: "In general, the wood framing of the building is not in good condition. For the roof system the following issues were identified."

East roof truss wood board straight sheathing is compromised or absent; a majority of roof trusses are missing web members; bottom chords of wood trusses at west elevation are split; the wood beam along the centerline of the building has observed deflection and rotation issues; the roof trusses are placed on the brick walls and pilasters and have no out-of-plane bracing anchors; the lateral load path from the straight wood sheathing to the URM shear walls is unknown.

Refer to the structural design approach summary, Appendix Number E: VCA Structural Condition Assessment, Condition Assessment Report dated August 8th, 2023, conclusions dated January 4th 2024 and recommendations dated March 15th 2024.

3 Organization of this Report

The City of Riverside Community Development Department's "Consultant Requirements for Cultural Resources Survey, Studies, and Reports Information Sheet" requires a report analyzing a proposed project's potential impacts on historic resources to include the following background information:

(1) project location (and map);
(2) project description;
(3) research and field methodology;
(4) architectural description;
(5) definition of area history
(6) statement of significance (context statement);
(7) resumes of authors and/or contributors;
(8) DPR forms (if applicable, as an appendix);
(9) list of sources;
(10) discussion of potential impacts;
(11) proposed mitigation measures/recommendations;
(12) current setting; and
(13) evaluation of building's potential merits as a historic resource.

These items are addressed in this Report, the next section regarding assessment of whether the Barley Mills Building qualifies as a historic resource.

Source: https://www.riversideca.gov/historic/pdf/CRResourceStudyRequirements.pdf

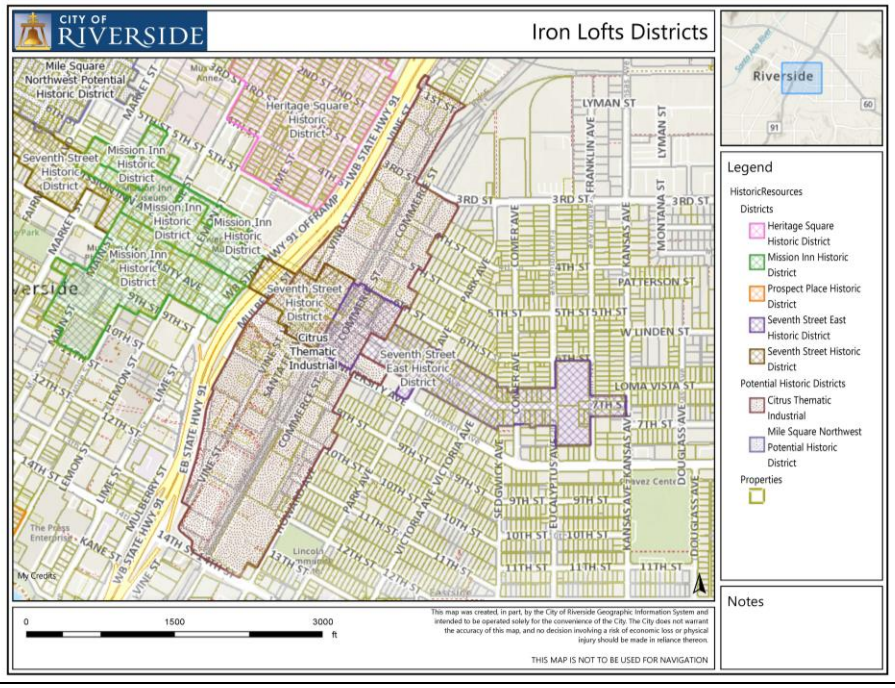


Figure 6 Project Location Map, Historic Resources Districts; detail of site plan.

4 Project Description, Description of Design Intent; Historic Setting; Location Map; Project Description

The proposed Project by Iron Lofts LLC seeks to construct a mixed use development consisting of a single one and two story building, and a single four-story building, providing 300 multi-family units total, including live-work units. These buildings vary in height and have highly articulated façade volumes and third floor level roof top features.

Description of Adaptive Reuse Design

The proposed Iron Lofts Project would also rehabilitate and adaptively reuse the 1891 Barley Mills Building for a proposed Iron Loft Community Space. Located at 3596 Commerce Street the Barley Mills Building is within the eligible "Citrus Thematic Industrial Potential Historic District." The Community space created includes fitness center area, meeting rooms, toilet rooms, showers, and other pool equipment needs. Open area for fitness equipment and lounging passivity all makes use of tall, two-story height volume.

While façades and perimeter interior walls of the Barley Mills Building clearly show evidence of later alterations, notably a mezzanine level at the southern portion of the structure, the original tall, two bay single story structure has a double-bay structure supported by wood frame trusses, terminating at gabled south and north façades. The interior space is open, exhibiting much of the exposed original structure. The clear height of the bottom chords of the trusses above the raised floor gives an opportunity for having new interior spaces distinct and separate from the open original interior plan. The original wall treatment had a plaster finish on the brick masonry perimeter walls. This finish remains at the exterior side of the perimeter walls, but most of the interior perimeter wall surfaces are exposed brick masonry.

Horizontal wood louvres set in a half-circular wooden frame are centered on each gabled bay. A 7-in-12 +/- sloped roof, originally with a projecting wood framed canopy structure was present at the east, west and south façades. Original wood framing brackets remain fastened at the exterior walls and were surveyed to judge their spacing and dimensions in their reconstruction as proposed. Refer to Figure # 8 Page 15. Based on factual information provided in a 1905 Sanborn Fire Insurance map, the roofing of the Barley Mills Building and associated canopies was constructed with corrugated metal.

Historic Setting

The interior spaces are covered by a long-span wood frame truss structure at the original 1891-era portion; wall structures of the later 1930 additions were formed in cast-in-place concrete. The original interior space design was open in plan with an office at the southwest corner. This open plan interior space was heavily modified and altered within the subsequent later programs for commercial uses. One character-defining remnant of this Victorian-era office space are limited remaining examples of the original segmented arched wood window frames and one-over-one double hung wood windows, sills, apron trim and an 8- inch high wood base moulding

trim. These original details will be used for replicating the wood material and profiles. A chimney was added at the southwest corner for a presumed heating unit which was not visible in the photograph dating from 1906 dated photograph.

Description of Design Intent, Summary:
The proposed Iron Lofts Project fronting along Commerce Street from Mission Inn Avenue to the south and from 5th Street to the north is a two and four-story multi-family residential development with 300 housing units and including the historic rehabilitation and adaptive re-use of the historic Barley Mills Building.
Included in this project are three hundred and eighty seven parking spaces, over five thousand square feet of indoor amenities, indoor and outdoor bicycle storage, a gated swimming pool, gated dog park and a roof deck for residents.

Description of Design Intent, Connectivity:
This project will provide the city of Riverside with critically needed housing and a revitalized urban experience. Lots running north along Commerce Street from Mission Inn Avenue to Fifth Street are an area with extensive and untapped opportunity. They are short blocks away from downtown Riverside, one street away from North Park and anchoring the Riverside Marketplace neighborhood. Goals for this proposed development are to tie together the traditional Main Street scale of Mission Inn Avenue to the south and west, with the character of the 7th Street East (Residential) Historic District to the east, complementing the redevelopment efforts within the Downtown area.

Description of Design Intent, Compatibility with the7th Street East (Residential) Historic District:
The 7th Street East (Residential) Historic District is predominantly residential yet historically commercial including two train depots and multiple citrus packing houses. The Iron Loft project vision responds to both the preexisting historic urban character of the community including the evolving context of the single and multiple family residential neighborhoods.

Description of Design Intent, Articulation Methodology:
Iron Lofts provides a thoughtfully articulation methodology that references the scale and size of the nearby single family residences by creating smaller scale units of individual forms and massing. Alternating metal panels, steel, and stucco forms individualized units across their façades references plays of shade and shadows and repetition of porches complementing their primary forms. This strategy reduces scale and keeps the overall structure volume from appearing too massive and is more compatible with the scale of the Seventh Street Residential Historic District to the East.

Description of Design Intent, Materiality Methodology:
Materials and colors speak to the historical significance of the district and the associated current residential revival architecture. Materials incorporated include vertical corrugated siding and steel grate railings. Corten steel panels anchor the corners and at end points, with the use of a calming and neutral warm grey color, giving additional layers and textures to the pedestrian experiences.

Current Setting

The Project site is located partially within the Seventh Street East (Residential) Historic District, providing a transition from the commercial urban character of the immediate vicinity. Commercial structures in this area have been increasingly demolished in the recent past. There is a lesser intensity noted of removals present with the residential scale in the vicinity towards the east.

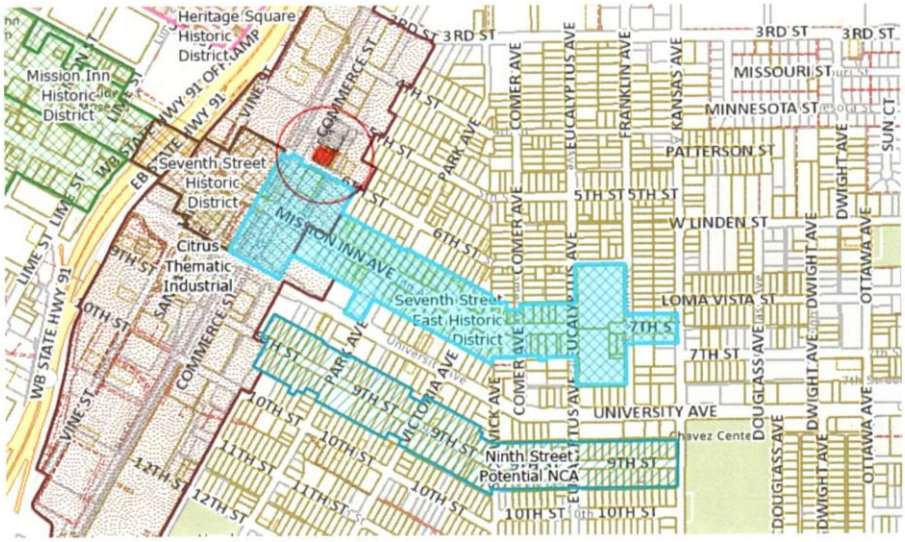
The Project site address is 3051 Mission Inn Avenue. The Barley Mills Building is located at 3596 Commerce Street to the west, Sixth Street and Mission Inn Avenue to the south. As part of the project requirements is the vacating of Sixth Street from Commerce Street to the south towards the project property line to the east.

As a separate part of the city's improved intersection of the BNSF railroad right of way and the Third street at-grade crossing, the City has realigned Commerce Street and lowered the roadway. As a consequence, the blocks between Fourth street and Fifth street were used for the realigned and lowered roadway and removed a section of property originally proposed for a portion of the proposed Iron Lofts site. This resulted in a reduction of 63 residential units and associated parking.

At either side of Commerce Street (originally named Pachappa Street) was an area originally characterized by multiple commercial buildings, including several citrus packing houses. Some of these structures remain, mostly wood framed and wood sided, Type 5 construction structures. Beyond the eastern property line of the Project site along Sixth Street retains the original Single Family Residences dating from the 1910 through 1945 era. A number of these have been converted into multi-family units. There are no extant residential structures within the boundaries of the proposed Iron Lofts project site.

Site context history:
Adjacent to Commerce Street to the southwest of the Proposed project is the routing of the Riverside Irrigating (Gage) Canal No. 1. By December 1875 the Irrigating Canal was 18 miles long, 7 to 8 feet wide at the bottom, 16 to 20 feet wide at the top and 4 feet deep. This canal is now covered.
Refer to Figure #17 page 25.

Seventh Street East Historic District



Physical Description: The Seventh Street East Historic District is one lot deep on both sides of Seventh Street between Commerce Street and Kansas Avenue. Reflecting a cross-section of residential architectural styles from the late nineteenth and early twentieth centuries, the neighborhood is a reflection of both the city's past as well as the lives of average citizens sixty to a hundred years ago. The boundaries of the Seventh Street East Historic District include three City Landmarks, the Ward House, 2969 Seventh Street (built in 1887 by pioneer volunteer fire chief, city councilman, and civic leader George F. Ward), the Collins-Seaton House, 2374 Seventh Street (one of the finest Classical Revival style housed in the city), and the stone house at 2110 Seventh Street (built in 1926, and one of Riverside's best examples of this type of construction). The entire neighborhood has retained an attractive historic character pleasing in its diversity but compatible in scale, age and tone.

District Type: National Register Historic District **Designation Date:**

Survey Results

Survey Date: 5/28/1998 **Period of Significance:** 1880-1945

Significance: The Seventh Street East Historic District is the mile of Seventh Street (Mission Inn Avenue) that runs from Kansas Avenue to the Santa Fe Depot. This Neighborhood includes two City Landmarks, the Ward House at 2969 Seventh Street and the Collins-Seaton House at 2374 Seventh Street. Besides these two landmarks, there are other other focal points of Victorian, Classical Revival, Craftsman, California Bungalow, Mission Revival, and Mediterranean architecture on Seventh Street. With only a few exceptions, architecture between the focal points is complementary. The area designated by the Cultural Heritage Board takes in both the White's and Castlemans' additions to the city. Subdivided in the mid-1880s, this neighborhood took on a more city-like appearance than most areas in the older Mile Square. This was not only because it has a domestic water system earlier (from the Gage Canal) but because most of the Mile Square, in the slow years of colony development, had been sold as full blocks rather tyhan as city lots and was developed as farms and orchards. AS a result, there are still homes that date to the 1880s, while most of the single-family homes in the Mile Square were built post-1900.

Theme: Residential architecture

Report Citation:

References/Citations:

NRHP Status: 5S1 ☐ **NRHP Eligible** **Survey Type:** Intensive Survey

Applicable Criteria:

Figure #7: Location Map: Seventh Street East Historic District Survey Results, showing the proposed Project highlighted in red circle: Barley Mills Building at 3596 Commerce Street.

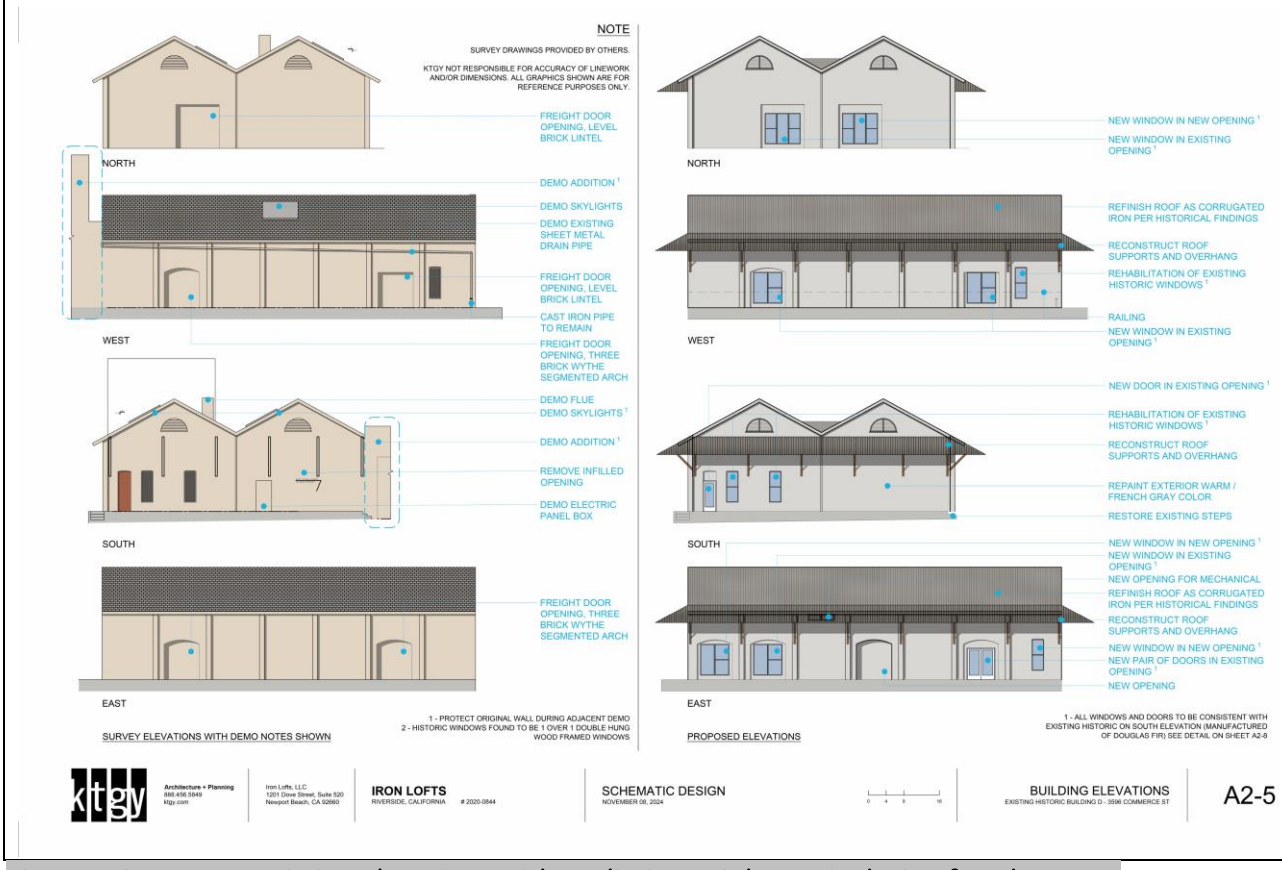


Figure # 8: Current existing elevations with preliminary Schematic design façade notes;
Source: ktgy Architecture + Planning, sheet number A2-5.

The proposed window elevations will be based on the existing remnants of the double hung, 1- over - 1 lite design with a fixed transom lite. Wide freight doors set within a segmented triple-arched head in brick openings. Doors were originally sliding on overhead track panels. New doors will match the height and wood frame jamb and head details as per field documentation. Narrower pass doors were also set within segmented arched head brick openings. Non-original skylights will not be restored.

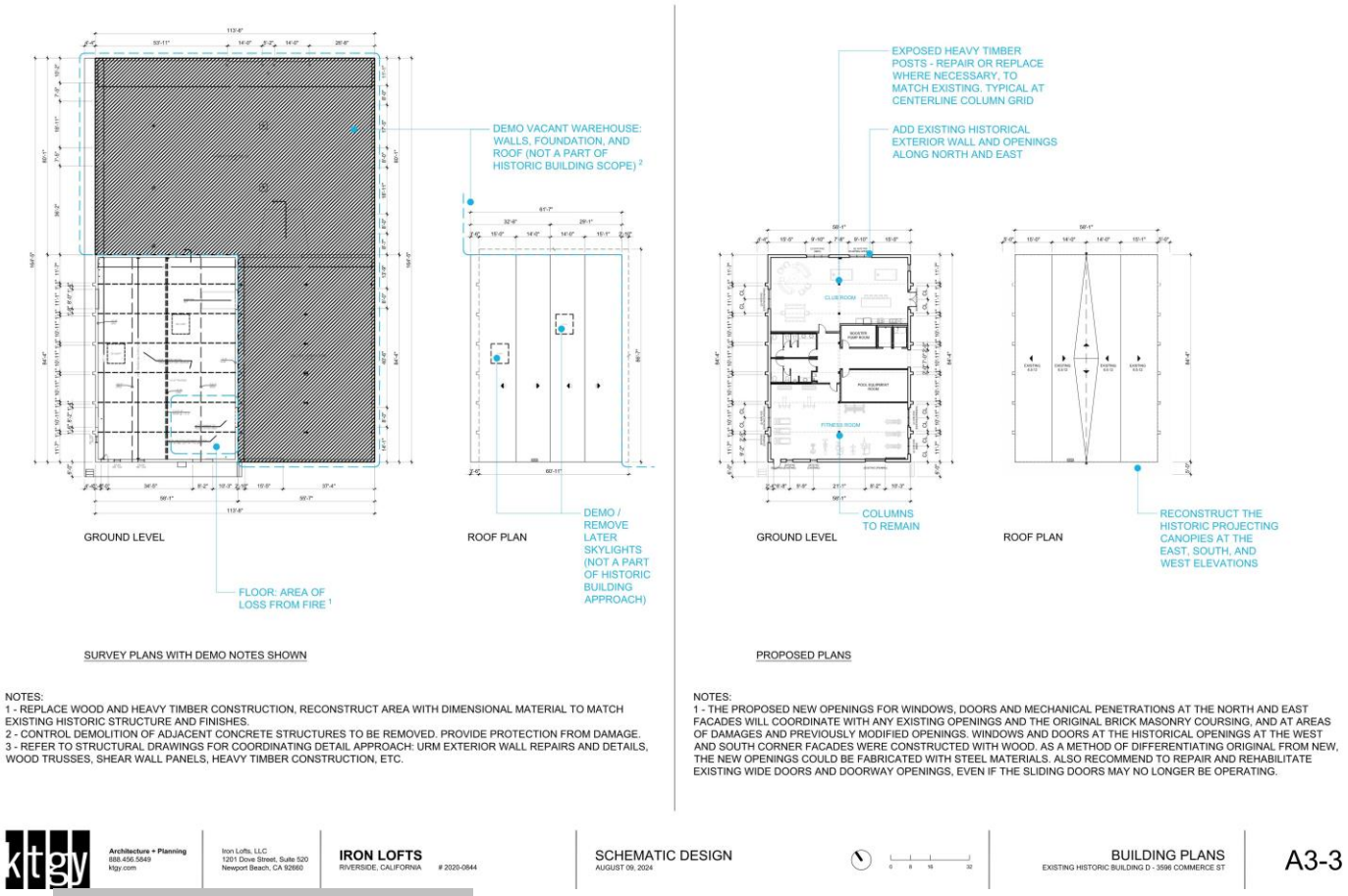


Figure # 9: "Barley Mills Building" at left; Survey plan of existing conditions with "Demolition" Notes; At right; Proposed floor plan and roof plan. Source: ktgy Architecture + Planning, sheet number A3-3.

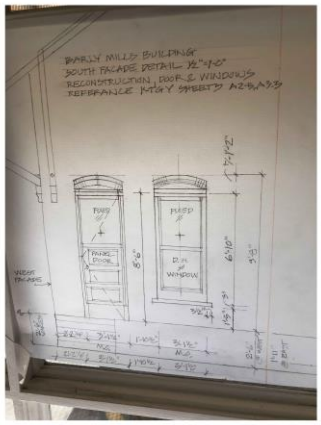


Figure # 9 Barley Mills Building: Reconstruction of c 1891 era doors and windows with dimensions of existing conditions and interpretive canopy roof framing. Proposed section and elevation. Source of field survey, GT Louden Historical Architect; ktgy Architecture + Planning, sheet number A2-8.

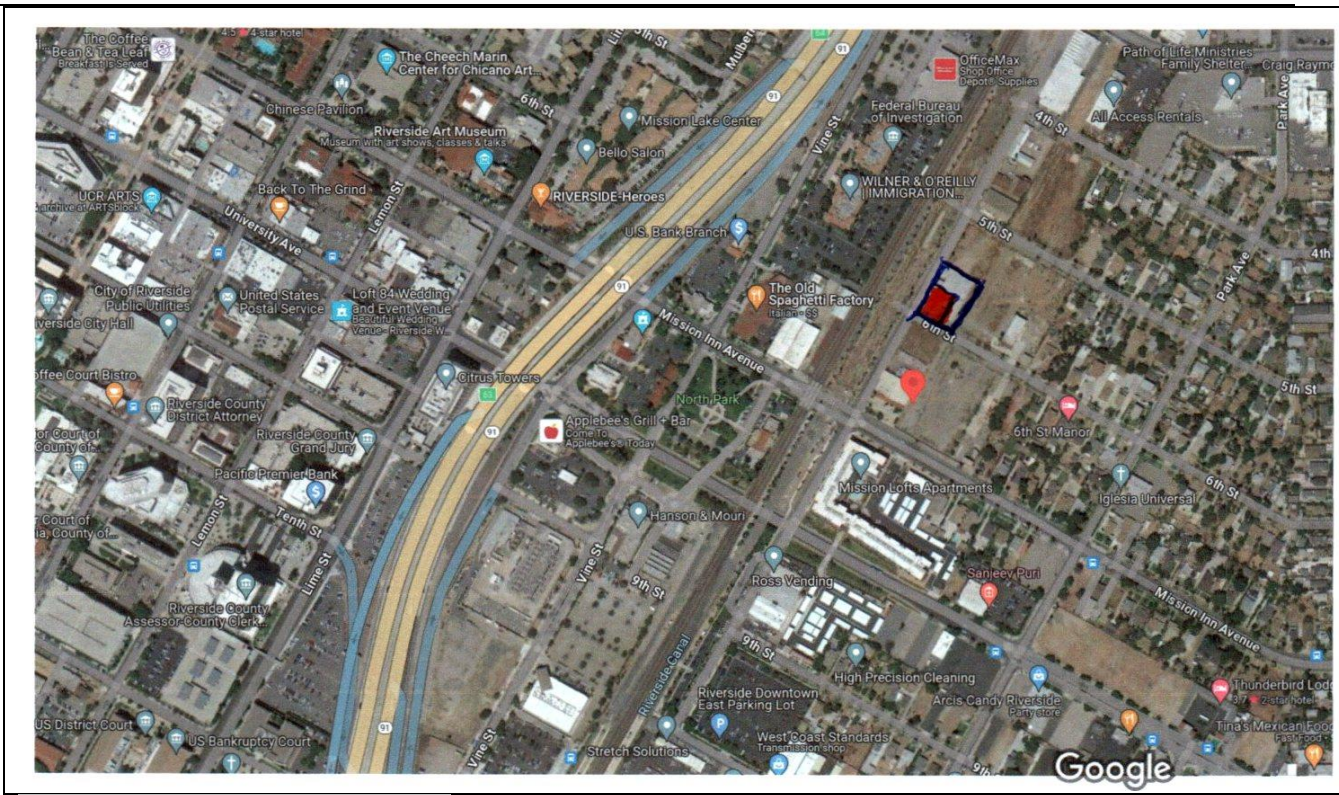


Figure # 10: Source, Google Maps. Note proximity of Project site to State Highway 91 and BNSF railway transportation system. Red marker is located at 3051 Mission Inn Avenue. Across this Avenue is a previous Realm project, Mission Lofts. A red rectangle set within a grey footprint is the Barley Mills Building, subject Project. Residential properties are towards the east at the right; within or immediately adjacent to the Seventh Street East Historic District.

The proposed Iron Loft design is sited adjacent to the overlapping of the Seventh Steet East Historic District and within the "Citrus Thematic Industrial Potential Historic District."

5 Architectural Description and Analysis:

The Barley Mills Building possesses a variety of design and materials combinations, reflective of the substantial additions and alterations made to the original 1891 design and interior configuration. A tall single- story addition at the eastern and northern portions of the original construction was permitted in 1930. This addition has reinforced concrete walls with a type of wood and steel structure retrofitting placed along the east Barly Mills Building facade

Original façade material design conditions are typically 13" thick unreinforced masonry walls with a later application of cement plaster finish at the interior and exterior. The interior brick masonry walls were originally plastered and now are exposed brick masonry, generally unpainted. These will be rehabilitated and repaired as required to match the original materials. Wood framed trusses span from east and west perimeter walls, bearing on 8" square wood posts supporting a beam set along the north/south building centerline. Two subsequent additions dating from 1930 are composed of smooth finish concrete walls with limited openings. At the Barley Mills Building there are wood framed, tall arched headed sliding doors set within a slight recess. There also are remnants of tall wooden double hung windows with a fixed transom window set within a segmented radius head above. A half-circular framed horizontal louvre is centered at each bay of the south façade. Original roof construction is likely to have been finished with either corrugated or standing seam galvanized steel panels and do not conceal any later added mechanical equipment.

The location of the Barley Mills Building and the proposed Project site is at the western side of the corner of Commerce Street, formerly Pachappa, and to the south at Sixth Street. Sixth Street will be vacated for this proposed Project with a hammerhead turnaround at the eastern terminus of the street.

The proposed Iron Lofts Project will include the use of referential and compatible materials and colors of the façade, compatibility of colors, textures, design and materials, and compatibility of scale and massing relative to surrounding structures within the Commercial Zone.

As a part of the proposed Project rehabilitation, the exterior stucco veneer of the original 1891 façade of the Barley Mills Building is proposed to be rehabilitated per the Guidelines of the Secretary of the Interior's Standards (hereafter, SoIS). The proposed Project utilizes offsets in massing and changes of façade materials and colors, thus serving to modulate the massing of the project. New interior construction employs a "hyphen" offset to differentiate the new structure components from original 1891 conditions. This approach is consistent with both the SoIS and the National Park Service (hereafter, NPS) Preservation Brief 14 Guidelines. These standards and guidelines typically apply to structures that qualify as historical resources. The proposed Project has been designed to comply with both the SoIS and the NPS Preservation Brief 14 Guidelines.

One part of the proposed rehabilitation Project of existing Barley Mills Building construction is the proposed reconstruction of original projecting canopies at the west, south and potentially,

interpretively at the east façade. The design intent will restore the original exterior volumetric and functional form of the loading dock adjacencies. The southern and western exposures have a passive environmental benefit for providing a shade break and coverage for doorway openings.

In this case, a canopy reconstruction is interpreted as a horizontal, unifying separation to allow differentiation from the proposed new construction. This proposed Project references the original 1891 design, employing complimentary materials with contemporary finishes, colored exterior surfaces, offset façades and a low-sloped roof massing matching the original existing double gable design.

Comparatively, the heights and building massing as submitted for the proposed Project are similar when comparing and contrasting the proposed Project to the Mission Loft construction built by Realm access Mission Inn Avenue and other structures in the adjacent Commercial zone. Considering recent precedents of City approved additions in historic districts, the Iron Lofts Project addresses how the proposed Project's scale, massing, building materials, and general architectural treatment is compatible with the existing district and new structures that have been rezoned commercially at areas formerly designated as single-family residential.
The proposed Project is a mix of two and four story structures, varying in height, comprising a mixed use for a multi-family development.

The consistency and compatibility of the proposed Project design along with the rehabilitation of the Barley Mills Building references the primary features of the building, including compositions of volumetric massing elements and architectural features of the façades. These include finished concrete and stucco veneer panel façades, aluminum and fiberglass framed windows, and metal louvred ventilation features. These material and wood framed windows ,doors and louvred fenestration features are proposed to be rehabilitated and reconstructed at the west and south façade and gables of the Barley Mills Building.
Materials, scale, height, massing and compositional strategies including their own material identities have informed development of the proposed Iron Loft Project design. Features of the existing structure have been referenced and incorporated into the proposed design, referenced but not directly copied.

The proposed project through preliminary Entitlement /Planning design review by the city addresses an alteration of building massing accomplishing an articulation of the structure to benefit the corner site context at Sixth Street and Commerce Street. A result is this project design including setbacks that acknowledges the adjacency of the original Commerce Street spur railroad tracks along the west façade. There are references made to existing structures, most notably the remaining packing houses. A series of variegated massing volumes, corrugated metal panels and masonry and board -formed concrete facades with limited detailing are all compatible and referential.

Figure # 11: Proposed Iron Loft Façades, Commerce Street and Mission Inn Avenue ", 2024 Entitlement Schematic design submittal; Source ktgy Architecture + Planning sheet A2-0.

Figure # 12: Proposed Schematic Design along Commerce Street showing massing of the historic resource Barley Mills Building, dated November 08 2024;
Note the outline ghost reference of the 1891 structure massing footprint.

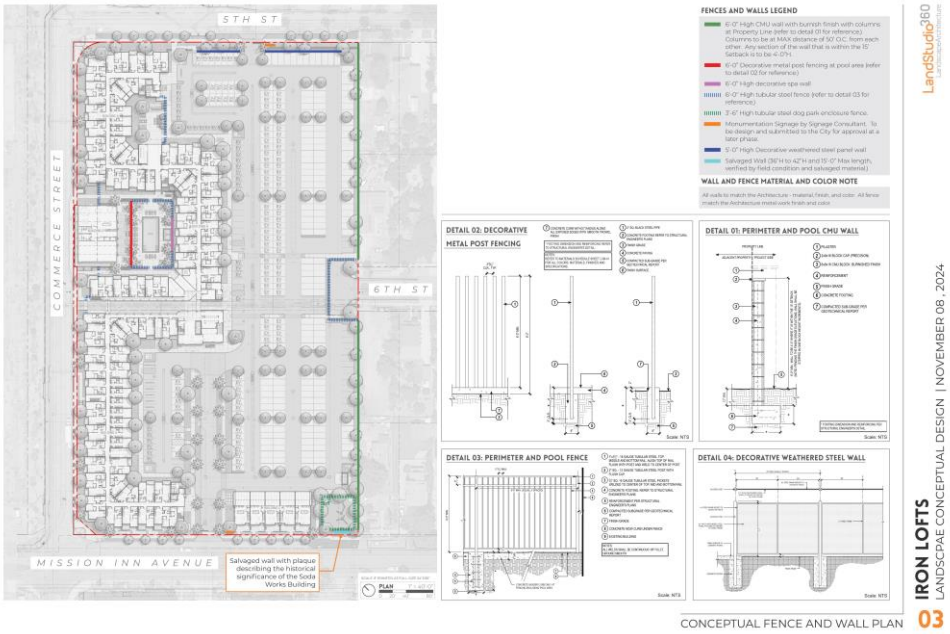


Figure # 13: Landscaping Conceptual Design, dated November 08 2024;
Note the reference to the proposed signage with significance of the Soda Works Building.

6 Site Context / Area History: Barley Mills Building

The site is located in an area that was an early residential development addition towards the east from the railroad tracks and associated commercial structures.

Figure # 14: Sanborn Map, dated February 1895; Source: Library of Congress.
Project site is located at Map area designation no. 7. The railroad tracks define the location of the Barley Mills Building along Pachappa Avenue, later renamed Commerce Street, at the intersection with Sixth Street. An ongoing series of construction projects have modified the original 1891 structure. There have been additions and alterations to the building's east and north facades; these expansions date from c1930 and are now planned for their removal using a reversible approach and with sufficient protection of the original construction with construction shoring of the original brick masonry façades.

Figure # 15: Sanborn Map, Detail; dated January 1952. North is up. Noted that the salmon/reddish color graphic at the upper left corner of Sixth and Commerce streets represents the 1891 Barley Mills Building. Green color represents the 1930 additions. A note stating the entire structure including the 1930 additions was "VACANT." Scrap Metal yard noted to the east.

7 Definition of Period of Significance/ Integrity Analyses/Character-Defining Features

The significance of the Barley Mills Building rests primarily on an association with this c. 1891 commercial structure associated with agriculturally related products and services; refer to the following narrative summary described in the City of Riverside Structure of Merit number 86:

Significance: This building is City Structure of Merit #86, Barley Mills Building. The Barley Mills Building appears in the 1891 Riverside Daily Press Special Edition as Riverside Barley Mills, owned by Hayt & Cox. Then again in the 1893 County Directory as well as the Riverside Reflex Newspaper Special Edition as the Riverside Barley Mills located at "cor[ner] of Pachappa Ave and East Sixth" with proprietors J.H.D. Cox, W.E. Cox and C. W. Curtis. However the office and store address is 725 Main. The directory also shows a feed store, stables and fertilizers at this location under the name of Cox & Curtis. The 1895 Sanborn map shows the structure as a "Feed Mill" and again on the 1908 Sanborn map it appears, but as "Orange Packing". By 1906 Riverside Barley Mills was owned by Henry K. Small & Sons. Riverside Barley Mills became Small's Seed Company by 1921 and by 1925 the property was owned by Hoagland Feed & Fuel Co. From 1934 into the 1950's it was Riverside Grain & Milling Co. and was owned by M.H. & Esther Lerner. This property served the City of Riverside as a coal, barley, hay, citrus packing, grain, feed and fuel company for over 50 years and is one of the oldest buildings left in the area. Due to the property's age and ties to Riverside's strong citrus history in this area, it appears to potentially be eligible for the National Register as an individual building and a contributor to the potential Citrus Industrial Thematic Historic District.

>Noted that a more recent assessment by City Planning in their project review was that eligibility for National Register listing was not recommended.

Although already designated as City Structure of Merit #86 it is eligible for local landmark designation.

Arch Description: The Riverside Barley Mills building is located on the corner of Commerce and Sixth Streets and is a one story structure which is approximately 5,331 sq. ft. The oldest and original part of the building is located at the southwest corner with a parallel gabled roof. The board-formed concrete additions to the original building are on the northern and eastern sides and appear to have been added in 1930 by Cresmer Manufacturing Co. The facades of the original brick building and concrete addition have been covered in stucco. The old Sixth Street canopy and signboards from the 1906 photo have been removed. The parallel gables fronting on Sixth Street feature a half moon louvered vent in each gable end. The southwest side of the building features two segmental arched window openings and a segmental arched doorway space including a transom window above the door. The southeast addition has a large rollup door entryway; the brick facade of the original building can be see when looking inside. The east side of the building (addition) facing Commerce features one original segmental arched and three rectangular (two on the addition, one possibly added to the original brick building) loading rollup doors and one segmental arch window opening. The original brick building also appear to have six shallow buttresses on this elevation. The Commerce Street frontage as well as half the Sixth Street frontage of the building has a concrete elevated loading dock accessed by stairs at the corner of Sixth and Commerce Streets and where it ends on the Sixth Street frontage.

Source: CHB Archive https://aquarius.riversideca.gov/plnimage/Browse.aspx?dbid=2

The structure in its existing condition exhibits much demolition of the interior construction throughout the various agriculturally themed businesses dating back to the original construction date. However, there appears to retain sufficient remaining integrity for the structure to qualify as a historic resource. As such, the city determined the Barley Mills Building qualified as a Local Structure of Merit, number 86. Historian McKenna *et al* applied a period of significance dating from 1891 through 1930 in their assessment. We concur with this suggested designation.

The existing site context includes many vacant lots where commercial structures are no longer extant. A now vacant parcel to the east had most recently been a scrap metal yard. Existing structures added to the east and north of the Barley Mills Building, are 1930 additions to the original 1891 structure, which lack significance. These are scheduled to be demolished as a part of the proposed Iron Loft Project. The Sunkist packing house immediately to the south of the Barley Mills site was photographically documented in the HAER survey prior to its demolition. Details of the roof and canopy showed remaining characteristics associated with its exterior façade and roof massing configuration are similar to the Barley Mills Building; these details have been used for reference in the reconstruction of the original canopy of the Barley Mills Building.

Figure # 16: HAER aerial photo documentation; Source Library of Congress; file HAER CA-121-1; 6/24. View is towards the west; main line railroad tracks bisects the image left to right. The Sunkist Packing House complex is in the left side foreground ; the Barley Mills Building is to the right of the Sunkist Packing House in the right side foreground. Scrap metal yard is in the foreground.

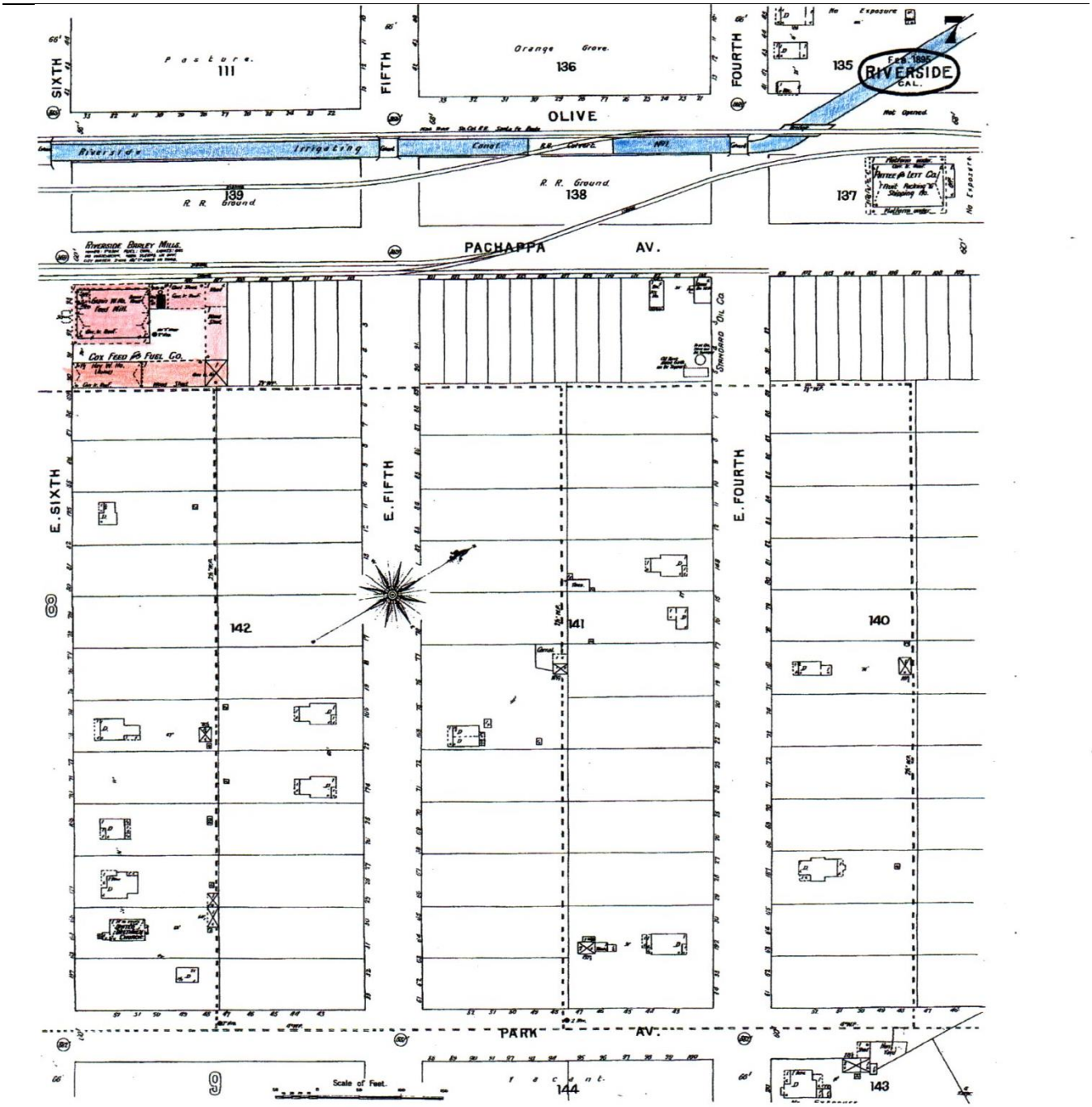


Figure # 17: c February 1895 Sanborn Map site context; north is to the right. Shows the original appearance of canopies at the perimeter of the Barley Mills Building, Cox Feed and Fuel structure are both highlighted in red. Towards the west of the site block between Fifth and Sixth streets and past the railroad right of way grounds were noted as "Pasture." Towards the west of the site, between Fifth and Fourth streets beyond Olive Street was noted as "Orange Grove." Note the limited number of single and multi-family residences between Pachappa / Commerce and Park Avenue.

Site context history:
Highlighted in Blue is the Riverside Irrigating "Gage" Canal No. 1. By December 1875 the Irrigating Canal was 18 miles long, 7 to 8 feet wide at the bottom, 16 to 20 feet wide at the top and 4 feet deep. This Irrigating Canal number 1 has since been covered by a concrete lid.

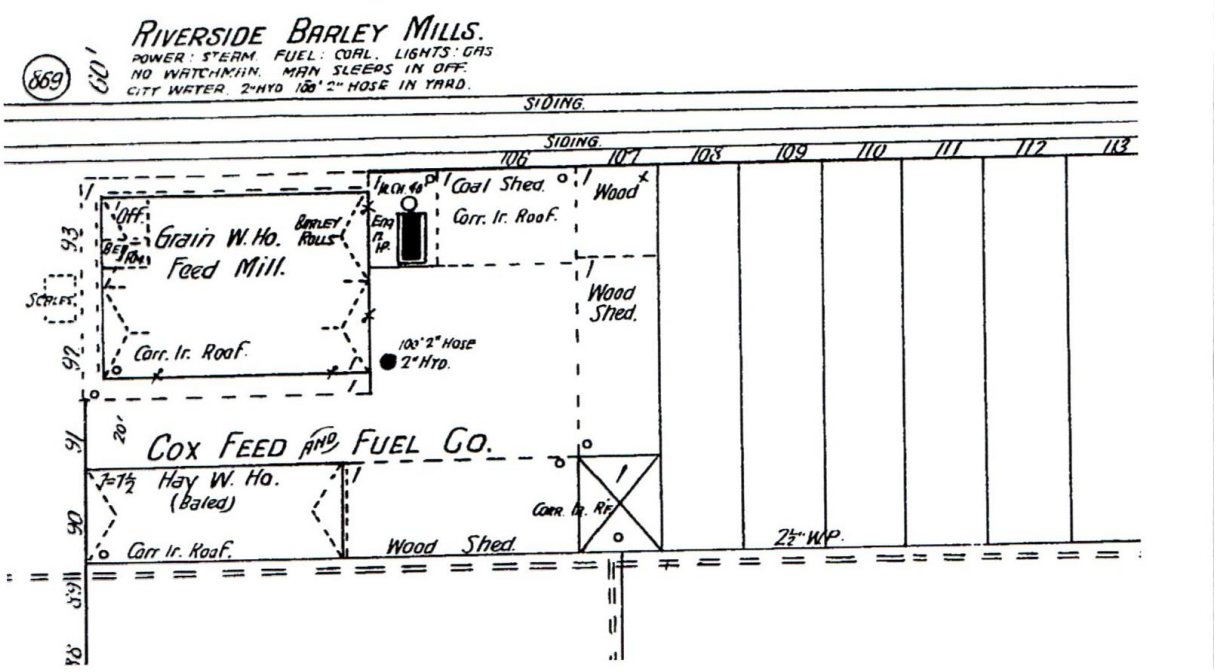


Figure # 18: c 1895 Sanborn Map detail plan; north is to the right. Shows original appearance of canopies at the perimeter of the Barley Mills Building. Dashed lines at three sides of the structure along the west, south and east façades of the Barley Mills Building indicate the original canopy above. Material of canopy roof is noted as Corr. Ir. (Corrugated Iron) Roof. The eastern canopy was removed prior to construction of the 1930 additions. There was a coal shed at the north side of the lot also with a corrugated roof.

Sanborn Maps notation:
Riverside Barley Mills; Power: Steam; Fuel: Coal; Lights: Gas; No watchman, man sleeps in (Office) Bedroom; City water 2nd (Hydrant) 100', 2" Hose in Yard. There are two railway sidings along the west side of the Barley Mills. At the south west corner of the Barley Mills structure was noted as an "Office" with a "Bedroom" for the watchmen next to it. A scale was located at the center of the loading dock at the south façade. The Cox Feed & Fuel Company was located on the lot adjacent to the Barley Mills structure. This structure is most likely to be demolished at the approximate 1930 date of the Barley Mills Building expansion to the north and east.

8 Evaluation of Significance & Context Statement

Currently listed as a City of Riverside local resource, the Barley Mills Building is not presently listed as a historic resource at the national or state levels. Therefore it is not presently considered as a state historic resource under CEQA. Following are criterion used for evaluating and determining eligibility of structures for listing under national, state of California, and local City of Riverside criteria. It is recommended to consider that the City criteria as a Structure of Merit number 86 satisfies the eligibility for significance and that the resource retains sufficient integrity.

9 Eligibility for listing in local, federal or state registers of historical resources

City of Riverside local designation as a Structure of Merit; bolded and underlined text for applicability:

Structure (or Resource) of Merit means:

A. Any improvement or natural feature which contributes to the broader understanding of the historical, archaeological, cultural, architectural, community, aesthetic, or artistic heritage of the City while retaining sufficient integrity; and:

B. Meets one or more of the following criteria:
1. Has a unique location, embodies a singular physical characteristic, or contains a view or vista representing an established and familiar visual feature within a neighborhood, community or area.

2. Is an example of a type of building which was once common but is now rare in its neighborhood, community or area;

3. Is connected with a business or use which was once common but is now rare;

4. Has yielded or may be likely to yield, information important in history or prehistory; or

5. Represents an improvement or Cultural Resource that no longer exhibits the high degree of integrity sufficient for landmark designation, yet still retains necessary integrity under one or more of the landmark criteria to convey cultural resource significance as a structure or resource of merit.

Source: City of Riverside, Municipal Code Chapter 20.50.010 Definition Section.

The Barley Mills Building is not presently listed in the National Register of Historic Places ("NRHP"). The following criteria serves as a guide to evaluate potential entries for the NRHP:

> The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:
>
> A. that are associated with events that have made significant contribution to the broad patterns of our history ("Criterion A"); or
>
> B. that are associated with the lives of persons significant in our past ("Criterion B"); or
>
> C. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction ("Criterion C"); or
>
> D. that have yielded, or may be likely to yield, information important in prehistory or history ("Criterion D").

To qualify as a historic resource, the Barley Mills Building must both (1) possess integrity of location, design, setting, materials, workmanship, feeling and association; and (2) meet one of the significance criteria enumerated in Criterion A through Criterion D. The Barley Mills Building appears to meet sufficient prerequisites for eligibility in the NRHP based on the local City designation.

The Barley Mills Building possesses sufficient integrity to qualify as a historic resource

Under 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." To qualify as eligible for the NRHP, a property must not only meet at least of Criterion A through D, but in addition:

> [A] property must also have "integrity" of "location, design, setting, materials, workmanship, feeling, and association." This means that the property must retain enough of its historic physical character (or in the case of archaeological sites, intact archaeological features) to represent its historic period and associations adequately.

The Barley Mills Building satisfies the criteria for integrity as to design, setting, materials, workmanship, feeling, or association, as discussed below:

Location. A criteria for integrity that the Barley Mills Building meets is that of location—i.e., the building has not been relocated; it is at the same site location now as it was when originally constructed. The fact that the Barley Mills building has not been relocated is sufficient to establish some degree of the integrity of the building, despite the substantial loss of the context and surrounding related built environment.

Design. The Barley Mills Building possesses integrity of design, albeit it has been diminished by later alterations to the building, and material loss by areas of significant fire damage. Notably, there has been alterations of Barley Mills Building's original 1891 interior spaces down to a raised wood floor structure, leaving the exterior brick masonry enclosure shell, wood posts supporting trusses and roof framing with a screened gap between the enclosure wall and the roof enclosure- presumed to provide a natural ventilation source. Alterations of the structure's original window and door openings have been made at both west and south primary façades, including modifications for added electrical infrastructure. An image of the Barley Mills Building's interior is included below; additional images of the interior and altered exterior of the Barley Mills Building can be seen in Appendix D of this Report. Moreover, there have been alterations of window and door openings at both street-facing facades. There are few examples of original windows and sliding wooden "barn" style doors that remain at the south and west façades.

Figure # 19: Interior photographs, 2022 showing non-contributing interior build-out construction prior to their removal. The remains are clear expressions of the spatial volume with trusses, exposed brick walls, and triple- segmented arched masonry doorway openings. Raised wood flooring visible in the foreground is severely damaged by fire at the southeast corner.

Setting. The Barley Mills Building is located towards the western boundary of the Seventh Street East (Residential) Historic District, at the nexus of commercial and residential districts. This structure fronts on Commerce Street, a major connector street aligned with the main line Railroad tracks, an intact and undisturbed transportation setting.

Materials. The Barley Mills Building exhibits limited original material integrity. As referenced earlier, the primary original façade materials are URM brick masonry with later applications of stucco plaster and wood framed doors and double hung windows with arched transoms. These material selections are not present in any of the multiple additions as constructed, and their proposed removal of the 1930 conditions would not affect the overall integrity of significance.

Workmanship, feeling, and association. The Barley Mills Building exhibits integrity of workmanship, feeling, and association that has been compromised and diminished as a result of the multiple additions to the original 1891 design. Original character-defining features of the Barley Mills Building's original design detailing have been compromised by additions and alterations to the north and east façades. The highly visible and undistinguished placement of various plastic skylights, mechanical and electric equipment at the rooftop and façade of the original structure represent a functional and aesthetic dissonance, yet a reversable condition.

Arguably the Barley Mills Building lacks some degree of integrity of design, setting, materials, workmanship, feeling, and association. However, according to local City criteria it still qualifies as a historical resource by meeting one of the four criteria for significance. Additionally, the Barley Mills Building represents a great degree of modifications by numerous agriculturally related uses over the years, with multiple interior alterations. This qualifies as a criterion for significance, specifically for the area of open interior spaces with limited numbers of structural columns that have accommodated multiple programs of use over the decades. This includes the present proposed adaptive reuse program for community uses as a part of the proposed Iron Lofts Project .

Consequent to the criteria listed above, the Barley Mills Building still possesses a criterion of significance necessary to potentially qualify as a National listing as a historic resource.

As necessary to qualify as a historic resource, the Barley Mills Building should meet any of the four criteria used to evaluate a structure's eligibility for listing in the NRHP, as set forth in detail below.

Criterion A: The Barley Mills Building is not considered eligible for listing at the National Level under Criterion A because it is associated with events that have made a significant contribution to the broad patterns of national history.

The "events" associated with the overall program of agricultural production are no longer extant;

Criterion B: The Barley Mills Building is not considered eligible for listing at the National Level under Criterion B because the structure is associated with the lives of persons significant in Riverside's local past.

The "lives of" significant persons associated with the program of agricultural equipment and procurement with functions at this site are no longer relevant, consequent of the removals of the equipment in the open floor plan down to base building shell construction, removing any traces of the original function.

Criterion C: The Barley Mills Building is not considered eligible for listing at the National Level under Criterion C because the structure does not embody distinctive characteristics of a type, period, or method of construction. Most of the multiple additions made over time do not support or represent the work of a master; nor do they possess high artistic values; nor do the additions represent a significant and distinguishable entity whose components may lack individual distinction. The original 1891 structure's architect is unknown.

Criterion D: The Barley Mills building is not likely to be eligible for individual listing at the National Level under Criterion D because it has not yielded, and is not likely to yield, information important in prehistory or history. Given the extent of prior and more recent constructions on site, there is limited potential to yield information important in prehistory or history. This is especially the case given the prior development built on the project site, which included excavation for the structure's foundations from the 1890's through the 1930's. Given the excavation that has already occurred, the Project site is not likely to yield any additional information important to prehistory or history.

For reasons set forth in Criterion D therein, the Barley Mills Building is not eligible for the NRHP.

The Barley Mills building is not listed but is potentially eligible for listing in the California Register of Historic Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register of Historic Resources ("California Register"). The Barley Mills building is not listed in the California Register. To this date the State Historical Resources Commission has not determined that the Barley Mills building is eligible for listing in the California Register.

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 must be at least 50 years of age and 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.Here, the Barley Mills Building is not considered eligible as a historic resource because it retains sufficient integrity reflecting the building's original exterior appearance. The building further does not meet any of the above criteria for the same reasons that the Barley Mills Building does not meet the criteria for the NRHP, as further explained below.

Criterion 1: The Barley Mills Building is potentially eligible for listing in the California Register under Criterion 1 because it is associated with events that have made a significant contribution to local, California, or national history. Specifically, California packing houses and related agricultural uses.

Criterion 2: The Barley Mills Building is potentially eligible for listing in the California Register under Criterion 2 because it is associated with the lives of persons important to local or California history.

Criterion 3: The Barley Mills Building is potentially eligible for listing in the California Register under Criterion 3 because it does embody the distinctive characteristics of a type, period, or method of construction. While arguably it does not represent the work of a "master;" and may not possess high artistic values, the exterior has substantially the same appearance and characteristics as it did within a defined period of significance of 1891 through 1930. These are not atypical conditions for commercial structures that are substantially more than a century old.

Criterion 4: The Barley Mills Building is unlikely to be eligible for listing in the California Register under Criterion 4 because it has not yielded, and it has limited potential to yield, information important in prehistory or history. This is especially the case given the prior development built on the project site,

which included excavation for the building foundations from the 1890's through the 1980's. Given the excavation that has already occurred, and given the demolition of the structure's interior, the project site is not likely to yield any additional information important to prehistory or history.

Barley Mills Building is listed in a local register of historical resources as City Structure of Merit #86.

The City of Riverside has not formally designated the Barley Mills Building for individual listing in the local or California Register. The city has listed the Barley Mills Building as a historic or cultural resource in a local register.

The Barley Mills Building appears to qualify as an eligible "cultural resource" under Title 20 of City Municipal Code

The City's Municipal Code defines a "cultural resource" to mean "improvements, natural features, sites, cultural landscapes, or other objects, which may reasonably be of scientific, aesthetic, educational, cultural, architectural, social, political, military, historical or archaeological significance." (Riverside Municipal Code, § 20.050.010, I.) This definition extends to (1) "designated cultural resources," (2) "eligible cultural resources," and (3) contributing features to Historic Districts and Neighborhood Conservation Areas," all of which are defined in the City's Municipal Code. (Riverside Municipal Code, § 20.050.010, I.) The Barley Mills Building does meet criteria of a "cultural resource," as discussed below.

The Barley Mills Building does qualify as a "designated cultural resource" under the City's Municipal Code

The City's Municipal Code defines a "designated cultural resource" as "any cultural resources that has been designated a City landmark, structure or resource of merit, Historic District, or Neighborhood Conservation Area (prior to 2006); County Landmark, County Historic Preservation District, a California Point of Historical Interest or Historical Landmark; a National Heritage Landmark; or is listed in the National Register of Historic Places or the California Register of Historic Resources." (Riverside Municipal Code, § 20.050.010, M.)

The Barley Mills Building does qualify as an "eligible cultural resource" under the City's Municipal Code

The City's Municipal Code defines an "eligible cultural resource" as "a cultural resource or Historic District which has been determined by the Historic Preservation Officer or Qualified Designee, Board, or City Council to meet the City's designation criteria pursuant to a survey prepared by a professional meeting the Secretary of the Interior's standards which either documents the resource, records the resource on the State Department of Parks and Recreation survey forms, or has been so designated by the California State Historic Preservation Officer." (Riverside Municipal Code, § 20.050.010, N.)

The City's Municipal Code defines a contributing feature to a Historic District or Neighborhood Conservation Area as "a site, improvement, or natural feature that provides appropriate historic context, historic architecture, historic association or historic value, or is capable of yielding important information about the period." (Riverside Municipal Code, § 20.050.010, F.)

There have been significant additions and alterations to the structure's primary street-facing façades at the west, north, east and south elevations; a sufficient degree of original material integrity remains. As noted previously there has been a substantial loss of the Soda Works building's original interior basement, ground, second floor level spaces and exterior enclosures.

Figure # 20: The remaining original south façade interior wood window trim details at the named "office" area of the Barley Mills Structure: wall base and trim cap; window apron, window sill, window jamb trim/sash window weight box. See Appendix D.

10 Discussion of Potential Impacts

The proposed Project would not have a substantial adverse impact on this locally defined historic cultural resource.

As the Barley Mills Building does qualify as a local historic resource, for conformance with the SoIS the proposed Project will retain and rehabilitate the entirety of the Barley Mills Building's north, street facing south, west and east secondary façades. A qualified rehabilitation would be consistent with the Guidelines of the Secretary of the Interior's Standards (SoIS). Refer to Appendix "A." Moreover, new construction elements of the proposed Project will utilize offsets and changes of façade materials and colors, thus serving to modulate the overall massing of the project.
This approach is a recommended, less-invasive approach that is deemed compatible by both the SoIS and the National Park Service (NPS) Preservation Brief 14 Guidelines.

Ultimately, the proposed Project will have no substantial adverse impact on this historic cultural resource.

The Project would not have a substantial adverse impact on the Seventh Street East (Residential) Historic District

The proposed Project will not result in a substantial adverse change in the significance of the Seventh Street East (Residential) Historic District under CEQA. A "substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." (State CEQA Guidelines, § 15064.5(b)(1).) The State CEQA Guidelines then provide that the significance of an historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant.

3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for

inclusion in the California Register of Historic Resources as determined by a lead agency for purposes of CEQA.

(State CEQA Guidelines, § 15064.5(b)(2).)

Here, the proposed Project will not result in a substantial adverse change in the significance of the Barley Mills Building because there would be limited impacts by demolitions or substantial alterations as stated in CEQA for the proposed Project. The site of the Project is largely within the Seventh Street East (Residential) Historic District, and the proposed Project is located within the areas of the site that are barren without structures. Therefore, there will be no impacts in any physical change to this portion of the Historic District. (State CEQA Guidelines, § 15064.5(b)(1).) Additionally, changes to the former Barley Mills Building would not materially impair the significance of the Seventh Street East (Residential) Historic District because, among other reasons, the Barley Mills Building does not convey, or otherwise contribute to, the physical characteristics of the District. The period of significance for the Seventh Street East (Residential) Historic District is defined as 1895 through 1945. The Barley Mills Building was constructed outside of this period of significance in 1891. Accordingly, the Barley Mills Building is a non-contributor to the District and changes to the Barley Mills Building thus do not materially impair the significance of the Seventh Street East (Residential) Historic District. (State CEQA Guidelines, § 15064.5(b)(2).)

Figure # 21: Existing site context, photograph dated 2013; Barley Mills Building twin gables at the south elevation. The 1930 concrete wall addition is in foreground of the southeast corner.

11 Proposed Mitigation Measures

No mitigation measures are proposed for the proposed Project because the Project will not have any substantial adverse impact on a historic resource, and therefore there is no substantial adverse impact necessary to mitigate.

12 Recommendations

The proposed Project as designed incorporates best practices and complies with the Guidelines of the Secretary of the Interior's Standards (SoIS) in the rehabilitation of the original south, north and west façades. Notably, the proposed Project for the Rehabilitation of the Barley Mills Building as designed includes the following character defining features:

1. Details of separation, often described by the NPS as a "hyphen," between new construction and the rehabilitated existing conditions of the Barley Mills Building's existing façades and new interior spaces. This approach serves to identify a strong differentiation between proposed new construction and the historical 1891 structure design.

2. Retain and rehabilitate per SoIS the East, South, West and North façades, including the canopy reconstruction and hardscape paving areas. The original rail spur tracks located along Commerce Street at the west façade of the Barley Mills Building are subject to a new city engineering roadway project that will alter the nearby historical street condition.

3. Retain and rehabilitate per SoIS the north and east façades, given the original 1891 exterior walls will be protected to remain in place during the controlled removal of the adjacent non-significant 1930's concrete structure construction expansion.

4. Retain and photodocument the remaining façade lettering hand painted signage elements at the southwest corner façade.

5. Maintain the arrangement of the raised concrete loading dock structure along the south and west façades and install period-appropriate steel pipe guard rails and handrails.

6. Retain, reconstruct and rehabilitate the Barley Mills Building's original window and door elements, including wood casing, apron and base trim, ventilation louvers, roof drain leaders and cast iron pipe drains.

7. Create a memorial marker for the lost Soda Works structure with interpretive text and images recorded in site surveys and research; repurposing the salvaged cast concrete block units and some heavy timber framing members for use in a fenced dog park for these Iron Lofts residents.

The above recommendations are reflected in the design of the proposed Project. The Project's incorporation of the above-referenced features will serve as a project benefit to the existing 1891 Barley Mills Building design for an adaptive reuse program of an Iron Loft Community space, including the overall site context and proposed MFR.

A-1 A Appendix A: Secretary of the Interior's Standards- Analysis and Application

The City of Riverside Municipal Code requires in Section 20.25.050, item G that Staff shall make findings of the following standards, specifically:

The Secretary of the Interior's Standards for Rehabilitation:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

Noted:

The proposed adaptive reuse program for the Barley Mills Building will creatively rehabilitate and maximize the interior open spaces with minimal changes.

Structural repairs and new interior construction will be designed to create minimal changes, and will be clearly differentiated from the historical materials.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

Noted:

Distinctive materials and spatial relationships that characterize the building will be detailed to remain. In particular: the projecting canopy roof and support framing reconstruction along the west and south façades .

3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

Noted:

A false sense of historical development will be avoided to acknowledge the time, place and original use. No conjectural features from other historical properties will be made.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

Noted:

Changes that have acquired significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

Noted:

Reconstruction of the projecting loading dock canopy at the south and west façades; an interpretive projecting canopy at the east façade, and required structural corrections to the roof framing that reference the original wood framing materials and sizes.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

Noted:

Replacement details such as the structurally compliant trusses that will match the historic construction conditions and appearances.

Where matching areas of failed brick masonry and repointing mortar, matching the existing sound masonry units and repointing mortar color.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

Noted:

Damaging chemical treatments will be avoided. Application of proper testing, dwell times and neutralizing applications will be strictly followed.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

Noted:

No such features or resources have been observed nor documented.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

Noted:

Spatial relationships will be maintained, particularly at new interior construction.

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Noted:

Reversable, or retreatable new construction will be undertaken to maintain the essential form and spatial integrity of the Barley Mills Building.

A-2 B Appendix B: List of Sources and References; Prior Assessments

Preliminay Assessment for Realm of the properties located at 3596 Commerce Street and 2993 East Sixth Street, April 2016, Historian Jeanette McKenna *et al;* Whittier CA.

Library of Congress; Photos from Survey HAER CA-121
https://www.loc.gov/resource/hhh.ca1677.photos/?sp=12&st=image

City Of Riverside Planning Department; sources noted.

A-3 C Appendix C: c.v. of Author / Research and Field Methodology

George Taylor Louden AIA, Inc. (GTL|HA) is a historical architect exceeding qualifications as a historic architect and meeting the Secretary of the Interior's Standards of 36 CFR 61. GTL|HA bases the analysis and conclusions set forth in this report on research, site visit documentations, and the information set forth herein.

Independent Historical Architectural Consulting Practice, GTL | HA, Los Angeles, CA
Principal, Sole Practitioner, Project Manager and Historic Preservation Specialist, 2004 to present

Exceeding qualifications as a historic architect and meeting the Secretary of the Interior's Standards of 36 CFR 61

RELEVANT CONSTRUCTION PROJECT EXPERIENCE

- El Pueblo Historic Monument LA Plaza de Cultura (1883 & 1888), LA County Department of Public Works, 2004-2010
- Will Rogers State Historic Park, Ranch House Rehabilitation and Restoration; 2002-2006
- Will Rogers State Historic Park, Guest House Restoration and Interpretive Center remodel, 2008
- John Marshall High School, (1930), façade repair assessment and Rehabilitation Approach, LAUSD, 2013
- Rouse Building (1895 & 1924) Adaptive Reuse/ Barbara and Art Culver Center of the Arts, UC Riverside 2006-2010
- Imperial Hardware Building, adaptive reuse and façade rehabilitation, Riverside, Ratkovich Development 2015-2017
- Stalder Building, adaptive reuse and façade rehabilitation, Riverside, Regional Properties Inc, 2016-2017
- Iron Loft Buildings, Barley Mills Building adaptive reuse and façade rehabilitation, Riverside, REALM, 2021-->
- Wadsworth Chapel / All Faiths Chapel (1900) Department of Veterans Affairs, West Los Angeles, 2002->
- Los Angeles County Hospital, Patient's Building adaptive reuse, County of Los Angeles, 2013-2014
- El Pueblo / LA Plaza de Cultura, museum interior modifications, LA County Department of Public Works, 2015-2017
- Veterans Administration West Los Angeles Bob Hope Memorial Chapel (1940), Construction Documents, 2015-2018
- Hardison Ranch, stabilization and rehabilitation of historical barn; accessory structures relocation, Santa Paula, CA, 2018>
- Hawthorne Grammar School (1928,) historical assessment and memorandum report, City of Beverly Hills, 2012
- Town of Amboy Historic Structure Report, Route 66/ Mojave Desert, CA; National Park Service, 2007-2009
- Will Rogers State Historic Park, Equestrian Facilities Master Plan document, 2010-2012
- Veterans Administration West Los Angeles Bob Hope Memorial Chapel, Section 106 Review Request, 2015-2016
- Rustic Canyon Rec Center/ Uplifter's Clubhouse (1923), Preservation Master Plan / Historical Society, 2014-2016
- Imperial Hardware Store, Assessment Report, Adaptive reuse and façade rehabilitation, Riverside CA, 2015-2016
- Pasadena Unified School District, San Rafael Elementary School assessment report, Pasadena CA 2016-2017
- Pasadena Unified School District, Linda Vista Elementary School assessment report, Pasadena CA 2016-2017
- West LA VA, Building 33 rehabilitation of 1893 Superintendent's residence for 1887 Fund, Los Angeles CA 2017->
- West LA VA, Wadsworth Chapel restoration construction documentation for 1887 Fund, Los Angeles, CA 2017>
- LAUSD, Hamasaki Elementary School Accessibility Impact study, Los Angeles CA 2018
- LAUSD, 107th Street Elementary School Accessibility Impact study, Los Angeles CA 2018
- Port of Long Beach, "Smokes" structures evaluation and relocation assessment, Mitigation project, Long Beach, 2018>
- Knollwood United Methodist Church (1967) Historic Resource Assessment Report, Los Angeles CA, 2018

PROFESSIONAL MEMBERSHIPS

American Institute of Architects; National Trust for Historic Preservation;
California Preservation Foundation, member, Board of Trustees, 2015->;
Los Angeles Conservancy; The Association for Preservation Technology International;
DSW Volunteer, State of California EMA, Safety Assessment Program;
Partial list of Preservation Offices, City of Los Angeles Planning Department;
Approved Historical Architecture Consultant, City of Beverly Hills
Board Chair and two-term Architect representative for the City of Los Angeles Planning Department, Miracle Mile North Historic Preservation Overlay Zone Design Review Board 2002-2011

AWARDS / RECOGNITIONS

Certificate of Recognition, City of Los Angeles, commended individually for dedicated service in historic preservation efforts of the community, 2010.
Preservation Design Award, LA Conservancy 2001 (Doheny Library)

Preservation Design Award, LA Conservancy 2004 (Old Administration Building)
National Trust for Historic Preservation, Stanford University Projects Recognition 2001 (Encina Hall)
Historic Preservation Award, The Old Riverside Foundation for Historic Preservation, 2010 (Rouse/ Culver Center)

Research and Field Methodology

GTL|HA has documented existing conditions at the project site via photographs of the exterior and interior of the Barley Mills Building, including historical aerial site context images of adjacent parcels, and the Seventh Street East (Residential) Historic District.

GTL|HA conducted intensive-level survey research including photodocumentation and reconnaissance at the Barley Mills Building site and immediate context in 2021 and 2023, reviewing current building and site conditions and including files of documentation of previous modifications to the original construction. We have also reviewed Sanborn Fire Insurance Maps of the property and examined detailed documentation of the existing site and structure. Based on field measurement and non-invasive observations we have determined the design characteristics of the loading dock canopies and support structure.

Disposition of Data includes field notes, survey notes, field documentation photographs, assessor's records, and records
of research related to the current study report for this Historical Resource eligibility assessment. These and subsequently released reports on this property will be retained in the collection of the client and on file at the office of GTL|HA.

Figure # 22: Existing site context, photograph dated 2022; south façade of the Barley Mills Building and the original wood framing supports for the original canopy at south gable and at west façade. Existing chimney at southeast gable is not visible in the 1906 era photograph. This chimney is not proposed for retention without structural retrofitting.

Figure # 23: Landscape Conceptual Design Site Plan; pool area is east of the Barley Mills Building named as "Building D"

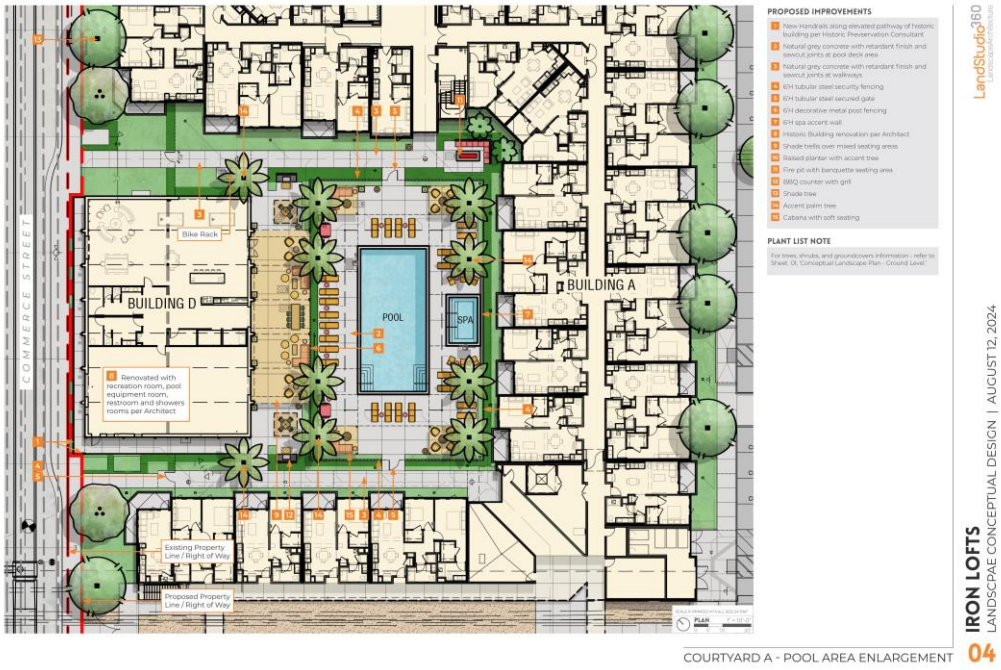
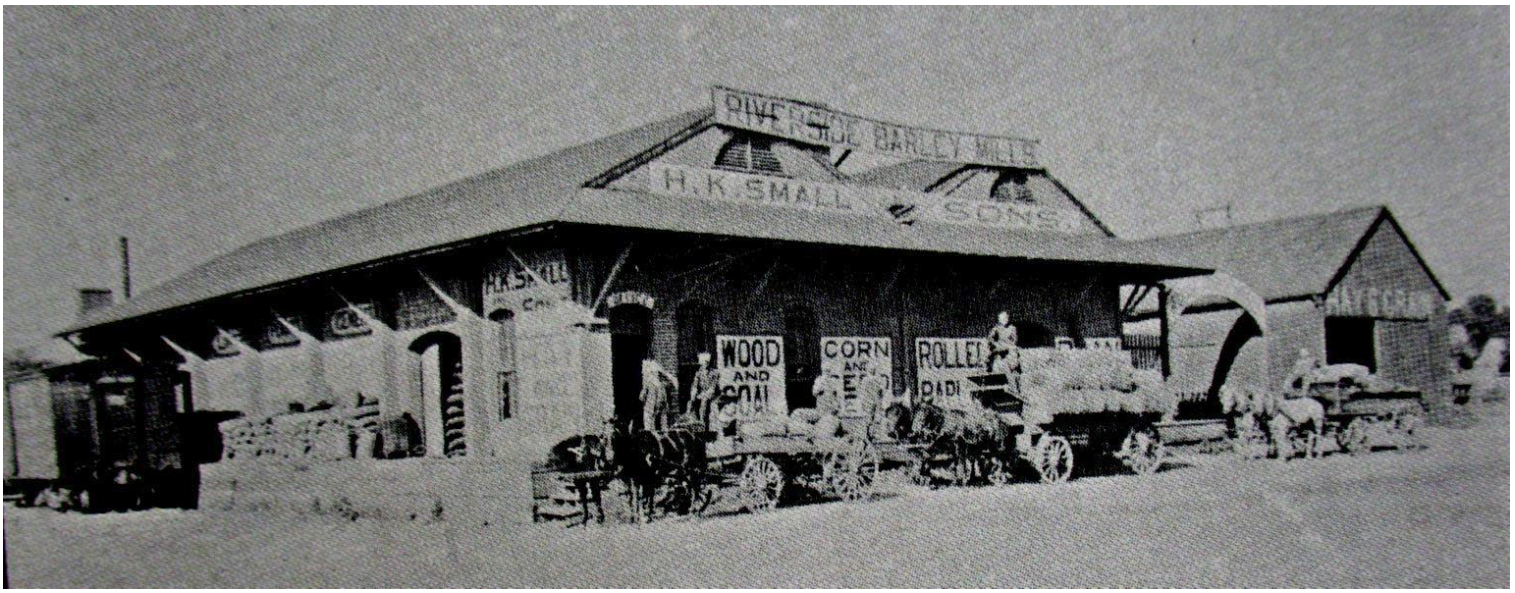


Figure # 24: Proposed site Plan; detail of pool area east of the Barley Mills Building named as "Building D"

A-4 Appendix D: Photographic Documentation of existing and proposed context and Barley Mills Building structure

Iron Lofts Proposed Mixed- use Residential Development for Realm/ Iron Lofts LLC
Design Consult for Proposed Adaptive Reuse and New Construction Development:
Appendice D Document Issue Date/ 12-31-2024/ Page 47/63

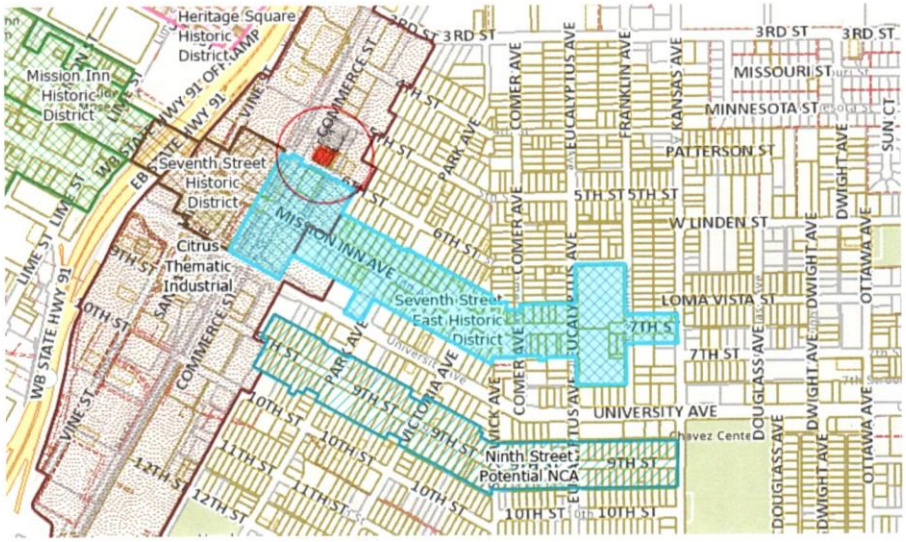


Barley Mills Building context, H. K. Small Sons, southwest façade photograph c. 1906

Figure # D-1: original projected canopy referenced for reconstruction, southwest façade.

Note the segmented brick masonry arched window and doorway openings, painted signage on panels and building façades, arched entrance panel at east façade between Barley Mills Building and the Hay & Grain structure.

Seventh Street East Historic District



Physical Description: The Seventh Street East Historic District is one lot deep on both sides of Seventh Street between Commerce Street and Kansas Avenue. Reflecting a cross-section of residential architectural styles from the late nineteenth and early twentieth centuries, the neighborhood is a reflection of both the city's past as well as the lives of average citizens sixty to a hundred years ago. The boundaries of the Seventh Street East Historic District include three City Landmarks, the Ward House, 2969 Seventh Street (built in 1887 by pioneer volunteer fire chief, city councilman, and civic leader George F. Ward), the Collins-Seaton House, 2374 Seventh Street (one of the finest Classical Revival style housed in the city), and the stone house at 2110 Seventh Street (built in 1926, and one of Riverside's best examples of this type of construction). The entire neighborhood has retained an attractive historic character pleasing in its diversity but compatible in scale, age and tone.

District Type: National Register Historic District **Designation Date:**

Survey Results

Survey Date: 5/28/1998 **Period of Significance:** 1880-1945

Significance: The Seventh Street East Historic District is the mile of Seventh Street (Mission Inn Avenue) that runs from Kansas Avenue to the Santa Fe Depot. This Neighborhood includes two City Landmarks, the Ward House at 2969 Seventh Street and the Collins-Seaton House at 2374 Seventh Street. Besides these two landmarks, there are other other focal points of Victorian, Classical Revival, Craftsman, California Bungalow, Mission Revival, and Mediterranean architecture on Seventh Street. With only a few exceptions, architecture between the focal points is complementary. The area designated by the Cultural Heritage Board takes in both the White's and Castlemans' additions to the city. Subdivided in the mid-1880s, this neighborhood took on a more city-like appearance than most areas in the older Mile Square. This was not only because it has a domestic water system earlier (from the Gage Canal) but because most of the Mile Square, in the slow years of colony development, had been sold as full blocks rather tyhan as city lots and was developed as farms and orchards. AS a result, there are still homes that date to the 1880s, while most of the single-family homes in the Mile Square were built post-1900.

Theme: Residential architecture

Report Citation:

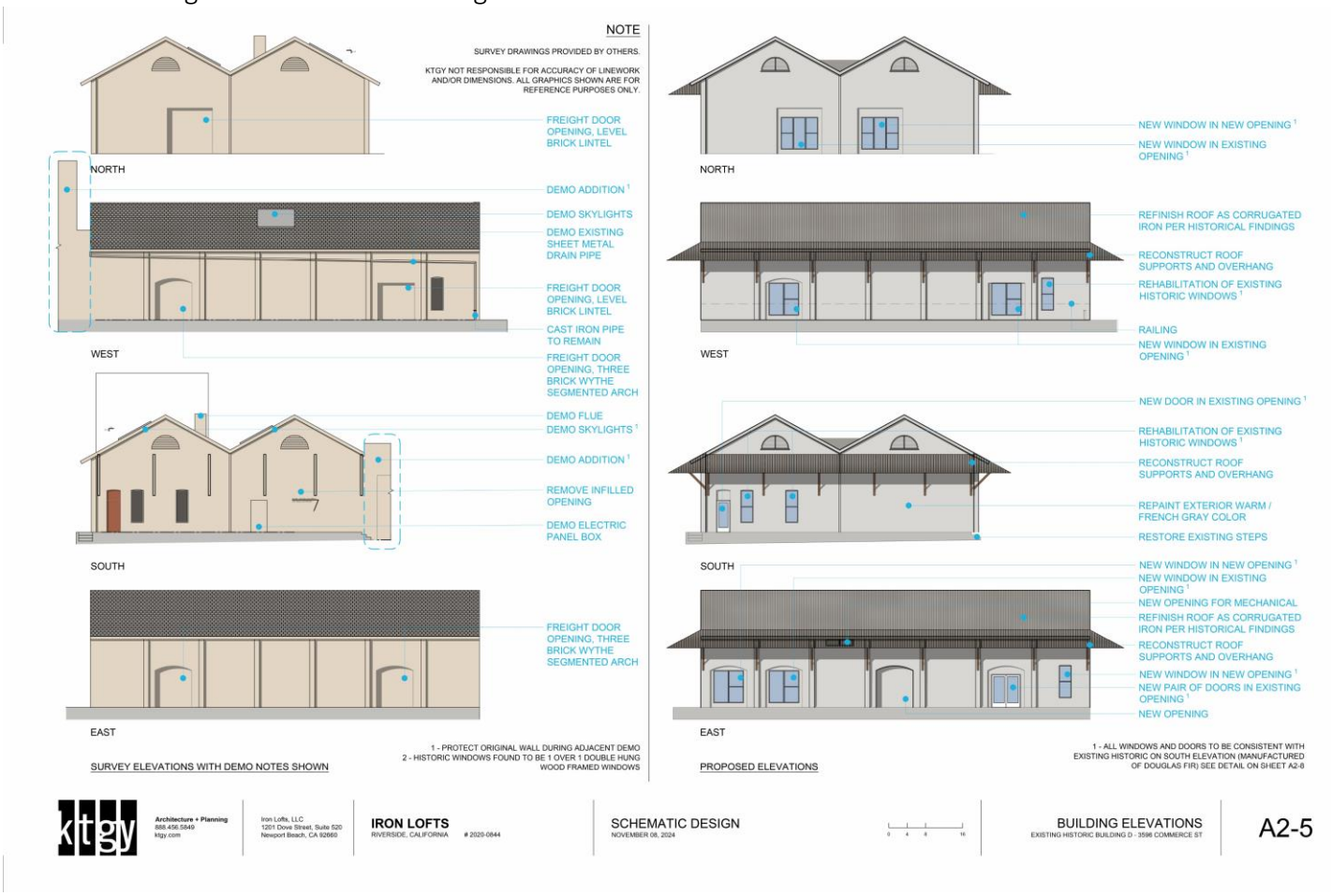
References/Citations:

NRHP Status: 5S1 ☐ **NRHP Eligible** **Survey Type:** Intensive Survey

Applicable Criteria:

Figure # D-2: Location Map: Seventh Street East Historic District Survey Results, showing the proposed Project highlighted in red circle: Barley Mills Building at 3596 Commerce Street.

Figure # D 3: "Barley Mills Building" at left; Survey plan of existing conditions with "Demolition" Notes;
Source: ktdg Architecture + Planning

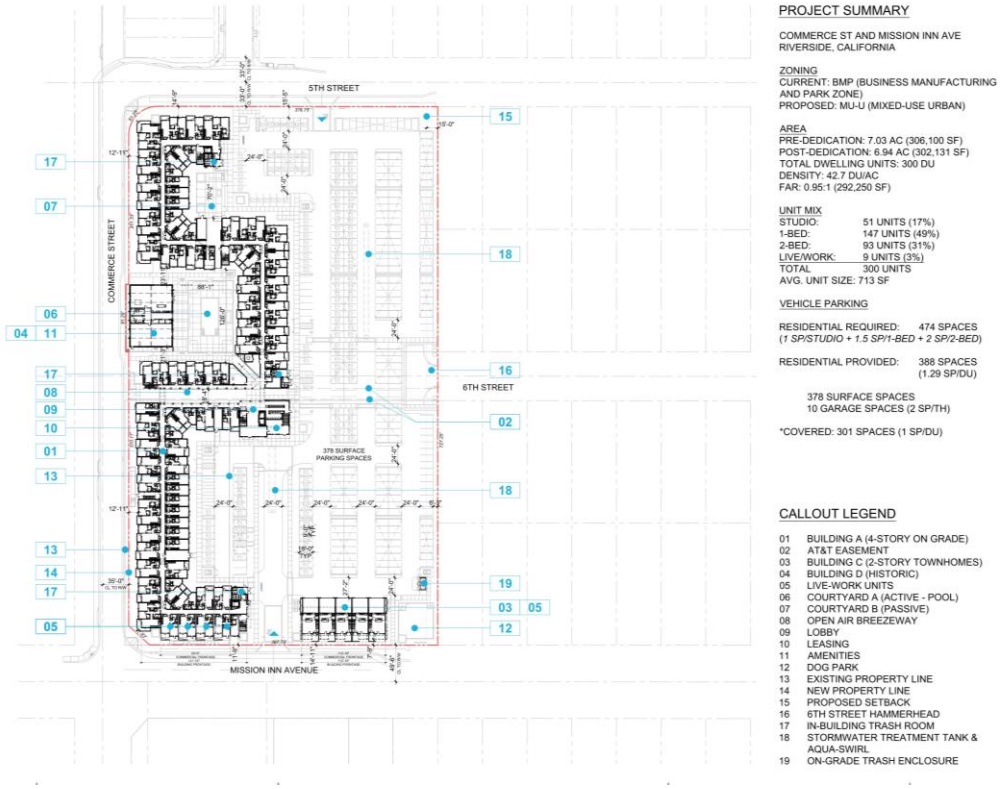


Barley Mills Building: Existing Field Survey elevations at left column and proposed elevations at right side column. Current existing elevations with preliminary Schematic design façade notes are at the left . The proposed window elevations will be based on the existing remnants of the double hung, 1- over - 1 lite design with a fixed transom lite. Wide freight door openings are set within a segmented triple-arched head in brick openings. Freight doors were originally sliding wood panels on overhead street tracks. New doors will match the existing height per field documentation, with steel posts and lintels visually referencing wood frame jambs and head details as per field documentation. Narrower windows and pass doors were set within segmented arched head brick openings. Non-original skylights will not be restored. See Figure D-15.

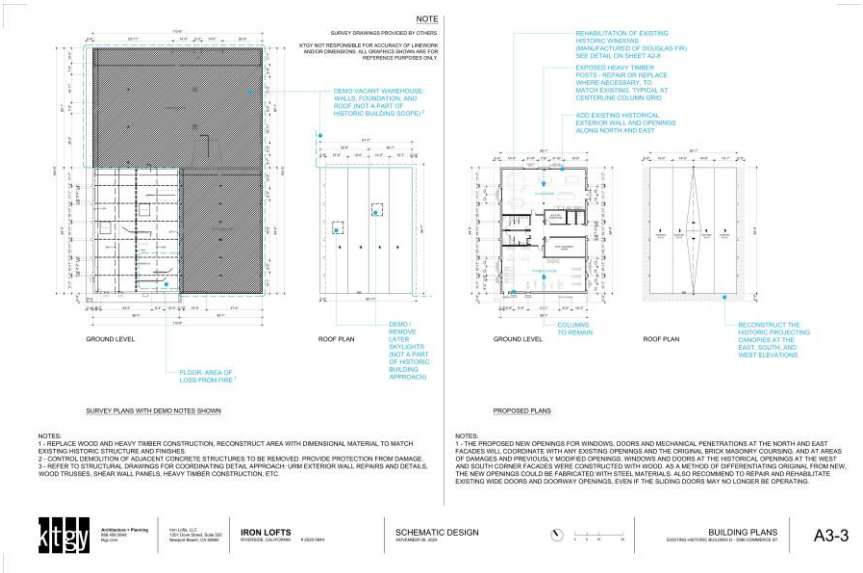
Photographic Documentation of existing and proposed context and Barley Mills Building structure
Source: ktgy/ Architecture + Planning

Proposed design: Commerce Street perspective west facing elevation

Source: ktgy/ Architecture + Planning, Figure # D -4:



Site Plan development with text call-outs and legends
Source: ktgy/ Architecture + Planning Figure # D-5



Barley Mills Building: Survey plans at left column and proposed plans at right column
Source: ktgy/ Architecture + Planning Figure # D- 6

Barley Mills Building, South façade double gable detail.
Source G T Louden AIA Photography, February 2022 ; Figure # D-7

Barley Mills Building: South façade, doubled gable. Parapet to the east is the 1930 concrete addition.
Source G T Louden AIA Photography, February 2022 ; Figure # D- 8

Barley Mills Building: Source G T Louden AIA Measured Drawing December 2024 ;
Area of proposed reconstruction of south façade door and double hung window. Figure # D-9

Barley Mills Building: Source G T Louden AIA Photography, February 2022 ;
Existing Conditions at corner, including wood brackets for attachment of non-extant canopies south façade door and window rough openings; Figure # D-10

Barley Mills Building: Source G T Louden AIA Photography, February 2022;
Southwest corner overview and railroad siding in Commerce Street; Figure # D-11

Barley Mills Building: Source G T Louden AIA Photography, February 2022;
Portion of South façade showing wood frame bolting to the URM wall, supporting non-extant canopy; note the projecting roof overhang that conceals the original continuous roof vent; Figure D-12

Soda Works Building: Source G T Louden AIA Photography, February 2022 ; Figure # D-13
View south of partially remaining north façade and roof collapse from previous fire damage.

Soda Works Building: Source G T Louden AIA Photography, February 2022 ; Figure # D-14
View east of partially remaining west façade and exposed interior showing prior damage by fire.

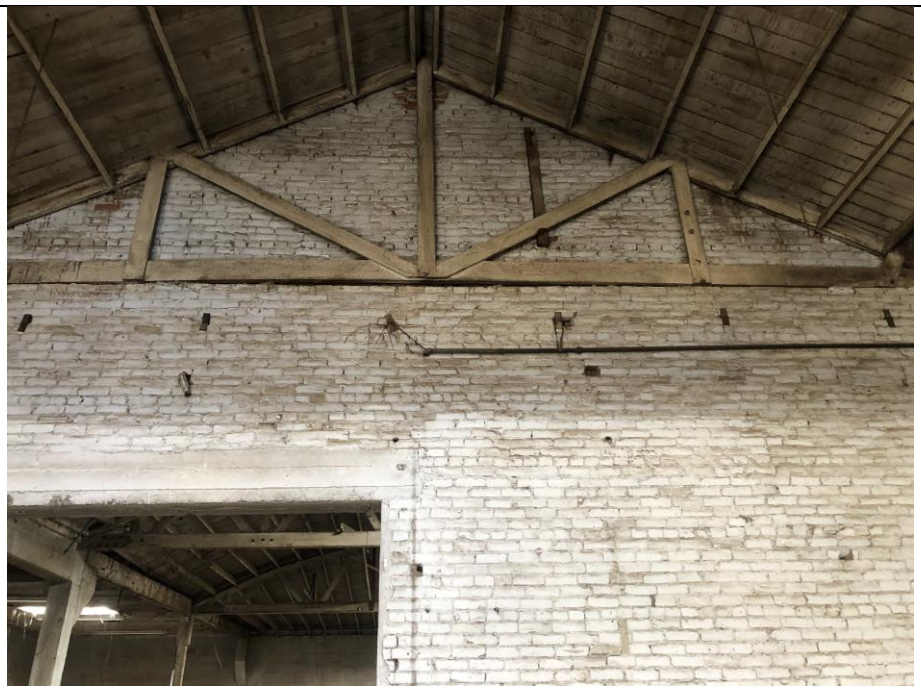
Barley Mills Building Interior: Source G T Louden AIA Photography, February 2022; Figure # D-15
View to east of original triple wythe segmented brick arch opening in original east exterior façade. View through opening is of the concrete walls structure of the later 1930 additions.

Barley Mills Building Interior: Source G T Louden AIA Photography, February 2022;
View to southwest corner of original 1891 structure; note the fire damaged wood floor and joists in near foreground; added mezzanine and interior wood framed enclosed space; Figure # D-16

Barley Mills Building Interior: Source G T Louden AIA Photography, February 2022;
View to south façade of original 1891 structure; note the fire damaged wood floor and joists in near foreground; added mezzanine and interior wood framed enclosed space; note wood roof trusses viewed at location at centerline of the two gables; Figure # D-17

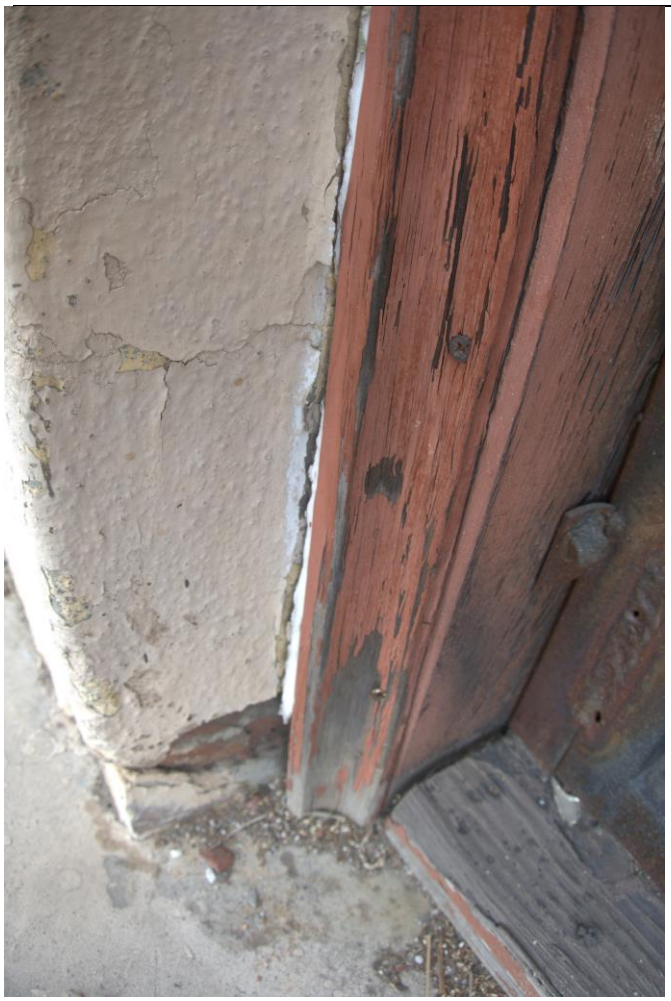
Barley Mills Building Interior: Source G T Louden AIA Photography, February 2022;
View of wood roof framing, board finish at the joists; the south wall brick façade and the half circular vent; the roof openings for skylights are not original and are not proposed to be restored. Figure # D-18

Barley Mills Building Exterior: Source G T Louden AIA Photography, March 2022;
Overview of west façade; the taller mass at the left side is part of the 1930 era addition; skylights are not original and are not proposed to be restored. Figure # D-19



Barley Mills Building Interior: Source G T Louden AIA Photography, March 2022;
Overview of north façade; note the truss members are slightly recessed in the brick wall. Note the opening with a steel head lintel, indicating this was a newly creating opening. Figure # D-20

Barley Mills Building Interior: Source G T Louden AIA Photography, March 2022;
Interior view of south east façade, near the corner; note the brick masonry foundations have failed at the original west façade opening at the former exterior doorway jamb; Figure # D-21.



Barley Mills Building Exterior Window wood trim: Source G T Louden AIA Photography, November 2103; Detail of window jamb, plaster veneered brick recess and sill. Figure # D-22

Barley Mills Building Interior : Source G T Louden AIA Photography, November 2103; Detail of window jamb, sill, apron trim weight box and plaster veneered brick recess at base trim. Figure # D-23

A-5 Appendix E: VCA Structural Condition Assessment

See Appendix attachment.

FINAL DOCUMENT ISSUE DATE: 03-07-2025

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