

3.2 CULTURAL RESOURCES

3.2 CULTURAL RESOURCES

This section considers and evaluates the proposed project's potential impacts on cultural and paleontological resources. Cultural resources include historic buildings and structures, historic districts, historic resource sites, prehistoric and historic archaeological sites, and other prehistoric and historic objects and artifacts. Paleontological resources include vertebrate, invertebrate, and plant fossils.

The following definitions are common terms used to discuss the regulatory requirements and treatment of cultural resources:

- *Cultural resources* is the term used to describe several different types of properties: prehistoric and historical archaeological sites; architectural properties such as buildings, bridges, and infrastructure; and resources of importance to Native Americans.
- *Historic properties* is a term defined by the National Historic Preservation Act as any prehistoric or historic district, site, building, structure, or object included on, or eligible for inclusion on, the National Register of Historic Places (NRHP), including artifacts, records, and material remains related to such property.
- *Historical resource* is a California Environmental Quality Act (CEQA) term that includes buildings, sites, structures, objects, or districts, each of which may have historical, prehistoric, architectural, archaeological, cultural, or scientific importance and is eligible for listing or is listed in the California Register of Historical Resources (CRHR).
- *Paleontological resource* is defined as including fossilized remains of vertebrate and invertebrate organisms, fossil tracks and trackways, and plant fossils. A unique paleontological site would include a known area of fossil-bearing rock strata.

A summary of the impact conclusions for cultural and paleontological resources is provided below. As discussed in the project's Initial Study (**Appendix A**) and in Section 3.0, subsection 3.3, Impacts Found to Be Less Than Significant, of this Draft EIR, the project would have no impact related to Impact 3.2.4; therefore, it will not be discussed further in this Draft EIR.

Impact Number	Impact Topic	Impact Significance
3.2.1	Disturb historic resources	Less than significant with mitigation
3.2.2	Disturb archaeological resources	Less than significant with mitigation
3.2.3	Disturb paleontological resources	Less than significant with mitigation
3.2.4	Disturb unknown human remains	Less than significant
3.2.5	Cumulative impacts on historic, cultural, and paleontological resources and human remains	Not cumulatively considerable

3.2.1 EXISTING SETTING

A report on the project area's historical significance was compiled by Architectural Resources Group, Inc. All of the information included in this section is based on the report and the primary sources cited within it. The report is attached as **Appendix D**.

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PROJECT AREA

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.

HISTORIC CONTEXT

Like much of 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 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. Rancho San Pasqual was established, comprising land now part of Altadena, Pasadena, and South Pasadena. The Rancho San Pasqual Mexican land grant was first given to Juan Mariné in 1835. Soon after, the rancho was further divided, and the oldest house in South Pasadena, El Adobe Flores, was constructed on the south slope of Raymond Hill.

In 1873, Indiana native Daniel Berry moved to Los Angeles with the intention of establishing the California Colony of Indiana, which would prosper as a cultivator 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 in order to create the San Gabriel Orange Grove Association. The newly formed association acquired a large tract of Rancho San Pasqual and subdivided it between members. As the community grew, the need for a formal name for their settlement became

apparent. In April 1875, stockholders of the San Gabriel Orange Grove Association voted, and the settlement was named Pasadena. Residents located in the southern section of the settlement began calling themselves South Pasadenans.

The Los Angeles and San Gabriel Valley Railroad first began service to South Pasadena on September 16, 1885, served by a depot located at Meridian Avenue and El Centro Street. The small town's favorable climate, scenic views, and now easy access from downtown lured visitors and prospective residents alike. In 1883, businessman Walter Raymond visited Pasadena. Taken aback by the beauty and serenity the region had to offer, he seized the opportunity to create the San Gabriel Valley's first luxury hotel. The Raymond Hotel opened atop a hill overlooking the town of South Pasadena in 1886. The hotel attracted travelers from across the country, seeking refuge from the harsh winter months back east. The year 1887 marked a major leap in South Pasadena's commercial development. Real estate offices, a meat market, a barber shop, and a blacksmith shop opened. By 1888, the Center Street schoolhouse, a Methodist church, and the Graham & Mohr Opera House Building (which housed a public library and meeting hall) had been erected along Center Street (now El Centro Street). The Meridian Iron Works building, originally occupied by a small hotel and grocery, was constructed at 913 Meridian Avenue. On March 2, 1888, South Pasadena officially incorporated, and the city's boundaries were established a year later. South Pasadena became the sixth municipality in Los Angeles County, and 500 residents occupied the newly incorporated city. In 1896, entrepreneur Edward Cawston moved his ostrich farm from Norwalk, California, to South Pasadena. The Cawston Ostrich Farm opened along the Arroyo Seco, west of the Santa Fe Railroad tracks, providing South Pasadena with a world-famous tourist attraction.

In 1902, the Pacific Electric Short Line was constructed, connecting downtown Los Angeles to Pasadena. The Oneonta Park station was established along Fair Oaks Avenue in South Pasadena, providing easy access to the city for commuters who worked downtown.

With the construction of the Pacific Electric Short Line, commercial development in South Pasadena boomed. In 1904, South Pasadena's first bank was erected at 1019 El Centro Street. The city's commercial center developed predominantly along Mission Street, between Meridian Avenue and Fairview Avenue. Between 1906 and 1908, several commercial buildings were constructed. Alexander R. Graham constructed two adjacent buildings that still bear his name today: the Alexander Block at 1001–1005 Mission Street and the Graham Block at 1011–1017 Mission Street. Next to the Graham Block, the First National Bank and the South Pasadena Savings Bank opened in the building at 1019 Mission Street (905 Diamond Avenue). This smaller building was designed by the South Pasadena architectural firm of Marsh & Russell. The Taylor Block (1028–1032 Mission Street) opened across the street from the old El Centro School, also designed by Marsh & Russell. A public dance hall opened in the Herlihy Block (1024 Mission Street) in 1907.

In October 1909, South Pasadena businessmen congregated to form a Chamber of Commerce, with nurseryman Edward H. Rust serving as its first president. The city had grown to 5,000, a volunteer fire department had formed, and a Carnegie library (designed by Norman Foote Marsh) was constructed at the corner of Diamond Avenue and El Centro Street in 1907. By 1910, Mission Street was lined with several retail stores, a drugstore, a post office, a paint shop, and a bank. Directly west of the commercial center (west of the railroad tracks) was the South Pasadena Lumber Company. Small-scale commercial businesses, including groceries, barbershops, and tailors, as well as an orange drink factory, two gas stove manufacturers, and two auto accessory stations, continued to thrive through the 1920s. In 1923, the Mission Arroyo Hotel opened at 950–966 Mission Street with its first floor occupied by retail stores and offices. In 1928, the new El Centro School opened on the north side of El Centro Street, between Diamond

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and Fairview avenues (an earlier elementary school had been located on the same lot). Between 1920 and 1930, the city's population had almost doubled from 7,652 to 13,730.

By 1930, South Pasadena's commercial core had largely been developed. A furniture store, a hardware store, and several small-scale manufacturing businesses, including a stamp manufacturer, an automobile paint shop, and a furniture finishing company, were located in the city's commercial center. However, commercial prosperity came to a halt in 1929 and the beginning of the Great Depression.

Businesses failed, and the city witnessed a sharp decline in tourism. In 1931, the Raymond Hotel closed its doors, and in 1934, the massive resort hotel was demolished. Cawston's Ostrich Farm went bankrupt and was forced to close in 1933. The city struggled with a sharp rise in unemployment and sought help from the federal government. Federal relief agencies put jobless South Pasadenans to work on the construction of the flood control channel built in the Arroyo Seco. Federal aid also helped fund new buildings at the high school, a new post office at El Centro Street and Fremont Avenue, and improved sidewalks, storm drains, and sewers throughout the city. In 1936, the City Council approved the construction of Arroyo Seco Parkway through the north end of the city. Ground was broken in 1938, and the parkway officially opened on December 30, 1940.

With the commencement of World War II, many young men of South Pasadena left their hometown for military training. Nineteen light manufacturing plants opened in the city, including Day-Ray Products (an electrical equipment manufacturer for aircraft companies), Phillips Aviation (an airplane and tank parts manufacturer), and National Technical Laboratories and the Helipot Corporation (manufacturers of precision instruments for measurement and analysis). Perkins Oriental Books, a family-owned business that operated out of a house on Mission Street, produced thousands of Japanese dictionaries and pocket-sized textbooks used by the United States military in language training courses. Over 1,500 individuals, most of whom lived in South Pasadena, were employed by these companies. After World War II, most manufacturing companies left South Pasadena. Two exceptions were an electronics manufacturing company and a scientific instrument manufacturing company on Mission Street in the city's old commercial center. In 1946, Boller & Chivens, a manufacturer of high quality scientific instruments, began operating out of 1020–1026 Mission Street. By the early 1950s, the company had outgrown its space along Mission Street and moved to the former Helipot Corporation building at 916 Meridian Avenue. The manufacturing company continued to grow and expanded into the building at 915 Meridian Avenue. In 1965, Boller & Chivens was purchased by Perkin Elmer, and a fourth building was acquired. The company continued to operate out of buildings located at the four corners of Meridian Avenue and El Centro Street until the early 1980s when it moved to Costa Mesa.

With the exception of Boller & Chivens, most of the large manufacturing companies—including Beckman Instruments, Stanford Research Institute, and Microdot—had left South Pasadena by the mid-1960s. Most of these companies found it difficult to expand in a small city predominantly zoned for residential and small-scale commercial purposes. Retail business in the city's commercial center had declined significantly by the 1970s as well. Several ideas were proposed for the revitalization of the downtown commercial core, but all were abandoned.

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 offices occupying some of the city's oldest commercial buildings.

PROJECT SITE

The project site is located in South Pasadena on a paved parking lot adjacent to the South Pasadena Unified School District Administration Building. The project site is located in the South Pasadena Historic Business District.

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 western 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 SPUSD Boardroom), and the South Pasadena Public Library.

Three additional buildings within the district boundaries were constructed after the NRHP listing: two commercial buildings—919 Mission Street (1986) and 1020 Mission Street (1997)—and a multi-family 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.

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FIGURE 3.2-1
SITE MAP OF CONTRIBUTORS, NON-CONTRIBUTORS, AND INDIVIDUALLY ELIGIBLE BUILDINGS IN THE SOUTH PASADENA HISTORIC BUSINESS DISTRICT



Source: Architectural Resources Group 2015

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.

KNOWN CULTURAL RESOURCES IN THE PROJECT AREA

The City of South Pasadena maintains a Local History Collection. The collection contains historic photographs, South Pasadena newspapers and quarterly, local yearbooks, city records and directories, biographical files, home research, obituaries, city landmarks, and early library history.

Per the discussion above, the project site is located in the South Pasadena Historic Business District. The two existing buildings on the project site—the School District Administration Building (formerly El Centro School) and the auditorium addition, which is now the SPUSD Boardroom—are contributing resources to the historic district. In addition, there are individual historic resources near the project site, including the South Pasadena Public Library to the south, the South Pasadena Bank Building to the southwest, and the El Centro/Central Market to the north.

KNOWN PALEONTOLOGICAL RESOURCES IN THE PROJECT AREA

Due the nature of the project site as a previously disturbed and urbanized area, it is unlikely that paleontological resources are located within the project site.

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3.2.2 REGULATORY FRAMEWORK

FEDERAL

The National Register of Historic Places (NRHP) contains the official list of properties that were found to be eligible for listing on the NRHP. The NRHP is administered by the National Park Service, a branch of the US Department of the Interior. The criteria for determining NRHP eligibility are found in Title 36 Code of Federal Regulations (CFR) Part 60. For a property to be considered eligible, it must meet the National Register Criteria for Evaluation, which involves examining the property's age, integrity, and significance. Nominations for listing are submitted to the California Office of Historic Preservation and the process can take up to 90 days. Archaeological site evaluation assesses the potential of each site to meet one or more of the criteria for NRHP eligibility based on visual surface and subsurface evidence (if available) at each site's location, information gathered during the literature and records searches, and the researcher's knowledge of and familiarity with the historic or prehistoric context associated with each site.

The American Indian Religious Freedom Act, Title 42 United States Code Section 1996, protects Native American religious practices, ethnic heritage sites, and land uses.

STATE

Under CEQA, public agencies must consider the effects of their actions on both historical resources and unique archaeological resources. Pursuant to Public Resources Code Section 21084.1, a "project 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." Section 21083.2 requires agencies to determine whether proposed projects would have effects on unique archaeological resources.

Historical resource is a term with a defined statutory meaning (Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5[a], [b]). The term embraces any resource listed in or determined to be eligible for listing in the California Register of Historical Resources. The CRHR is administered through the California Office of Historic Preservation and includes resources listed in or formally determined eligible for listing in the NRHP, as well as some California State Landmarks and Points of Historical Interest.

Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts) or that have been identified in a local historical resources inventory may be eligible for listing in the CRHR and are presumed to be historical resources for purposes of CEQA unless a preponderance of evidence indicates otherwise (Public Resources Code Section 5024.1 and California Code of Regulations, Title 14, Section 4850). Unless a resource listed in a survey has been demolished, lost substantial integrity, or there is a preponderance of evidence indicating that it is otherwise not eligible for listing, a lead agency should consider the resource to be potentially eligible for the CRHR. Potential eligibility also rests on the integrity of the resource. Integrity is defined as the retention of the resource's physical identity that existed during its period of significance. Integrity is determined through considering the setting, design, workmanship, materials, location, feeling, and association of the resource.

In addition to assessing whether historical resources potentially impacted by a proposed project are listed or have been identified in a survey process (Public Resources Code Section 5024.1[g]), lead agencies have a responsibility to evaluate them against the CRHR criteria prior to making a finding as to a proposed project's impacts to historical resources (Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5[a][3]). Following CEQA Guidelines Section

15064.5(a) and (b), a historical resource is defined as any object, building, structure, site, area, place, record, or manuscript that:

- a) Is historically or archeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, or cultural annals of California; and
- b) Meets any of the following criteria:
 - 1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - 2) Is associated with the lives of persons important in our past;
 - 3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - 4) Has yielded, or may be likely to yield, information important in prehistory or history.

Archaeological resources may also qualify as historical resources, and Public Resources Code Section 5024 requires consultation with the Office of Historic Preservation when a project may impact historical resources located on State-owned land.

For historic structures, CEQA Guidelines Section 15064.5(b)(3) states, "Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource."

As noted above, CEQA also requires lead agencies to consider whether projects will impact unique archaeological resources as outlined in Public Resources Code Section 21083.2(g). Treatment options under Section 21083.2 include activities that preserve such resources in place in an undisturbed state. Other acceptable methods of mitigation under Section 21083.2 include excavation and curation or study in place without excavation and curation (if the study finds that the artifacts would not meet one or more of the criteria for defining a unique archaeological resource).

Advice on procedures to identify cultural resources, evaluate their importance, and estimate potential effects is given in several agency publications such as the series produced by the Governor's Office of Planning and Research (OPR). The technical advice series produced by the OPR strongly recommends that Native American concerns and the concerns of other interested persons and corporate entities, including but not limited to museums, historical commissions, associations, and societies, be solicited as part of the process of cultural resources inventory. In addition, California law protects Native American burials, skeletal remains, and associated grave goods regardless of their antiquity and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5(b) specifies protocol when human remains are discovered.

Paleontological resources are classified as nonrenewable scientific resources and, on state lands, are protected by state statute (Public Resources Code Chapter 1.7, Section 5097.5,

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Archeological, Paleontological, and Historical Sites). No state or local agencies have specific jurisdiction over paleontological resources. No state or local agency requires a paleontological collecting permit to allow the recovery of fossil remains discovered as a result of construction-related earth-moving on state or private land on a project site.

LOCAL

City of South Pasadena Heritage Preservation Guidelines

The treatment and management of historic resources in South Pasadena is addressed in the City's General Plan as well as in its Mission Street Specific Plan. 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. After the City Council contracted for a comprehensive historic resources survey in 1991, it adopted the South Pasadena Historic Resources Survey: Inventory of Addresses in 1994. The list comprises the cultural heritage inventory as defined in Section 2.73.A-11E of Ordinance No. 2004. 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:

- 1) 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.
- 2) 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.
- 3) Eligible for California Point of Historical Interest Program – Program recognizes sites and structures of local or countrywide importance.
- 4) Locally Significant Resources – Structures, places, or historic sites that are individually significant to South Pasadena's history and heritage.
- 5) 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.
- 6) Resources Eligible for the California Register of Cultural Resources – Register automatically includes all properties eligible for or listed in the National Register, California Registered Historic Landmarks from No. 770, California Points of Historical Interest, and will include locally registered landmarks, inventories, and the new category of the California Register itself.

3.2.3 IMPACTS AND MITIGATION MEASURES

Following Public Resources Code Sections 21083.2 and 21084.1, and CEQA Guidelines Section 15064.5 and Appendix G, cultural resource impacts are considered to be significant if project implementation would result in any of the following:

- 1) Cause a substantial adverse change in the significance of a historical resource as defined in Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5, respectively.
- 2) Cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5.
- 3) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.
- 4) Disturb any human remains, including those interred outside of formal cemeteries.

As discussed in the project's Initial Study (**Appendix A**) and in Section 3.0, subsection 3.3, Impacts Found to Be Less Than Significant, of this Draft EIR, the project would have no impact related to Impact 3.2.4; therefore, it will not be discussed further in this Draft EIR.

CEQA Guidelines Section 15064.5 defines *substantial adverse change* as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource is materially impaired.

CEQA Guidelines Section 15064.5(b)(2) defines *materially impaired* for purposes of the definition of substantial adverse change as follows:

The significance of an historical resource is materially impaired 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 evidence that the resource is not historically or culturally significant; or*
- (C) *Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.*

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METHODOLOGY

The following impact analysis is based on the report compiled by Architectural Resources Group (ARG) regarding the project area's historical significance (**Appendix D**). For the preparation of this report, ARG performed the following tasks for research, documentation, and analysis:

- Conducted multiple site visits to examine and photograph the buildings, landscapes, and site features within the designated historic district and other properties adjoining the project site.
- Reviewed existing published literature on the history of South Pasadena, which includes several volumes written to commemorate the city's centennial.
- Conducted archival research relating to the property and its surroundings at the South Pasadena Public Library.
- Reviewed the California Historical Resources Inventory System (CHRIS), which includes properties listed or determined eligible for listing in the National Register of Historic Places, listed or determined eligible for listing in the California Register of Historical Resources, California Registered Historical Landmarks, Points of Historical Interest, and properties that have been evaluated in historical resources surveys, environmental analyses and other planning activities.
- Reviewed pertinent project documents for the proposed Mission Place project, including site plans, elevations, sections, and perspective renderings.

All research and analysis was completed by ARG architectural historians and historic preservation planners Jennifer Trotoux and Evanne St. Charles. Both meet the Secretary of the Interior's professional qualifications standards (36 CFR Part 61) for history and architectural history.

In accordance with CEQA, the analysis of impacts on historic resources focused on determining whether the project would result in a substantial adverse change in the significance of an historical resource. As described previously in subsection 3.2.2, Regulatory Framework, substantial adverse change is defined as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (CEQA Guidelines Section 15064.5[b][1]). Generally, the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that convey its historical significance and justify or account for its inclusion in, or eligibility for inclusion in the California Register or a local register of historical resources (CEQA Guidelines Section 15064.5[b][2]). CEQA Guidelines Section 15064.5(b)(3) provides further guidance that "Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimer, [standards] shall be considered as mitigated to a level of less than a significant impact on the historical resource." It is important to note that projects which do not conform to the standards do not necessarily result in significant impacts pursuant to CEQA. However, projects that conform to the standards are presumed to clearly not have a significant impact on historic resources pursuant to CEQA. As a conservative approach for this EIR, the analysis considered the project's consistency with the standards as guidance in determining the potential for the project to result in a significant impact on the South Pasadena Historic Business District.

The Secretary of the Interior's Standards were developed by the National Park Service and are referred to by federal, state, and local authorities as well as architects and other historic preservation professionals to guide the treatment of historic properties. The standards are not considered to be prescriptive or comprehensive. They are intended to be applied to a wide variety of resource types, including buildings, sites, structures, objects, and historic districts. Four treatment approaches are defined for historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The National Park Service advises that the approach most appropriate to the historic property and to the project should be identified by considering, among other factors, the relative importance of the historic resource, its physical condition, the proposed use, and whatever mandated code requirements may apply.

Although none of the buildings in the surrounding historic district are proposed for rehabilitation themselves, the treatment approach of rehabilitation in the Secretary of the Interior's Standards was utilized in this analysis as the most applicable for the evaluation of the proposed project. Rehabilitation as a treatment approach is defined as follows:

(T)he 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.

The Standards for Rehabilitation are employed to determine the impacts of new construction within historic districts. While some of the standards do not apply to the current project (as noted in the analysis below), other standards provide an effective measure of the issues that are typically of concern when new construction is introduced within a historic district.

The Secretary of the Interior's Standards for Rehabilitation are as follows:

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

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- 8) Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
- 9) New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
- 10) New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

PROJECT IMPACTS AND MITIGATION MEASURES

Disturb Historic Resources (Standard of Significance 1)

Impact 3.2.1 The proposed project site is located in the South Pasadena Historic Business District (also known as the Mission West Historic Business District), which is listed on the National Register of Historic Places. The project would place two new structures within the Historic Business District adjacent to contributing historic resources. The resulting impact on historic resources would be **less than significant with mitigation incorporated**.

The area proposed for development is a paved parking lot adjacent to the South Pasadena Unified School Administration Building. The project site is adjacent to several historic resources and lies within the South Pasadena Historic Business District (also known as the Mission West Historic Business District), which is listed on the National Register of Historic Places. The two existing buildings on the project site—the School District Administration Building (formerly El Centro School) and the auditorium addition, which is now the SPUSD Boardroom—are contributing resources to the historic district. In addition, there are individual historic resources near the project site, including the South Pasadena Public Library to the south, the South Pasadena Bank Building to the southwest, and the El Centro/Central Market to the north. See **Table 3.2-1** for an expanded list of historic resources in the area. The proposed project would add two mixed-use buildings in the historic business district and has the potential to affect the setting and context of historic resources in the project vicinity.

**TABLE 3.2-1
HISTORIC RESOURCES IN THE PROJECT AREA**

Resource Name	Address	HRI Status Code	Resource Type
South Pasadena Historic Business District	950–966 Mission St.	1S	Historic District listed in the National Register
Mission Arroyo Hotel		1D*	District Contributor
Alexander Block	1001–1005 Mission St.	1D	District Contributor
Graham Block	1011–1017 Mission St.	1D	District Contributor
South Pasadena First	1019 Mission St.	1D	District Contributor
National Bank	905 Diamond Ave.		
Shapiro Block	1002–1006 Mission St.	1D	District Contributor
Edwards & Faw Block	1008–1010 Mission St.	1D	District Contributor
Ashton Block	1012 Mission St.	1D	District Contributor
Commercial Bldg.	1014 Mission St.	1D	District Contributor
Taylor Block	1028–1032 Mission St.	1D	District Contributor
South Pasadena Bank	1019 El Centro St.	1D*	District Contributor
El Centro School District Administration Bldg.	1020 El Centro St.	1D	District Contributor
South Pasadena Public Library	1115 El Centro St.	1D*	District Contributor
Meridian Iron Works	913 Meridian Ave.	1D*	District Contributor
Watering Trough and Wayside Station	Meridian Ave. parkway	1D*	District Contributor
El Centro Market/Central Market	1040 Mission St.	2S (4/13/01) Determined individually eligible by the Keeper; not listed due to owner objection	Individually listed in the California Register

Source: Architectural Resources Group

Shaded properties above are contributors to the historic district.

*An asterisk following the status code indicates historic district contributors that are also individually listed as local landmarks.

No additional resources were found that would be potentially impacted by the project. The historic district surrounds the project on three sides. To the east of Fairview Avenue, the buildings adjacent to the project site were not evaluated because they are not yet of an age to be considered for their value as historic resources. They include a townhouse development, an office building on the northeast corner of Fairview and El Centro, and an industrial/commercial building at the southeast corner of Fairview Avenue and Mission Street. These properties do not appear to have any association with significant events, patterns of events, or persons or any architectural significance that could merit a finding of exceptional significance despite their age.

The following subsections evaluate the project's potential impacts on the historic resources in the project area.

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Impacts to the South Pasadena Historic Business District

The proposed project would develop a surface parking lot in the historic district but would not demolish or alter any buildings within the district. The project's historic resources report (ARG 2015) summarizes the project's impacts on the historic district:

The Secretary of the Interior's Standards for the Treatment of Historic Properties advise that "the relationship of buildings to each other, setbacks, fence patterns, views, driveways and walkways, and street trees together create the character of a district or neighborhood."

In a number of these aspects, the project is compatible with the character of the historic district. The contributing buildings form an urban setting that defines the character of Mission Street, forming a dense yet low-rise retail and commercial environment that exists alongside the residential and institutional areas directly behind to the north and south, which differ in character. The City identified in the Mission Street Specific Plan the goal of filling in several sites with compatible development and clearly considered the project site's empty frontage as a condition to be remedied. The majority of the portion of the district on Mission Street consists of one- and two-story commercial buildings. The historic condition of the School District site, arguably, is at odds with the goal of maintaining a cohesive commercial district. The block-long break in the commercial fabric of the district, and of the city's historic commercial core, is a historical fact of the district. However, the inclusion of additional commercial frontage represents a historically compatible use within the district and strengthens the urban fabric of the contributing buildings.

To further analyze the project's impact on the historic district, and as a conservative approach, the consulting historians evaluated the project against the Secretary of the Interior's Standards for Rehabilitation. This analysis, which is contained in Section 7.3 of the historic resources report (**Appendix D**), evaluated the project against all ten of the Standards for Rehabilitation and concludes that the project is consistent with all of the standards, with the exception of Standard #2 and potentially Standard #8. The project's consistency with each of the Secretary's standards is analyzed below.

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.*

The project meets Standard #1. The uses in the proposed mixed-use project are the same as those of the historic district, and they are compatible with the district due to their location and arrangement within the site. The proposed commercial components face the established commercial corridor and the residential components are located on side streets, which also contain residential uses. The Mission/El Centro corridors are mixed in a range of three uses: commercial, residential, and institutional.

The Mission Street area of the historic district is primarily commercial at the ground floor, including retail shops, restaurants, and other casual eating establishments. These uses are similar to those that historically existed on this portion of Mission, though a good deal of change over the years meant that some of the buildings held light industrial uses for a time after the period of significance. The types of businesses that are anticipated in the ground-floor retail spaces provided along Mission Street in the proposed project represent a continuation of the uses seen today in the district, which are, in turn, compatible with the historic uses along the street.

The district also contains second-floor apartments in several of the contributing properties, as it did historically. While the amount of new housing in the project represents the introduction of a large new population of residents, this is not out of line with the historic conditions. Second-floor apartments over retail historically provided modest housing close to jobs and transportation and an opportunity for shop owners to live adjacent to their work. While such a relationship is not anticipated here, and has become very rare in small downtowns, one of the functions of the new residential population would be similar to the historic function: residents within the immediate neighborhood help to support the presence of street-level retail within walking distance, thereby supporting the main function of the commercial district as well as the Public Library.

- 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.*

The project has potential impacts under Standard #2 due to the loss of the wall that surrounds the El Centro School playground (now parking lot) and the loss of the open area of the playground itself, which is a historic condition of the district. Loss of the wall and playground space represents a change in the district with the removal of a familiar feature of the Mission Street frontage. The wall most likely dates to the last two years of the 40-year period of significance when El Centro School was built in 1928. Prior to that, the two schools that preceded it on the property were placed in the center of the property, not along the edge (see further discussion of this property in the discussion of Standard #9 below).

- 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.*

The project meets Standard #3. There are no falsely historic elements to the project, since the proposed new buildings are clearly differentiated as contemporary buildings through their design, massing, etc.

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

The project meets Standard #4. The period of significance for the historic district is very broad in date—over 40 years—and effectively extends through 1931, the date of the completion of the auditorium at El Centro School. No features or buildings post-dating this period were noted, though it is unclear why the Central Market, built in 1930, was excluded from the district when it dates to the same year as the Public Library. Per the project historians, there are no later periods of historical significance in the district that should be recognized.

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

Standard #5 does not apply. There is no physical treatment of historic buildings in the district as part of the project.

- 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.*

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Standard #6 is not applicable to the project. There is no physical treatment of historic buildings in the district as part of the project.

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.*

Standard #7 is not applicable to the project. No chemical or physical treatments of the historic buildings in the district are proposed within the scope of the project.

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

It is possible that remnants of foundations of the earlier school buildings on the site could be discovered in the course of excavation for the parking garage. Any such remains cannot be protected or preserved in place due to the construction of the project's parking garage. It appears that any such remains would be fragmentary and would not provide significant information that cannot be gleaned from earlier maps, photographs, and other documentation. However, in the unlikely event that more extensive remains are found, guidance from the California Office of Historic Preservation may be necessary to determine their treatment.

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 shall 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.*

The project meets Standard #9. The project is much larger than the existing buildings in the district in terms of its actual height, which is one story greater than that of surrounding buildings, and in terms of its footprint, which occupies approximately two-thirds of a single block. However, the project has been designed to skillfully mitigate the potential impact of the building's size through massing, setbacks, and articulation of the façades, as described below. These characteristics of the project's design modulate the transitions between the historic buildings and new construction.

The proposed new construction represents a change in the district's spatial relationships. The School District property, which includes the former El Centro School and playground (now the project site), has housed a succession of different buildings over the years. It was typical in the developing towns of Southern California to have civic and institutional buildings located nearby the commercial core. A block dedicated to a schoolhouse was typically a part of this grouping. The earliest building on the El Centro School block was set in the center of the block in the late nineteenth century. By the time the fourth (and current) school building was constructed, the typical Southern California schools had changed, with the front entrance to the main building set back slightly from the street frontage to provide for plantings and a lawn, and any additional buildings arranged in wings located around the front and side perimeter of the site, close to the street, to allow for a large amount of space left open for playgrounds in the rear/interior of the block. The rear of the site typically had no buildings (as this property illustrates).

The brick and concrete wall that surrounds the site appears to have been built at the same time as the school with a small pedestrian gate located on Mission Street and vehicle entrances on the side streets.

The characteristics of historic materials, features, size, scale and proportion, and massing are called out in Standard #9 for compatibility with historic properties in order to “protect the integrity of the property [in this case, the historic district] and its environment.” The compatibility of each of these aspects is discussed individually below.

Historic materials: Brick and stucco are the primary materials employed, with hipped roofs clad in clay tile. The restraint in the selection of materials for the project is appropriate to a historic district that contains generally very simple, vernacular buildings. The differentiation of materials and treatments between the east and west buildings helps to break up the mass of the project, but the selection of materials appears to be within an appropriate range so that the contrast does not produce a disjointed effect with regard to its surroundings or of the buildings to each other.

Features: Architectural features such as roofs, windows, balconies, cornices, and string courses provide architectural interest and serve the uses of the building. The balconies are set within the mass of the building and have unobtrusive railing details. The windows are simple and large. Belt courses define the stories on the exterior. Most of the building’s mass is covered by partial hipped roofs (with flat roofs in the center for solar panels and mechanical equipment). The east building of the complex has a parapet surrounding a flat roof, a treatment that echoes the roof form of all of the district contributors on Mission Street. Some architectural features of the project, such as balconies and dormers, differ from those of the contributing buildings, but they are fairly consistent with the overall tone of the district. These features, while not found historically in the district, reinforce the residential uses of the second floors of most of the district contributors and help to support the breaking down of the mass of the buildings and the downplaying of the appearance of the third story.

Size: While the size of the project makes it larger than any existing building within the district, a significant effort has been made to adjust the actual and apparent width and height of the frontage on Mission Street and Diamond Avenue and concentrate the full three-story portions of the design in the center of the block. On Mission, the setback of the third floor on the east commercial building and the use of an attic story for the third level on the west building allow for a cornice line or eave line at a two-story height. The height of this line is consistent with the overall height of the contributing historic buildings on Mission Street.

Scale and proportion: As with the selection of materials, the opening between the two buildings helps to bring down the apparent size of the project. Design guidelines for mixed-use developments often refer to the “apparent width” of the building, in which smaller or regularly spaced features (such as the porches on the Diamond Avenue façade) define the scale of the building. These elements allow a larger building to be read in terms of the rhythm of its features rather than the bulk of the overall mass. The difference in urban planning terms can be seen starkly when the proposed project’s Diamond Avenue frontage is compared to the buildings that border the east side of the district on Fairview Avenue south of Mission Street.

The west commercial building on Mission Street is divided into storefront openings and, at this point, is intended for a single tenant. The rhythm of piers between the glass openings divides the building into a number of bays in the manner of early twentieth century storefront design. Although this storefront would be greater in length than those of the district contributors, the multi-bay design breaks up the frontage and also allows for eventual subdivision of the space if desired. As noted above, the scale of the three-story frontage is significantly downplayed with the use of a cornice line at the second story and a third story contained behind dormers.

At the east building on Mission Street, a prominent brick cornice is intended as a visual termination to the second story. The third story is set back minimally above this, with darker

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cladding that is intended to minimize its appearance. The cornice may allow this frontage of the building to read as a two-story mass from the adjacent sidewalk, although the building will read as three stories from a greater distance, such as across the street.

The scale and proportion of the Diamond Street façade is regulated by a series of street entrances to residential units and raised planters between them to give a tighter rhythm to the street frontage and provide activity and visual interest. The façade includes references to the second-story cornice line that runs through much of the district, here in the form of a belt course on which the sills of the third floor windows sit. This banding/sill detail is also found (below second-story windows) on the main facades of most of the historic district's two-story contributors.

Massing: The project is composed of two separate buildings forming a single complex, divided by an open courtyard and paseo through the center of the block that runs north to south. The paseo would be open to the public most of the time and combines with private courtyards and the pool area in the center of the block. Massing around this central courtyard provides an opening at the sidewalk and light and air within the center of the block. The buildings generally conform to the sidewalk line along the three street frontages, which is consistent with the other contributing commercial buildings in the district.

Due to the size of the project, its massing does not repeat the massing of the historic district's contributing buildings. These are generally rectangular in plan and volume, as well as on the primary façade, with simple massing that maximizes the coverage of the lot. Since in most cases the buildings are smaller with many of them fitting into a single block, variation in massing within the block is provided by the fact that the buildings were separately constructed over the course of a span of time. While they mostly conform to a similar type, they also exhibit, within this consistency, varying height, width, articulation, color, and cladding patterns.

The project's massing, therefore, appears to be compatible with this characteristic of the district.

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.

The project meets Standard #10. While the size of the project and the scope of construction (including underground parking) would likely mean permanent or irreversible changes within the historic district, these are not necessarily changes that would adversely affect its historic significance. This conclusion is based on the analysis of the project under Standard #9 above. If, however, the project were to be removed in the future, it can be stated that the "essential form and integrity of the historic property and its environment would be unimpaired." The project does not physically come in contact with the surrounding buildings and does not involve the attachment of new buildings to existing buildings. The only feature of the district that is materially affected by the project is the wall around the School District Administration Building. This can be considered a minor, yet irreversible, change in the context of the district and does not rise to the level of impairing the essential form and integrity of the historic district or any individual historic resources within or adjacent to it.

Summary of Impacts to the Historic District

Based on the analysis above, the proposed project is compatible with the South Pasadena Historic Business District through its use of design and massing strategies that reduce the project's impacts to historic resources in its surroundings. The following aspects of the project illustrate how this has been accomplished:

- The project is located on the edge of the historic district and is directly adjacent to only one of the district contributors: the El Centro School buildings (SPUSD Administration Buildings). Though the school and the project share a site (a full square block), the proposed buildings do not touch the existing buildings (eliminating the need for any alteration to historic fabric of the school buildings themselves) and are essentially oriented back to back. The school is oriented south toward the Public Library and the project is principally oriented north toward Mission Street. The project is separated from other adjacent contributing buildings by through streets.
- Although the proposed project is much larger in size and has a much larger footprint than the contributing buildings in the historic district, the massing is brought down to a scale that is compatible with that of the rest of the district by separation into two buildings. A courtyard or paseo is inserted in the center of the block, accessible to the public from Mission Street, providing light, air, and space within the block. The variations in the roof line and footprint of the new buildings also add visual interest which serves to break up the project mass.
- The scale of the project is brought into line with district contributors through the use of various architectural devices. These include limiting the appearance of the building height on Mission Street by subsuming the third story within the roofline and recessing it slightly above a cornice line; employing projecting entrances and recessed balconies to create variation in the wall plane and a tighter rhythm to the side façades and roof lines, reducing the apparent width of the façade; and sizing window and entrance openings so they are compatible with the scale of those found throughout the commercial buildings in the historic district.
- The materials of the project are similar to those of the contributing buildings in the district, including stucco and brick wall cladding. Other materials used sparingly, such as metal balcony railings and dark sheet metal employed at the third story, are also compatible with the district.
- Vehicle entry for the underground parking garage is split between the east and west access points. The less intensively used residential parking entrance faces into the historic district, while the commercial parking and loading entrance is on Fairview Avenue, facing away from any contributing buildings of the district.

However, as noted above, the project has potential impacts under Standard #2 due to the loss of the wall that surrounds the El Centro School playground (now parking lot) and the loss of the open area of the playground itself, which is a historic condition of the district. Loss of the wall and playground space represents a change in the district with the removal of a familiar feature of the Mission Street frontage. The wall most likely dates to the last two years of the 40-year period of significance when El Centro School was built in 1928. Prior to that, the two schools that preceded it on the property were placed in the center of the property, not along the edge.

In conclusion, the project would result in changes in the spatial relationships of the South Pasadena Historic Business District. The loss of the perimeter wall and the space historically used as a playground for the former El Centro School represents a change in the historic condition of the district. Although the space itself is intact, no historic playground or landscape features exist since this portion of the property has been used as a parking lot for nearly 40 years. Nonetheless, this would be a potentially significant impact requiring mitigation measure **MM 3.2.1a**.

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Impacts to Individual Resources

Three individual historic resources are located adjacent to the project site: the South Pasadena Public Library and the South Pasadena Bank Building are both locally designated (in addition to being contributors to the historic district), and El Centro/Central Market was determined to be individually eligible for the National Register (2S). El Centro School/SPUSD Administration Building, while not an individual resource, is also of particular sensitivity due to the greater potential for impacts to this particular property given its location on the project site. The following subsections discuss impacts to these resources as a supplement to the standards discussion above.

South Pasadena Public Library

This property includes both the 1930 Public Library building and the public park known as Library Park that surrounds it. The library and park are somewhat buffered from the project's visual impacts because of the new buildings' location behind the School District Administration Building and the relative heights of the old and new buildings on the north side of El Centro. There would be little visual impact to the library due to this visual buffer. It is also not necessary for the new building to be invisible from the library in order to avoid an impact on the library. Larger, newer buildings within the sightlines of the building are not enough to constitute an impact under CEQA. Section drawings through El Centro Street demonstrate that a person standing in the middle of the street or on the sidewalk in front of the School District Building would most likely be unable to see the new buildings at all. The project would likely come into view from the other side of the street, within Library Park, and it would be visible from the corner of Library Park through the view corridor of Diamond Avenue. The project does not compromise the eligibility of the Public Library as a local historic resource.

South Pasadena Bank Building

Located on a corner adjacent to Library Park and the School District Building, the South Pasadena Bank Building is a small two-story building clad in brick. The project would be visible from the resource along Diamond Street and possibly over the roofline of the School District building. The Oakwood Apartments, another large, new building, already exist in the surroundings of the South Pasadena Bank Building. While the setbacks of that building allow for more plantings along Diamond Street, the project's urban quality is arguably more consistent with the character of the district, where only institutional buildings feature landscaped setbacks and commercial and/or residential buildings are built to the sidewalk line. The project does not significantly compromise the setting or affect the eligibility of the bank building as a local historic resource.

El Centro Market

This one-story, L-shaped commercial building is located directly north of the project site, across Mission Street at the northwest corner of Mission and Fairview. It was determined eligible for the NRHP by the Keeper of the National Register in 2001 but not listed due to owner objection. It was listed in the CRHR due to the Keeper's determination. The project does not have an adverse effect on the El Centro Market because it does not "materially alter in an adverse manner" those qualities that qualify the property for the California Register or National Register. The building is located on the other side of the street, in a commercial district of mostly two-story buildings. The addition of another two- and three-story building in its setting does not represent a significant alteration of the setting of the building. As noted in the discussion of the standards above, the project's Mission Street frontage is modulated so as to minimize the bulk of the new construction, and the design and materials are compatible with the character of the historic district. The project does not compromise the eligibility of the property as an individual historic resource.

El Centro School/South Pasadena School District Administration Building

Due to the location of the project on the same site, the former El Centro School merits special consideration to examine impacts more closely. The eligibility of this 1928 former school building, now the School District Administration Building, is considered as an individual historic resource aside from its contributing status for the historic district.

The 1928–1931 El Centro School building has been altered significantly, both on the exterior and the interior. Since 1977, it has been used as offices for the School District and has not been used as a school. The building has been subdivided for office use, and the interior retains little historic integrity due to the apparent reconfiguration of spaces. The exterior was originally clad in brick, areas of which are no longer exposed due to the effects of seismic retrofit that resulted in the removal or covering of distinctive brick cladding of the building, significantly altering its architectural character. Another major alteration to the building was the loss of its bell tower in 1949, also for seismic safety reasons. This was a major feature of the building that gave it a stronger relationship to the library across El Centro and also made it more visible from Mission Street in the commercial district. The change from a school building in the center of the lot to a school building along the south frontage and a playground to the north occurred in 1928, coinciding with the Sanborn Map of that date.

Under the criteria of the California Register, the property does not appear to be individually eligible under Criterion 1 or 2 for association with a historic event or pattern of events or association with a significant person. The history of the city and of its institutions has been studied and published in recent years, and no information has come to light regarding the school that would support a claim of significance for this property under Criterion 1 or 2.

The property also does not appear eligible under California Register Criterion 3 for its architectural significance. The building was a handsome addition to the School District's properties when it was constructed, and it was designed by a prominent local architect, Norman Foote Marsh. However, the alterations that occurred to the building for seismic upgrades in 1947 significantly diminished the building's character. Large areas of patterned brick were replaced with stucco, some glazed and operable bays were infilled, and the medallions and other articulation of the end bays were removed or covered. Most significantly, the bell tower was removed. Further alterations to the exterior corridors appear to have taken place as well.

Due to lack of eligibility for the California Register, the property is not considered an individual historic resource for purposes of CEQA. While the Administration Building and the Boardroom Building are not individual historic resources, they are contributing resources to the South Pasadena Historic Business District. Thus, physical damage to these structures could adversely affect the historic district. While no alterations of these structures are proposed, construction of the proposed project has the potential to generate vibrations that could damage the buildings. Unmitigated vibration damage has the potential to significantly impact these contributing buildings.

Summary of Impacts and Mitigation Measures

The project would result in changes in the spatial relationships of the South Pasadena Historic Business District. The loss of the perimeter wall and the space historically used as a playground for the former El Centro School represents a change in the historic condition of the historic district. Although the space itself is intact, no historic playground or landscape features exist since this portion of the property has been used as a parking lot for nearly 40 years. Nonetheless, this would

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be **potentially significant** impact and implementation of mitigation measure **MM 3.2.1a** is required.

The project has the potential to impact the SPUSD Administration Building (former El Centro School) through ground vibrations and other risks associated with adjacent construction. A relevant National Park Service Preservation Tech Note, "Protecting a Historic Structure During Adjacent Construction," is included as part of **Appendix D** to provide further information. This impact would be **potentially significant** and implementation of mitigation measure **MM 3.2.1b** is required.

Mitigation Measures

MM 3.2.1a To address the change of a historic condition of the district, the applicant shall be responsible for the following:

- The property shall be documented with Historic American Buildings Survey (HABS)-type photographic documentation, including the building exteriors, any significant interiors such as the SPUSD Boardroom, the perimeter wall, and the former playground (parking lot) space. The photographs may be 35mm and shall be deposited in the local history collection of the South Pasadena Public Library.
- Any revisions to project plans shall be reviewed by a qualified preservation architect or preservation professional (per the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61)) to ensure that the project continues to maintain its compatibility with the historic character of the district at a level comparable to that of the plans reviewed for this document.
- Any preservation or architectural treatments that may be planned in the course of the project for the former El Centro School building shall meet the Secretary of the Interior's Standards and be designed and carried out subject to the approval of an architect or historic preservation consultant who meets the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61) for historic architecture and/or architectural history.

MM 3.2.1b To characterize the potential for damage to historic resources due to ground vibrations, the project applicant shall retain a qualified structural engineer with expertise in the evaluation of historic buildings and the effect of ground vibrations from adjacent construction. The structural engineer will review construction plans and monitor construction to ensure protection of adjacent historic resources to limit the potential effect of vibrations caused by demolition, excavation, and construction activities associated with the project. Results shall be submitted to the Superintendent of the SPUSD and to the City of South Pasadena.

The structural engineer shall prepare and submit a report to the superintendent that minimally includes the following:

- Description of existing conditions at the existing SPUSD Administration and Boardroom buildings.

- Vibration level limits based on building conditions, soil conditions, and planned demolition and construction methods to ensure vibration levels would be below 0.12 peak particle velocity inches per second (ppv in/sec) or below an alternative vibration level that is determined does not have the potential for damaging the existing SPUSD Administration and Boardroom buildings.
- Specific measures to be taken during construction to ensure the specified vibration level limits are not exceeded.
- A monitoring plan to be implemented during demolition and construction that includes post-construction and post-demolition surveys of the existing SPUSD Administration and Boardroom buildings.

Examples of measures that may be specified for implementation during demolition or construction include, but are not limited to:

- Prohibition of certain types of impact equipment.
- Requirement for lighter tracked or wheeled equipment.
- Specifying demolition by non-impact methods, such as sawing concrete.
- Phasing operations to avoid simultaneous vibration sources.
- Installation of vibration measuring devices to guide decision making for subsequent activities.

The proposed project's design (through massing, materials, articulation, etc.) on the site of the El Centro School/SPUSD Administration Building for the most part effectively manages the project's potential impact on the South Pasadena Historic Business District. With mitigation measures **MM 3.2.1a** and **MM 3.21.b**, project impacts would be clearly mitigated to a **less than significant** level.

Disturb Archaeological Resources (Standard of Significance 2)

Impact 3.2.2 While the project site is not sensitive for prehistoric archaeological resources, remains from previous school structures on-site could be encountered during grading. It is likely that such remains, if found, would be fragmentary and would not provide significant information that cannot be gleaned from other available sources. Nonetheless, the potential to encounter historic archaeological resources is considered a **potentially significant impact** that requires mitigation.

The project site is located in a developed area, with soils on-site previously disturbed by past construction activities. Consequently, the site is not considered sensitive for prehistoric archaeological resources. However, the site could be sensitive for historic-era archaeological resources. The project block is in the South Pasadena Historic Business District and was the site of El Centro School, which housed four known iterations of school structures, with the original schoolhouse dating back to the late nineteenth century. The project's historic resources report (**Appendix D**) provides the following description of the site's history and analysis of the project's potential to encounter historic archaeological resources:

3.2 CULTURAL RESOURCES

The School District property, which includes the former El Centro School and playground (now the project site), has housed a succession of different buildings over the years. It was typical in the developing towns of Southern California to have civic and institutional buildings located nearby the commercial core. A block dedicated to a schoolhouse was typically a part of this grouping. The earliest building on the El Centro School block was set in the center of the block in the late nineteenth century. By the time the fourth (and current) school building was constructed, the typical Southern California schools had changed, with the front entrance to the main building set back slightly from the street frontage to provide for plantings and a lawn, and any additional buildings arranged in wings located around the front and side perimeter of the site, close to the street, to allow for a large amount of space left open for playgrounds in the rear/interior of the block. The rear of the site typically had no buildings (as this property illustrates). The brick and concrete wall that surrounds the site appears to have been built at the same time as the school with a small pedestrian gate located on Mission Street and vehicle entrances on the side streets.

As a result of the evaluation in this report...we believe it is possible that remnants of foundations of the earlier school buildings on the site could be discovered in the course of excavation for the parking garage. Any such remains cannot be protected or preserved in place due to the construction of the parking garage. It appears that any such remains would be fragmentary and would not provide significant information that cannot be gleaned from earlier maps, photographs, and other documentation. However, in the unlikely event that more extensive remains are found, guidance from the State Office of Historic Preservation may be necessary to determine their treatment.

The potential for the project to encounter intact foundations of earlier school buildings on-site is considered a significant impact. Mitigation measure **MM 3.2.2** is included to ensure that any such resources, if found, are properly handled and recorded.

Mitigation Measures

MM 3.2.2 Should subsurface remains be discovered on-site and prove to be more intact or extensive than anticipated, the project applicant shall consult with a registered professional archaeologist to develop a discovery and monitoring plan in consultation with the California Office of Historic Preservation (OHP). The plan shall meet with the satisfaction of the OHP, which shall be afforded the opportunity to provide guidance for any documentation deemed necessary. The types of remains that, if discovered, would warrant some level of recordation include an intact basement and/or extensive foundations in situ.

With the incorporation of mitigation measure **MM 3.2.2**, the proposed project would not cause a significant impact on archaeological resources.

Disturb Paleontological Resources (Standard of Significance 3)

Impacts 3.2.3 The project could indirectly result in the potential disturbance of undiscovered paleontological resources ((i.e., fossils and fossil formations). This impact would be **potentially significant**.

The project site is located in a developed area, with soils on-site having been previously disturbed by past construction activities. No unique geologic or paleontological resources are

known to occur on-site and, due to the level of past disturbance, it is not anticipated that paleontological resource sites exist within the project area. In the unlikely event that paleontological resources are encountered during grading or construction of the project, mitigation measure **MM 3.2.3** requires standard best practices to be implemented to avoid or properly excavate and record the find. With inclusion of this mitigation measure, potential impacts related to accidental discovery of paleontological and/or unique geologic resources would be less than significant.

Mitigation Measures

MM 3.2.3 If paleontological resources are encountered during project construction, all construction activities in the vicinity of the find shall halt until a paleontologist meeting the satisfaction of the Natural History Museum of Los Angeles County identifies the paleontological significance of the find and recommends a course of action. Construction shall not resume until the site paleontologist states in writing that the proposed construction activities will not damage significant paleontological resources.

Implementation of mitigation measure **MM 3.2.3** would mitigate potentially significant impacts on archaeological and paleontological resources and human remains to **less than significant**.

3.2.4 CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

CUMULATIVE SETTING

The cumulative setting associated with the project includes the project area and the city of South Pasadena as well as the surrounding area in Los Angeles County. Most cultural resources impacts as described in the CEQA Guidelines are generally site-specific and not cumulative in nature, as impacts generally vary by site characteristics and site history. However, continued growth in the region would contribute to potential conflicts with cultural and paleontological resources. These resources include archaeological resources associated with Native American activities and historic resources associated with settlement, farming, and economic development.

CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Impacts on Cultural Resources, Human Remains, and Paleontological Resources

Impact 3.2.5 The project, in addition to existing, approved, proposed, and reasonably foreseeable development in the region, could result in cumulative impacts to cultural resources. This impact would be **not cumulatively considerable**.

The project, in combination with other development projects in the surrounding region, would not result in a cumulative loss of historic resources in the region. As previously discussed, the project would have a less than significant impact with mitigation incorporated on the surrounding historic district and buildings. The project would not compromise the historic district's and its individual buildings' eligibility and would incorporate mitigation measures, as described in **MM 3.2.1a** and **MM 3.2.1b**, to further protect historic resources in the project area. As such, and with implementation of mitigation measures **MM 3.2.1a** and **MM 3.2.1b**, the project's contribution to this potential impact would be **not cumulatively considerable**.

3.2 CULTURAL RESOURCES

The project, in combination with other development projects in the surrounding region, could result in a cumulative loss of known and previously undiscovered cultural and paleontological resources in the region. It should also be noted that each development proposal near the project site received by the City of South Pasadena would undergo further environmental review of project-specific impacts prior to approval. Continued compliance with Health and Safety Code Section 7050.5(b) and implementation of mitigation measures **MM 3.2.3** and **MM 3.2.3** would ensure that if cultural or paleontological resources or human remains are discovered during construction, impacts would be properly mitigated. Therefore, the project's contribution to this potential impact would be **not cumulatively considerable**.

Mitigation Measures

None required.

3.2.5 REFERENCES

Architectural Resources Group, Inc. 2015. *Mission Place – Evaluation of Impacts to Historic Resources*.

3.2 CULTURAL RESOURCES

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