

4.2 CULTURAL RESOURCES

INTRODUCTION

This section of the Draft EIR examines the potential for the proposed Project's to result in impacts to cultural resources, including archaeological, paleontological, and historic resources. This section relies on information from the *Historical Resources Assessment and CEQA Impacts Analysis for CFT Mission Bell Center Mixed Use Project* (Historical Report), dated July 13, 2017, by Environmental Science Associates (ESA) provided as **Appendix C** to this Draft EIR.²²

ENVIRONMENTAL SETTING

Regulatory Framework

Historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification and, in certain instances, protection of historic resources. Additionally, states and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities. The primary federal and State laws governing and affecting preservation of historic resources of national, State, regional, and local significance are the National Historic Preservation Act (NHPA) of 1966, as amended; the California Environmental Quality Act (CEQA); and the California Register of Historical Resources (California Register), Public Resources Code (PRC) 5024. As archaeological resources are also considered historic, regulations applicable to historic resources are also applicable to archaeological resources and are discussed and analyzed in this section. Descriptions of these relevant laws and regulations are presented below.

a. Federal

Archaeological Resources Protection Act

The intent of the Archaeological Resources Protection Act of 1979 (ARPA) is to ensure preservation and protection of archaeological resources on public and Native American lands.¹ ARPA places primary emphasis upon a Federal permitting process in order to control the disturbance and investigation of archaeological sites on these lands. In addition, ARPA's protective provisions are enforced by civil penalties for violation of the Act.

Under this regulation, the term "archaeological resources" include but are not limited to:

1 16 United States Code (USC). sec. 470aa–470mm, Archaeological Resources Protection Act of 1979, Public Law (PL) 96-95, as amended.

pottery, basketry, bottles, weapons, weapon projectiles, tools, structures or portions of structures, pit houses, rock paintings, rock carvings, intaglios, graves, human skeletal materials, or any portion or piece of any of the foregoing items. Nonfossilized and fossilized paleontological specimens, or any portion or piece thereof, shall not be considered archaeological resources, under the regulations under this paragraph, unless found in an archaeological context. No item shall be treated as an archaeological resource under regulations under this paragraph unless such item is at least 100 years of age.²

ARPA mandates consultation procedures before initiation of archaeological research on Native American lands or involving Native American archaeological resources. Section 4(c) requires Native American tribes be notified of possible harm to, or destruction of, sites having religious or cultural significance to that group. The Federal land manager must notify affected tribes before issuing the permit for archaeological work. Section (g)(2) specifies that permits to excavate or remove archaeological resources from Indian lands require consent of the Native American or Native American tribe owning or having jurisdiction over such lands. The permit, it is also stipulated, must include such terms and conditions as may be requested by the affected Native Americans.

Concerning the custody of archaeological resources, ARPA stipulates that any exchange or ultimate disposition of archaeological resources excavated or removed from Native American lands must be subject to the consent of the Native American or Native American tribe that owns or has jurisdiction over such lands.

Paleontological Resources Preservation Act

In 2009, the Paleontological Resources Preservation Act (PRPA) became law when President Barack Obama signed the Omnibus Public Land Management Act of 2009, Public Law 111-011.³ The PRPA requires the secretaries of the interior and agriculture to manage and protect paleontological resources on federal land using scientific principles and expertise. The PRPA includes specific provisions addressing management of these resources by federal agencies. It provides authority for the protection of paleontological resources on federal lands, including criminal and civil penalties for fossil theft and vandalism. The PRPA only applies to federal lands and does not affect private lands.

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- 2 16 USC sec. 470aa–470mm, Archaeological Resources Protection Act of 1979, Public Law 96-95, as amended, sec. 3, accessed July 2018, available at https://www.nps.gov/subjects/historicpreservation/upload/NPS_FHPL_book_online.pdf.
 - 3 PL 111-011, tit. VI, subtit. D on Paleontological Resources Preservation (known by its popular name, the Paleontological Resources Preservation Act) (123 Stat. 1172; 16 USC 470aaa).

National Historic Preservation Act

The 1966 NHPA authorized formation of the National Register of Historic Places (National Register) and coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. Buildings, districts, sites, and structures may be eligible for listing in the National Register if they possess significance at the national, State, or local level in American history, culture, architecture, or archaeology and, in general, are more than 50 years old. Significance is measured against the following established criteria (National Register Bulletin 16):

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

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. A Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation (ACHP), an independent federal agency, administers the review process, with assistance from the State Historic Preservation Offices (SHPOs). If any impacts are identified, the agency undergoing the project must identify the appropriate SHPO to consult with during the process.

The ACHP includes requirements for consultation with Native American tribes when federal agencies are undertaking an activity that could cause harm to a historic resource or a potential historic resource under Title 36 of the Code of Federal Regulations, Part 800, Protection of Historic Properties, which became effective January 11, 2001.

National Register of Historic Places

The National Register was established by the NHPA, as “an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”⁴ The National Register recognizes properties that are significant at the national, State, and/or local levels.

4 36 Code of Federal Regulations (CFR), pt. 60.2.

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria: (a) Associated with events that have made a significant contribution to the broad patterns of our history; or (b) Associated with the lives of persons significant in our past; or (c) Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or (d) Potential to yield information important in prehistory or history.⁵

b. State

California Public Resources Code

Archaeological, paleontological, and historical sites are protected pursuant to a wide variety of State policies and regulations enumerated under the PRC. In addition, cultural and paleontological resources are recognized as a nonrenewable resource and, therefore, receive protection under the PRC and CEQA.

As part of the determination made pursuant to PRC Section 21080.1, the lead agency shall determine whether the project may have a significant effect on archaeological resources (PRC Section 21083.2). PRC Section 21083.2(b) provides the following guidance on how to mitigate or avoid the significant effects that a project may have on unique archeological resources, stating:

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

- 1. Planning construction to avoid archaeological sites.*
- 2. Deeding archaeological sites into permanent conservation easements.*
- 3. Capping or covering archaeological sites with a layer of soil before building on the sites.*
- 4. Planning parks, greenspace, or other open space to incorporate archaeological sites.*

5 36 CFR, pt. 60.4.

As defined within PRC Section 21083.2(g), “unique archaeological resource” means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

As defined in PRC Section 21083.2(h), “nonunique archaeological resource” means an archaeological artifact, object, or site that does not meet the criteria in subdivision (g). A nonunique archaeological resource need be given no further consideration other than the simple recording of its existence by the lead agency, if it so elects. Pursuant to PRC Section 21083.2(i), as part of conditions imposed for mitigation, a lead agency may make provisions for archaeological sites accidentally discovered during construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required under the provisions set forth in this section. Construction work may continue on other parts of the building site while archaeological mitigation takes place.

If additional archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.

Personnel of the proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.

- Distinctive features, finishes, and construction techniques or examples of skilled craftsmanship which characterize an historic property shall be preserved.
- Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive historic feature, the new feature shall match the old in design, color, texture, and other visual qualities, and where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

- Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
- Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
- New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
- New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

State regulations mandate protection of paleontological resources on public lands, and CEQA requires evaluation of impacts to paleontological sites. Paleontological resources are also subject to certain State regulations for historical resources. Appendix G of the CEQA Guidelines provides guidance relative to significant impacts on paleontological resources, indicating that a project would have a significant impact on paleontological resources if it were to disturb or destroy a unique paleontological resource or site or unique geologic feature. Section 5097.5 of the PRC specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, California Penal Code Section 622.5 sets the penalties for the unlawful damage or removal of paleontological resources.

California Register of Historical Resources

The California Register is the authoritative guide to the State's significant archaeological and historical resources. It closely follows the eligibility criteria of the National Register but deals with State- and local-level resources. The California Register serves to identify, evaluate, register, and protect California's historical resources. For purposes of CEQA, a historical resource is any building, site, structure, object, or historic district listed in or eligible for listing in the California Register (Public Resources Code, Section 21084.1). As stated in the PRC, a resource is considered eligible for listing in the California Register if it meets any of the following criteria:

- a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.*
- b) Is associated with the lives of persons important in our past.*
- c) Embodies the distinctive characteristics of type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.*

- d) *Has yielded, or may be likely to yield, information important in prehistory or history [Public Resources Code Section 5024.1(c)].*

Historical resources meeting one or more of the criteria listed above are eligible for listing in the California Register. In addition to significance, resources must have integrity for a period of significance—the date or span of time within which significant events transpired or significant individuals made important contributions. Important archaeological resources are required to be at least 50 years old to be considered. “Integrity is the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance.” Simply put, resources must “retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance.”⁶

CEQA also requires the lead agency to consider whether there is a significant effect on unique archaeological resources that are not eligible for listing in the California Register. As defined in CEQA, a unique archaeological resource is:

an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. *Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.*
2. *Has a special and particular quality such as being the oldest of its type or the best available example of its type.*
3. *Is directly associated with a scientifically recognized important prehistoric or historic event or person.*

If an archaeological resource is found eligible for listing in the California Register, then it is considered under CEQA to be a historic resource that needs to be protected. This may also apply to unique archaeological resources. If a historic resource may be impacted by activity, under CEQA, avoidance and preservation in place is the preferred alternative. If that is not possible, then a data recovery plan will need to be created and enacted to lessen impacts to the environment to a less than significant level. If the archaeological resource is not eligible for listing in the California Register, and it is not a unique archaeological resource, then no further action is required to protect or mitigate possible impacts to it.

6 Secretary of the Interior's Standards and Guidelines, Archeology and Historic preservation. 1983.

California Environmental Quality Act

CEQA and the CEQA Guidelines have specific provisions relating to the evaluation of a project's impact on historical and unique archaeological resources.

PRC Section 21084.1 and Section 15064.5 of the CEQA Guidelines together establish the prevailing test for determining whether a resource can or must be considered a historical resource under CEQA. First, a resource is considered a historical resource for purposes of CEQA if it is listed or "deemed eligible for listing" in the California Register by the State Historical Resources Commission (SHRC).⁷ Second, it will be considered a historical resource, based on a presumption of significance, if it is either (1) listed in a local register of historic resources as defined in PRC Section 5010.1.4, or (2) identified in a local survey of historic resources meeting the criteria set forth in PRC Section 5024.1.5. If a resource meets either of these criteria, the lead agency must treat the resource as historically significant unless the "preponderance of the evidence" indicates that the resource is not historically significant. Third, a lead agency may find a resource to be a historical resource even though it is not formally listed in the California Register, listed in a local register, or identified in a local survey.⁸ Any such determination must be based on substantial evidence in light of the whole record.

CEQA also provides further guidance with respect to historical resources of an archeological nature and unique archaeological resources. A unique archeological resource is defined in PRC Section 21083.2(g) as:

[A]n archaeological artifact, object or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, (2) has a special and particular quality such as being the oldest of its type or best available example of its type, and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

According to the CEQA Guidelines Section 15064.5(b): "A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." This section of the guidelines defines historical resources as including both the built environment and archaeological resources.

7 PRC sec. 21084.1 and 15064.5

8 PRC sec. 21084.1; sec. 15064.5(a)(3)(4)

A substantial adverse change is defined in the CEQA Guidelines Section 15064.5(4)(b)(1), as “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.” The significance of an historical resource is materially impaired, according to the CEQA Guidelines Section 15064.5(4)(b)(2), when a project:

- A. *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*
- B. *Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of the evidence that the resource is not historically or culturally significant; or*
- C. *Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.*

The CEQA Guidelines provide that “generally,” a project that follows the Secretary’s Standards “shall be considered as mitigated to a level of less than a significant impact on the historical resource.”

At the same time, however, a failure to precisely conform to the Secretary’s Standards in all respects does not necessarily mean that a project necessarily has a significant adverse impact on historical resources. There are circumstances where a project impacting historical resources may fail to conform to the Secretary’s Standards, and yet the lead agency can conclude based on substantial evidence that the overall impact is insignificant because the project does not “materially impair” the historical resource within the meaning of Section 15064.5(b).

CEQA Guidelines Section 15064.5 subsection (c) addresses impacts on archaeological sites. That section provides as follows:

- (1) *When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).*
- (2) *If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.*
- (3) *If an archaeological site does not meet the criteria defined in subsection (a) but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.*

For historical resources of an archaeological nature, “preservation in place is the preferred manner of mitigating impacts to archaeological sites.”⁹ “When recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provisions for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.” In practice, the California Office of Historic Preservation (OHP) has consistently determined that excavation, coupled with implementation of a data recovery plan, does not result in a significant environmental impact on a historical resource of an archaeological nature.

If a project would cause “damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state....To the extent that unique archaeological resources are not left in an undisturbed state, mitigation measures shall be required as provided in this subdivision.”¹⁰ CEQA Guidelines Section 15064.5(f) provides that “a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction.”

CEQA Guidelines Section 15064.5(d) specifies a process for evaluating human remains, and this issue is identified on the CEQA Checklist as an issue for evaluation in environmental documents. In addition, the

⁹ CEQA Guidelines sec. 15126.4(b)(3)(A).

¹⁰ PRC sec. 21083.2(b) and (c)

CEQA Checklist identifies the presence of paleontological resources as an environmental concern that needs to be considered.

State Health and Safety Code

If human remains are encountered unexpectedly during implementation of a project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98.¹¹

If the remains are determined to be of Native American descent, the following procedure must be observed:

- a) The immediate vicinity must be secured according to generally accepted cultural or archaeological standards or practices.
- b) The coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- c) The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the Project Applicant, inspect the site of the discovery of the Native American remains and may recommend means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods.
- d) The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the Project Applicant to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. The area must not be damaged or disturbed by further development activity until the Applicant has discussed and conferred with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.
- e) If the Project Applicant or his or her authorized representative rejects the recommendation of the MLD, the Project Applicant or MLD may request mediation per Subdivision (k) of PRC Section 5097.94.
- f) If the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the mediation provided for in Subdivision (k) of PRC Section 5097.94, if invoked, fails to provide reasonable treatment, then the human remains and items associated with Native American human remains must be interred with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

¹¹ California Health and Safety Code, sec. 7050.5 and 5097.98

c. Local

City of South Pasadena

General Plan

The General Plan serves as a blueprint for planning and development in the City and indicates the community's vision for the future.

The Historic Preservation Element is intended to help fuse the preservation and protection of historic resources into long-term land-use, economic, and social planning. Through the following broad goals, it provides continuity and guides the actions of City Departments and commissions in preserving and protecting South Pasadena's historic landmarks, neighborhoods, and properties on the historic inventory.

- Preserve and maintain sites, structures, and neighborhoods that serve as significant reminders of the City's social, educational, religious, and architecture history.
- Encourage maintenance and preservation of historic structures and artifacts.
- Maintain elements of the natural landscape that contribute to the attractiveness and the historic character of districts, neighborhoods, and landmarks.
- Assure continuity of the City's historic character, scale, and small-town atmosphere for all future projects.
- Build public awareness of preservation issues and appreciation for the unique history of South Pasadena and its neighborhoods.
- Adopt incentives that promote the preservation and rehabilitation of historic structures.
- Encourage public/private cooperation in preservation efforts that enhance property values, enrich the local economy and promote tourism.
- Integrate preservation into the planning process.

Mission Street Specific Plan

South Pasadena’s first Specific Plan, the Mission Street Specific Plan, was adopted on April 4, 1996.¹² The purposed of the Mission Street Specific Plan was to take advantage of the Metro station and to enhance the presence of Mission Street as a “pedestrian-oriented, historic shopping street.”¹³

The Mission Street Specific Plan includes a Historic Resources and Architectural Character section which describes the visual characteristics of the historic resources in the area. The majority of the non-residential Historic Resources (82 percent) are storefront commercial buildings, constructed of brick and other masonry materials. These storefront buildings are located primarily along Mission Street and are concentrated in the same locations that the retail/service uses are concentrated. There are only two historic storefronts that are not located along Mission Street (the former South Pasadena Banks building on the southwest corner of El Centro Street and Meridian Avenue and the Meridian Ironworks building on Meridian Avenue).

Most of the storefront buildings are Vernacular Commercial in style; they are simple buildings with minimal ornamentation. In addition, in the Core Area there are three Renaissance Revival Influence storefronts (the Alexander and Graham Blocks on the south side of Mission Street just east of Meridian Avenue and the South Pasadena Bank building) and one Streamline/Regency (Day Ray). The Adjacent Area to the east contains two Renaissance Revival Influence storefronts, one Spanish Colonial Revival, and one Post-War Modern, as well as one “black wall” Spanish Colonial Revival building (the Pacific Bell building) which could be converted to a storefront. There is one Spanish Colonial Revival and one Tudor Revival storefront building in the West Area.

Mission Street’s storefront buildings typically share the following characteristics:

- Front façades located within a few feet of the property line/sidewalk
- Solid masonry wall with individual windows set into the walls
- Vertical bays (storefronts) articulated by horizontal divisions
- Architectural detailing and ornamentation on the façade that faces the street
- Entries and display windows that re oriented to the sidewalk
- Brick or earth-tone or light walls.

¹² City of South Pasadena, *General Plan* (October 1998).

¹³ City of South Pasadena, *Mission Street Specific Plan* (April 1996).

City of South Pasadena Cultural Heritage Ordinance

In 1971, South Pasadena adopted Cultural Heritage Ordinance No. 1591 that established the City’s Cultural Heritage Commission to advise the City Council on all issues related to preservation. In 1992 the City adopted Ordinance No. 2004, the Historic Preservation Ordinance which defined the legal framework for preservation and clarified the role and functions of the Commission. In 1994 the City Council adopted the “South Pasadena Historic Resources Survey and Inventory of Addresses” which comprises the City’s Cultural Resources Inventory. The City adopted a new Historic Preservation Ordinance in 2017.

The Cultural Heritage Commission is responsible for adopting specific criteria and recommendations for the designation of landmarks and historic districts, subject to approval by the City Council. The following is a list of the six categories of landmark designation:

- Eligible for National Register of Historic Places – Districts, sites, buildings, structures, and objects of local, state and national significance in American history, architecture, archaeology, and culture that possesses integrity of location, design, setting, materials, workmanship, feeling, and association.
- Eligible for California Register of Historical Landmark Program – Sites and structures that contribute in a unique way to the history and heritage of the state. Several categories may determine landmark status, such as architectural, influential individuals, and other comparable categories.
- Eligible for California Point of Historical Interest Program – Program recognizes site sand structures of local countrywide importance.
- Locally Significant Resources – Structures, places, or historic sites that are individually significant to South Pasadena’s history and heritage
- Districts – Structures, groups of structures, historic sites or features, design components, natural features, and landscape architecture that contribute to the historic or community sense of place or are significant to an area’s historic feel. Normally, significant district structures must be located within the district boundaries; however, all structures in this area are not necessarily contributors to the district.
- Resources Eligible for the California Register of Cultural Resources – the register automatically includes all properties eligible for or listed in the National Register, California Registered Historic Landmarks from No. 770, and California Points of Historic Interest, and will include locally registered landmarks, inventories, and the new category of the California Register itself.

Existing Conditions

a. Regional and Local Setting

Located approximately 10 miles northeast of downtown Los Angeles, just east of the Arroyo Seco, and bounded by Raymond Hill to the north and the Monterey Hills to the southwest, South Pasadena sits on an alluvial plain that was cultivated with orange groves and grapevines in the late nineteenth century. In

1885, the Los Angeles and San Gabriel Valley Railroad constructed a passenger rail line between Pasadena and Los Angeles as well as a depot near the corner of Meridian Avenue and El Centro Street in South Pasadena. By 1887, the Santa Fe Railroad took control over the railroad company and its depot. The growth of the small community was aided by the establishment of the Raymond Hotel and the Cawston Ostrich Farm, which attracted visitors and new residents in the late nineteenth and early twentieth centuries. With the construction of the Pacific Electric Short Line from downtown Los Angeles to downtown Pasadena in 1902, South Pasadena became one of Los Angeles' first suburbs—a destination for those seeking a favorable climate, scenic views, and a more serene atmosphere than the hustle and bustle of its much larger neighbors of Pasadena and Los Angeles. South Pasadena has maintained this small-town suburban feel, with a population just over 25,000 and much of its land occupied by single-family residences.

South Pasadena has two main commercial thoroughfares today: Mission Street and Fair Oaks Avenue. The original commercial core developed adjacent to the Los Angeles and San Gabriel Valley Railroad depot at Mission and El Centro streets. Commercial buildings were constructed in the following years extending east along Mission Street. Commercial growth along Fair Oaks Avenue (for a time a part of historic Route 66) did not commence until the 1920s when the street was rezoned for commercial purposes. Larger commercial development replaced many of the smaller buildings along the street in the 1970s and 1980s. The City's development pattern generally conforms to the rectilinear street grid pattern established prior to the turn of the twentieth century. Later alterations to the street grid include the construction of Arroyo Seco Parkway (Pasadena Freeway/CA 110) in 1940, which runs east–west through the north end of the City.

The Project Site is in the Los Angeles Basin: a broad, level plain defined by the Pacific Ocean to the west; the Santa Monica Mountains and Puente Hills to the north; and the Santa Ana Mountains and San Joaquin Hills to the south. This extensive alluvial wash basin is filled with Quaternary alluvial sediments. It is drained by several major watercourses, including the Los Angeles, Rio Hondo, San Gabriel, and Santa Ana Rivers. The Project Site is within an urbanized setting at an elevation of approximately 68 feet above mean sea level. The Project Site is located approximately 0.81 miles east of the Port of Arroyo Seco and 6.08 miles south of the Angeles National Forest.

b. Cultural Setting

Prehistoric Background

Numerous chronological sequences have been devised to aid in understanding cultural changes in Southern California. The four principal prehistoric periods for the Southern California coastal region are

the Early Man, Milling Stone, Intermediate, and Late Prehistoric periods.¹⁴ A summary of each of these prehistoric chronological sequences for southern California is described below.

Early Human (10,000–6,000 BCE)

The earliest accepted dates for archaeological sites on the Southern California coast are from two of the northern Channel Islands, located off the coast of Santa Barbara. On San Miguel Island, Daisy Cave clearly establishes the presence of people in this area about 10,000 years ago. On Santa Rosa Island, human remains have been dated from the Arlington Springs site to approximately 13,000 years ago. Present-day Orange and San Diego Counties contain several sites dating from to 9,000 to 10,000 years ago. Although the dating of these finds remains controversial, several sets of human remains from the Los Angeles Basin (e.g., Los Angeles Man, La Brea Woman, and the Haverty skeletons) apparently date to the middle Holocene, if not earlier.

Recent data from Horizon I sites indicate that the economy was a diverse mixture of hunting and gathering, with a major emphasis on aquatic resources in many coastal areas and a greater emphasis on large-game hunting inland.

Milling Stone (6,000–3,000 BCE)

Set during a drier climatic regime than the previous horizon, the Milling Stone Horizon period is characterized by subsistence strategies centered on collecting plant foods and small animals. The importance of seed processing is apparent in the dominance of stone-grinding implements in contemporary archaeological assemblages, namely milling stones (metates) and handstones (manos). Recent research indicates that Milling Stone Horizon food-procurement strategies varied in both time and space, reflecting divergent responses to variable coastal and inland environmental conditions.

In the Ballona Wetlands area, the Milling Stone period represented the beginning of many changes in the settlement of the area. The influx of Takic-speaking peoples into the Los Angeles Basin resulted in an increase of sites, new subsistence strategies, and new mortuary practices.

Intermediate (3,000 BCE–500 CE)

The Intermediate Horizon period is characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods. An increasing variety and abundance of fish, land mammal, and sea mammal remains are found in sites from this period along the California coast. Related chipped-stone tools suitable for hunting are more abundant and diversified, and shell fishhooks became part of

14 William J. Wallace, "A Suggested Chronology for Southern California Coastal Archaeology," in *Southwestern Journal of Anthropology* 11 no. 3 (1955): 214–230.

the toolkit during this period. Mortars and pestles also became more common during this period, gradually replacing manos and metates as the dominant milling equipment, signaling a shift away from the processing and consuming of hard seed resources to the increasing importance of the acorn.

In the Ballona area, the intermediate period saw the continued growth of population; all major sites were occupied. This period also corresponds with the highest amount of precipitation in thousands of years, increasing the productivity of the wetlands and allowing for a higher population to be supported.

Late Prehistoric (500 CE–Historic Contact)

In the Late Prehistoric Horizon, there was an increase in the use of plant food resources, in addition to an increase in land and sea mammal hunting. There was a concomitant increase in the diversity and complexity of material culture during the Late Prehistoric, demonstrated by more classes of artifacts. The recovery of a greater number of small, finely-chipped projectile points suggests increased use of the bow and arrow rather than the atlatl (spear thrower) and dart for hunting. Steatite cooking vessels and containers are also present in sites from this time. In addition, there is an increased presence of smaller bone and shell circular fishhooks; perforated stones; arrow-shaft straighteners made of steatite; a variety of bone tools; and personal ornaments, such as beads made from shell, bone, and stone. There was also an increased use of asphalt for waterproofing and as an adhesive.

By 1,000 CE, fired-clay smoking pipes and ceramic vessels were being used at some sites. The scarcity of pottery in coastal and near-coastal sites implies that ceramic technology was not well developed in that area, or that ceramics were obtained by trade with neighboring groups to the south and east. The lack of widespread pottery manufacture is usually attributed to the high quality of tightly woven and watertight basketry that functioned in the same capacity as ceramic vessels.

During this period, there was an increase in population size accompanied by the advent of larger, more permanent villages. Large populations and, in places, high population densities are characteristic, with some coastal and near-coastal settlements containing as many as 1,500 people. Many of the larger settlements were permanent villages in which people resided year-round. The populations of these villages may have also increased seasonally.

In anthropologist Claude Warren's cultural ecological scheme,¹⁵ the period between AD 500 and European contact is divided into three regional patterns: Chumash (Santa Barbara and Ventura Counties), Tatic/Numic (Los Angeles, Orange, and western Riverside Counties), and Yuman (San Diego County). The

15 Claude N. Warren, "Cultural Tradition and Ecological Adaptation on the Southern California Coast," in *Archaic Prehistory in the Western United States*, Contributions in Anthropology No. 1(3), edited by Cynthia Irwin-Williams (Portales, NM: Eastern New Mexico University, 1968).

seemingly abrupt introduction of cremation, pottery, and small, triangular arrow points in parts of modern-day Los Angeles, Orange, and western Riverside Counties at the beginning of the Late Prehistoric period is thought to be the result of a Takic migration to the coast from inland desert regions. Modern Gabrielino/Tongva, Juaneño, and Luiseño people in this region are considered to be the descendants of the Uto-Aztecan, Takic-speaking populations that settled along the California coast during this period.¹⁶

Ethnographic Background

The Project Site is in the heart of territory for the Gabrielino/Tongva native groups. Surrounding native groups include the Chumash and Tatataviam/Alliklik to the north, the Serrano to the east, and the Luiseño/Juaneño to the south. There is well-documented interaction between the Gabrielino and many of their neighbors in the form of intermarriage and trade.

The Gabrielino/Tongva lands encompassed the greater Los Angeles Basin and three Channel Islands—San Clemente, San Nicolas, and Santa Catalina. Their mainland territory was bounded on the north by the Chumash at Topanga Creek; the Serrano at the San Gabriel Mountains in the east; and the Juaneño on the south at Aliso Creek.

The Gabrielino/Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast, stretching from the foothills of the San Gabriel Mountains to the Pacific Ocean. A total tribal population has been estimated of at least 5,000, but recent ethnohistoric work suggests that a number approaching 10,000 seems more likely. Several Gabrielino/Tongva villages appear to have served as trade centers due in large part to their centralized geographic position in relation to the southern Channel Islands and to other tribes. These villages maintained particularly large populations and hosted annual trade fairs that would bring their population to 1,000 or more for the duration of the event.

Historical Background

Like much of the Los Angeles County, South Pasadena was originally inhabited by a branch of the Tongva Nation (in this case, the Hahamongna tribe). For centuries, the Hahamongna thrived on land now part of Altadena, Pasadena, and South Pasadena, largely due to its proximity to the Arroyo Seco, which provided access to travel and commerce for native peoples in Southern California. In 1771, Mission San Gabriel Arcángel was founded just southeast of present-day South Pasadena, and the natives inhabiting this area became known as Gabrieliños. When the Spanish began occupying the San Gabriel Valley, the Gabrieliños

16 SWCA Environmental Consultants, *Archeological Assessment for the Compton High School Reconstruction Project* (January 2018).

were forced to live on Mission land. In 1834, Spain secularized the missions, while at the same time, Mexico won independence and California became a Mexican province.

South Pasadena occupies a small portion of the lands that were a part of Mission San Gabriel. After the secularization of Mission lands by the Mexican government, the land on which South Pasadena would later develop was given in an 1835 land grant by the government of Mexico to Juan Marine and Eulaia Pérez de Guillen and named Rancho San Pasqual. Portions of the rancho were sold.

In 1873, Indiana native Daniel Berry moved to Los Angeles with the intention of establishing the California Colony of Indiana, which came to prosper with the cultivation of citrus trees and grapevines. In November of 1873, Berry organized a group of fellow Indianans as well as new associates he had met in California to create the San Gabriel Orange Grove Association. The newly-formed association acquired a large tract of Rancho San Pasqual and subdivided it among its members. Known as the Indiana Colony up until that point, the investors selected the name Pasadena in 1875; residents located in the southern section of the settlement were known as South Pasadenans, but there was no political division at the time.

South Pasadenans petitioned for their own school and later, in 1882, a dedicated post office, both located on Columbia Street. Jane Apostol, in her definitive history book on South Pasadena, notes that Pasadena began working toward incorporation in 1884, but there was less interest in such political recognition in the southern regions, where a desire to avoid “outside interference” prevailed. Pasadena was incorporated in 1886, with Columbia Street as the southern boundary.

Throughout the 20th century, business and industry declined. Several ideas were proposed for the revitalization of the downtown commercial core. In 1989, the South Pasadena City Council created the Downtown Revitalization Task Force (later known as the General Plan Advisory Committee). In 1996, the Mission Street Specific Plan was adopted to aid in the revitalization of the city’s old commercial core. The plan proved to be successful, and today, businesses are thriving along Mission Street with a number of new restaurants, retail stores and office occupying some of the city’s oldest commercial buildings.

c. Historical Resources

Project Site

The Project site is currently occupied by three buildings. The buildings at 1101 and 1107 Mission Street were constructed in the late 1970s, have not been identified in any historic surveys and therefore do not qualify as historic resources. These two structures would be demolished as part of the Project. The structure at 1115 Mission Street was constructed in 1921 and is listed in the City's Historic Resource Inventory. As such, this section shall focus on the structure at 1115 Mission Street.

Known as the Luttrell's Building, 1115 Mission Street was identified as a "Vernacular commercial building" by the 1996 Mission Street Specific Plan. The original owner was James H. McCluer. According to the South Pasadena and San Marino City Directory (1926, 1928, 1929), he was an employee at the Water Department (1926) and lived with his wife Kate at 1117 Mission Street, immediately east of the Subject Property. A business building announcement was published in *Southwest Building and Contractor* for a "brick building at 1115 Mission St." in March 25, 1921. The building was repaired in 1933 and plastered for a three-room apartment. Another remodel in 1978 reported by the County Assessor raised the effective age to 1943.¹⁷

According to an advertisement in the *San Bernardino Sun* (March 25, 1925), the headquarters for a nationally known bottled beverage, the Whistle Bottling Company, operated from 1115 Mission Street in 1925. A 1927 photograph from the Huntington Library shows the Whistle Bottling Company store with a different storefront than what is seen today. The storefront featured a large projecting window with marble bulkhead, plate glass window, and wood entrance ceiling. Another 1925 photograph showed a large plate glass window with one mullion down the middle. The walls appeared to be unglazed brick and concrete. In 1926, the city directory listed A.E. Myers as president of the Whistle Bottling Company. In 1928-9, J.R. Irvine was the President. By 1932, the Whistle Bottling Company was not mentioned in the city directory. Building permits show that E.M. and A.E. Turner were the owners of the property in 1954. In 1960, A.E. Turner started Superior Shirt Laundry at the Subject Property and the business was operated at the building from 1960 to at least 1971. In 1965, the city directory listed Superior Shirt Landry and Edwin B. Strong under the address. In 1974, Thomas A. Urton was the owner. In 1982, the owner was Luttrell's Upholstery. In 1992, the owner was Andrew Cherng.

1115 Mission Street is a two-story commercial building with residential use above, commercial use on the ground floor, and a one-story warehouse attached to the rear. The front (north) facade of the building faces Mission Street at the property line and features white-enameled brick in a running bond, an off-

¹⁷ Los Angeles County Assessor, Record for 1115 Mission Street, 1934-1978.

center entrance and storefront-style window. The upper level features two symmetrical windows and a projecting brick frieze. The front windows are non-original replacements. Although the building's storefront is substantially altered and the brick on the side elevations is in poor condition, the buildings footprint, massing, enabled brick masonry primary (front) elevation, parapet, segmental arched openings on the east elevation, and wood-truss warehouse roof are characteristic components of the original style.

1115 Mission Street was included in a list of historic structures in the 1996 Mission Street Specific Plan, in a 2003 reconnaissance-level City-wide historic survey, and in the 2015/16 City of South Pasadena Historic Resources Survey. In the 2003 survey the property was identified as "Not Eligible for Local Listing" but "eligible for consideration in Local Planning." In the 2015/2016 survey it was also identified as "not eligible for local listing", but "may warrant special consideration in local planning." As such, the structure at 1115 Mission Street is not clearly a historic resource under CEQA, however the City has given the property special consideration in its planning efforts with its evaluation in this EIR.

South Pasadena Historic Business District

The South Pasadena Historic Business District (also known as the Mission West Historic Business District) comprises the City's commercial core that largely developed between 1887 and 1924. The district is generally bounded by Fairview Avenue to the east, Hope Street to the north, and El Centro Street to the south (except where the boundary extends south to Oxley Street to include the South Pasadena Public Library). Its westerly boundary jogs to include four structures directly west of Meridian Avenue: the former Mission Arroyo Hotel at 950-966 Mission Street, Meridian Iron Works at 913 Meridian Avenue, a watering trough and wayside station along Meridian Parkway, and a lot originally part of the Santa Fe Railroad right-of-way (now occupied by a 1980s building). The historic district encompasses 18 properties, of which 14 are contributors to the district. These include several commercial buildings located along Mission Street the former South Pasadena Bank at the southwest corner of El Centro Street and Diamond Avenue, and diverse resources including Meridian Iron Works (originally a hotel and market, now occupied by the South Pasadena Historical Museum), a watering trough and wayside station, the School District Administration Building (formerly El Centro School; includes the auditorium addition which is now the South Pasadena School District Boardroom), and the South Pasadena Public Library.

Three additional buildings within the district boundaries were constructed after the National Register of Historic Places listing: two commercial buildings—919 Mission Street (1986) and 1020 Mission Street (1997) —and a multifamily apartment building at 1000 El Centro Street (built in 1988). The commercial buildings were constructed on sites that were vacant or used as parking lots at the time of the nomination, and the apartment building replaced an electronic equipment manufacturing building (1949) that was a non-contributor to the district.

Description of District Contributors

One- and two-story commercial buildings from the early twentieth century comprise the majority of the historic resources within the district. All were constructed between 1887 and 1924 and built to the sidewalk line. The Alexander Block (1101–1005 Mission Street) and the Graham Block (1011– 1017 Mission Street), located between Meridian and Diamond, contain relatively earlier buildings that cover significantly more street frontage. The architectural character of the buildings is generally modest and vernacular in nature, though those that are better preserved are very good examples of the early twentieth century commercial vernacular of small Southern California towns. The district's significance has been well sustained in the 35 years since its listing in the NRHP, with no demolition or major alteration of contributors. It must be noted, however, that approximately one-third of the buildings within the historic district exhibit fairly significant alterations which, in most cases, occurred prior to the district's listing. Typical alterations include non-historic stucco cladding and stone cladding (circa the 1950s) on the main façades of commercial properties as well as altered and replaced storefronts.

The historic district also contains two institutional buildings. El Centro School, now the SPUSD Administration Building, which is adjacent to the project footprint (1928; north addition 1931, auditorium, now the SPUSD Boardroom) was designed in the Romanesque Revival style. The South Pasadena Public Library (originally built in 1907) reflects its appearance as of 1930, when it was moved to the center of the lot, enlarged, and remodeled in the Mediterranean Revival style. The former school was altered after the period of significance, in 1949. For seismic safety reasons, the central bell tower, a major feature of the building, was removed and a significant amount of exterior brick veneer was covered with stucco or removed. The east and west corridors or colonnades were altered, apparently during the same seismic upgrade, and a few of the bays that originally retained operable rectangular panels were filled in. Since the building has been used for offices since 1977, its interior no longer reflects the character or features of the original classrooms. While it is not considered an individually eligible resource, as discussed below, the building retains enough of its original design to contribute to the historic district.

The South Pasadena Public Library was also altered in 1982 with a large addition on its south side, facing away from and generally not visible from the rest of the district. This alteration did not affect the eligibility of the historic district or compromise the building's eligibility for local listing or as a contributor to the historic district.

Several of the commercial buildings in the district have compromised historic integrity of design and materials (resulting in compromised historic feeling). Most of these alterations had already taken place when the NRHP listing occurred. Therefore, these properties were not reevaluated.

ENVIRONMENTAL IMPACTS

Methodology

The evaluation of potential impacts is based on the *Historical Resources Assessment and CEQA Impacts Analysis for CFT Mission Bell Center Mixed Use Project* (Historical Report), dated July 13, 2017, by Environmental Science Associates (ESA) provided as **Appendix C** to this Draft EIR and on the review and evaluation of the Project by City staff and City retained consultants. Under CEQA, a historic impact occurs if there is a substantial change to the resource such that its significance would be impaired.

Thresholds of Significance

The proposed Project may be deemed to have a significant impact related to cultural resources if it would:

Threshold CUL-1: Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5

Threshold CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5

Threshold CUL-3: Disturb any human remains, including those interred outside of formal cemeteries

Project Impact Analysis

Threshold CUL-1: Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5

Less than Significant Impact. The Project would demolish two-thirds of the warehouse portion of the property 1115 Mission Street and retain the two-story commercial and residential portion and one-third of the warehouse portion of the building. The Project would rehabilitate the portion of the building fronting Mission Street for adaptive reuse as a two-story commercial and residential building and construct a new two-story residential building attached to the rear of the retained portion of 1115 Mission Street. The Project would also demolish the two existing buildings located at 1101 and 1107 Mission Street and construct a new three story commercial and residential building on the site.

Significance Evaluation of the Building

1115 Mission Street is a two-story commercial and residential structure built in 1921 that has been included in a list of historic structures in the 1996 Mission Street Specific Plan, a 2003 reconnaissance-level City-wide historic survey, and the 2015/16 City of South Pasadena Historic Resources Survey. In the 2003 survey the property was identified as "Not Eligible for Local Listing" but "eligible for consideration

in Local Planning." In the 2015/2016 survey it was also identified as "not eligible for local listing, but as, the property warrants special consideration in local planning." As such, the structure at 1115 Mission Street is not clearly a historic resource under CEQA, however, the City has given the property special consideration in its planning efforts with its evaluation in this EIR.

1115 Mission Street was identified as a "Vernacular commercial building" in the 1996 Mission Street Specific Plan. A 1927 photograph from the Huntington Library shows the building as the Whistle Bottling Company store with a different storefront than what is seen today. The storefront featured a large projecting window with marble bulkhead, plate glass window, and wood entrance ceiling. Another 1927 photograph showed a large plate glass window with one mullion down the middle. The walls appeared to be unglazed brick and concrete.

The overall primary features include the rectangular-shaped footprint; massing; flat roof; brick material; and commercial facade. Key features of the commercial façade include the glazed brick surface, storefront windows, the single door opening, decorative brick course between the first and second stories, recessed sign area, the cornice, frieze, and angled sills. The features of the original 1921 design shown in historic photographs of the storefront are different than what is seen today. However, building permits do not show what alterations were done on the storefront.

Direct Impacts

The proposed Project changes affect the appearance of the building facade and the footprint and massing of the building. The primary façade adjacent to Mission Street will have the non-original first and second-story windows replaced with period-appropriate style windows. Three windows will be added to the first story of the west façade. A solid door, replacing a window, will be added to the east façade. The south façade would be altered with the removal of the existing shed structure and the construction of the new residential building.

The National Park Service defines rehabilitation as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values."¹⁸ As part of the effort to give special consideration to the planning effort of the Project the design would make possible a compatible use of the property with alterations that preserve those portions of the property that convey its historic and architectural value. Under CEQA, a project that follows *the Secretary of the Interior's Standards* ("the

18 *The Secretary Of The Interior's Standards For The Treatment Of Historic Properties, 1995 With Guidelines For Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, Introduction

Standards”) shall be considered as mitigated to a level of less than significant impact on the Historical Resource.¹⁹ Special consideration in the planning effort for the Project has been taken to evaluate the Project per the Standards. As shown in **Table 4.2-1**, the Project is generally consistent with the Standards. As such, direct impacts would be less than significant.

**Table 4.2-1
Consistency with Secretary of the Interior Standards**

Standard	Project Consistency
Standard 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.	Consistent. The property would be redeveloped as a commercial and residential use and would retain the commercial façade along Mission Street.
Standard 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.	Consistent. Although the property is not eligible for designation as a local landmark or inclusion in a historic district, the Project proposes to retain some of the building’s original features. These features include: the enameled brick of the main façade; the decorative brick course between the first and second stories; recessed sign area; the cornice; frieze; and angled window sills. The distinctive materials and features of the store front would be retained. A new structure would be attached at the rear which would be architecturally consistent with the character of the retained front of the building.
Standard 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.	Consistent. The overall design does not create a false sense of historical development and does not incorporate conjectural features from other historic properties into the development.
Standard 4: Changes to a property that have acquired historic significance in their own right will be retained and preserved.	Consistent. There have been no changes to the subject property that have acquired historic significance in their own right.
Standard 5: Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.	Consistent. Although the property is not eligible for designation as a local landmark or inclusion in a historic district, the Project proposes to retain some of the building’s original features such as the enameled brick of the main façade, the decorative brick course between the first and second stories, the recessed sign area, the cornice, frieze, and angled window sills.
Standard 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,	Consistent. The first and second-story windows are not original to the building and are deteriorated beyond repair. These windows will be replaced with period-appropriate style windows.

¹⁹ California Environmental Quality Act, 15064.5(3)

Standard	Project Consistency
materials. Replacement of missing features will be substantiated by documentary and physical evidence.	
Standard 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.	Consistent. No chemical or physical treatments are proposed.
Standard 8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.	Consistent. No archeological resources are known to exist on the site.
Standard 9: New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property, the new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.	Consistent. The proposed new construction would be differentiated from the existing portion of the building fronting Mission Street. The new building to be attached at the rear will be a two story residential building designed at a scale and mass similar to the existing being retained and renovated.
Standard 10: New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.	Consistent. The Project would remove the single story warehouse from the rear façade and a new two story residential structure would be constructed in its place. The new construction, if removed at some later time, would not impair the essential form and integrity of the retained portion of the building fronting Mission Street.

Indirect Impacts

The surrounding area includes numerous historic resources. Construction and operation of the Project would not alter any of the physical characteristics of nearby historic resources. Additionally, construction and operation of the Project would not alter the historic context of the South Pasadena Historic District and other commercial areas fronting Mission Street. Though the new component of the Project would be two and three-stories in height and the historic resources of the South Pasadena Historic Business District (District) are predominantly two-story in height, the design of the new construction features upper level setbacks and building volumes defined by differing material and color finishes. As such, the massing of the new construction would be compatible with the development pattern of the surrounding area. Therefore, the Project would not adversely alter the character or feeling associated with the District or other commercial areas fronting Mission Street, and the historical significance and eligibility of existing resources would not be impaired. Therefore, indirect impacts would be less than significant.

Threshold CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5

The proposed Project area has been heavily disturbed by past development and related construction activities. However, the potential exists for unknown archaeological resources to be inadvertently unearthed during earthmoving activities associated with the demolition of the existing residential buildings on the site. The demolition of these buildings would facilitate the future development of commercial and multifamily mixed-use buildings. During any future construction, if subsurface artifacts are unearthed, the Applicant is required to comply with California Public Resources Code (PRC) Section 21083.2, which specifies the protocol to be followed should cultural resources be discovered during excavation, grading, or construction activities. Should that process determine that any artifacts found are tribal in origin, ground-disturbance activity shall cease, and the City shall notify the tribes known to be affiliated with the Project area to initiate development of a tribal cultural resource (TCR) monitoring plan. With compliance with these procedures, impacts would be less than significant.

Threshold CUL-3: Disturb any human remains, including those interred outside of formal cemeteries

A significant impact would occur if previously interred human remains would be disturbed during excavation of the Project Site. The Project Site is in an urbanized area and has been subject to grading and development in the past.

While no formal cemeteries, other places of human internment, or burial grounds or sites are known to occur within the Project area, there is always a possibility that human remains can be encountered during ground-disturbing activities. Construction of the proposed Project would adhere to California Health and Safety Code Section 7050.5, which states that if human remains are encountered, no further disturbance shall occur until the Los Angeles County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The Los Angeles County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. With adherence to these regulatory requirements, impacts would be less than significant.

CUMULATIVE IMPACTS

The analysis of cumulative impacts to historic resources is based on whether impacts of the proposed Project and related projects, when taken as a whole, substantially diminish the number of historic resources within the same or similar context or property type. As discussed previously, the proposed Project would not significantly impact any historic resources. Thus, the proposed Project would not contribute to cumulative impacts to historic resources and would result in a less than significant impact.

The proposed Project, in combination with cumulative development, could contribute to the disturbance of land, which could potentially contain archaeological and paleontological resources. Determinations regarding the significance of impacts of the related projects on archaeological and paleontological resources would be made on a case-by-case basis and, if necessary, the applicants of the related projects would be required to adhere to applicable with federal, State, and local requires and/or implement appropriate mitigation measures. The proposed Project's potential impacts to archaeological and paleontological resources would be less than significant with adherence to regulatory requirements and implementation of the recommended mitigation measures. Therefore, the proposed Project would not contribute to any potential cumulative impacts on archaeological and paleontological resources. Impacts would not be cumulatively considerable.

MITIGATION MEASURES

All Project impacts related to Cultural Resources were found to be less than significant. No mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

As discussed above all Project impacts to Cultural Resources were found to be less than significant.