

## 3.5. CULTURAL RESOURCES

The following summarizes the applicable regulations and the existing setting and provides a detailed impact assessment related to Cultural Resources. Refer to the Historic Resources Technical Report (Appendix K) and the Archaeological and Tribal Cultural Resources Technical Report (Appendix E) for additional details related to applicable regulations and the existing setting.

### 3.5.1 Regulatory Framework

#### 3.5.1.1 Federal Regulations

**National Register of Historic Places (National Register).** The National Register is the 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.<sup>1</sup> 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. The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”<sup>2</sup> A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.<sup>3</sup>

#### 3.5.1.2 State Regulations

**California Register of Historical Resources (California Register).** The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.<sup>4</sup> The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. It is possible that properties may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. An altered property may still have sufficient

---

<sup>1</sup> Title 36 Code of Federal Regulations Part 60.2.

<sup>2</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, accessed March 31, 2020, [https://www.nps.gov/subjects/nationalregister/upload/NRB-15\\_web508.pdf](https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf), 5.

<sup>3</sup> Title 36 Code of Federal Regulations Part 60.3(d).

<sup>4</sup> Public Resources Code Section 5024.1 (a).

integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.<sup>5</sup> A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance.<sup>6</sup>

**California Public Resources Code (PRC).** Archaeological and historical sites are protected pursuant to policies and regulations enumerated under the California PRC. California PRC Sections 5020–5029.5 continue the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. California PRC Sections 5079–5079.65 define the functions and duties of the Office of Historic Preservation (OHP). The OHP is responsible for the administration of federally and state-mandated historic preservation programs in California and the California Heritage Fund. California PRC Sections 5097.9–5097.991 provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods. California PRC Section 21083.2(g) protects archaeological resources. California PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

**Assembly Bill (AB) 52.** AB 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that tribal cultural resources must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Refer to Section 3.10 Tribal Cultural Resources for additional details related to AB 52.

**California Health and Safety Code.** The California Health and Safety Code Section 7050.5(b) specifies protocol when human remains are discovered. Specifically, burials or human remains found either inside or outside a known cemetery are not to be disturbed or removed unless by authority of law, and the area of a discovery of human remains should remain undisturbed until the County Coroner is notified and has examined the remains prior to determining the appropriate course of action.

### 3.5.1.3 Local Regulations

Each of the cities within the Project Area have passed resolutions related to historic and archeological resources. These resolutions are usually included in their general plans, which provide additional guidance on assessment and treatment measures for projects subject to

---

<sup>5</sup> California Code of Regulations Section 4852 (c)

<sup>6</sup> California Code of Regulations Section 4852 (d) (2).

CEQA compliance. In addition, a preservation ordinance has been adopted by each city to address local designation and treatment of historic resources. Provided below is a summary of relevant policies for the cities within the Project Area.

### City of Los Angeles

The City of Los Angeles General Plan is a comprehensive, long range declaration of purposes, policies and programs for the development of the City. The Conservation Element of the General Plan identifies paleontological, archaeological, and historic cultural resources within the City of Los Angeles and describes objectives, policies, and programs for their protection, preservation, and management.<sup>7</sup> The relevant objective is to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.

The North Hollywood-Valley Village Community Plan and the Northeast Los Angeles Community Plan guide the development of their respective neighborhoods through land use goals, policies, issues and opportunities.<sup>8,9</sup> The relevant objective of the plans is to preserve and enhance neighborhoods with a distinctive and significant historical or architectural character.

In the City of Los Angeles, the procedures for Historic-Cultural Monument designations and their preservation are described in the Cultural Heritage Ordinance (Number 178,402, effective April 2, 2007). The ordinance also establishes the Cultural Heritage Commission and defines its roles and responsibilities.<sup>10</sup>

### City of Burbank

The City of Burbank's 2035 General Plan is a comprehensive, long range declaration of purposes, policies and programs for the development of the City. The Burbank 2035 General Plan addresses cultural resources in the Land Use Element. The Open Space and Conservation Element contains policies for paleontological resources.<sup>11</sup> The relevant objective is to maintain a careful balance between a desire for economic prosperity and the high quality of life valued by the Burbank community.

The City of Burbank's historic preservation regulations are outlined in the Historic Resources Management Ordinance, including the procedures for designating and maintaining historic properties and the duties and responsibilities of the Heritage Commission. The Historic Preservation Plan provides further direction for implementing the ordinance with specific guidelines and polices for historic preservation.<sup>12</sup>

---

<sup>7</sup> City of Los Angeles Department of City Planning, *Los Angeles General Plan – Conservation Element*, 2001.

<sup>8</sup> City of Los Angeles, *North Hollywood-Valley Village Community Plan*, 1995

<sup>9</sup> City of Los Angeles, *Northeast Los Angeles Community Plan*, 1999.

<sup>10</sup> City of Los Angeles Municipal Code, *Cultural Heritage Ordinance (Number 178,402)*, 2007.

<sup>11</sup> City of Burbank, *Burbank 2035 General Plan*, 2013.

<sup>12</sup> City of Burbank Municipal Code, *Historic Resource Management Ordinance (Number 10-1-925)*, 2011.

### City of Glendale

The City of Glendale's General Plan is a comprehensive, long range declaration of purposes, policies and programs for the development of the City. The Historic Preservation Element of the General Plan outlines policies, goals, and objectives that are applicable to cultural resources.<sup>13</sup> The relevant goals are to preserve historic resources which define community character and to create and continue programs and practices which enable an appreciation of history and historic preservation.

Local historic preservation regulations include the Historic Preservation Ordinance (Glendale Municipal Code, Section 15.20), which pertains to the Glendale Register of Historic Resources, and the Historic District Overlay Zone Ordinance (Glendale Municipal Code, Section 30.25), which outlines procedures for historic districts. The Demolition Review Ordinance (Glendale Municipal Code, Section 15.22) includes requirements for proposed demolitions of properties over 30 years old. The roles and duties of the Historic Preservation Commission are codified in Glendale Municipal Code, Section 2.76.<sup>14</sup>

### City of Pasadena

The City of Pasadena's General Plan is a comprehensive, long range declaration of purposes, policies and programs for the development of the City. The Land Use Element of the General Plan includes goals and policies to provide for community conservation and strategic growth, preserving existing neighborhoods and targeting new development to infill areas that are vacant or underutilized, and are scaled and designed to complement existing uses.<sup>15</sup> In regards to historic resources, the General Plan outlines the following Guiding Principle: "Pasadena's historic resources will be preserved. Citywide, new development will be in harmony with and enhance Pasadena's unique character and sense of place. New construction that could affect the integrity of historic resources will be compatible with, and differentiated from, the existing resource."<sup>16</sup>

The Historic Preservation Ordinance (Pasadena Zoning Code, Section 17.62) outlines procedures related to historic resources in the City of Pasadena. It includes the processes for designating historic landmarks and landmark districts, criteria for designation, the process for the acquisition of historic façade easements, and processes for the alteration, demolition, or relocation of a historic resource. It also outlines available incentives for preserving historic resources as well as the powers and duties of the Historic Preservation Commission.<sup>17</sup>

---

<sup>13</sup> City of Glendale, *General Plan, Historic Preservation Element*, 1993.

<sup>14</sup> City of Glendale Municipal Code, *Historic Preservation Ordinance (Number 15.20, 15.22, 15.25, 2.76)*, 1996.

<sup>15</sup> City of Pasadena, *Land Use Element of the City of Pasadena General Plan*, 2015, amended 2016.

<sup>16</sup> *Ibid.*, 1-1.

<sup>17</sup> City of Pasadena Municipal Code, *Historic Preservation Ordinance (Number 17.62)*, 2007.

## 3.5.2 Existing Setting

### 3.5.2.1 Historic Resources

The Historical Resources Survey Area was limited to the public ROW for the length of the entire alignment, except at possible station platform locations, where the survey area was increased to include properties abutting the ROW within approximately 100 feet of the proposed station platform footprint. Since potential for impacts resulting from a change in setting are limited to areas where stations are proposed, defining the Historical Resources Study Area in this way resulted in a level of effort in line with the potential impact of the Proposed Project.

A reconnaissance survey of all properties over 45 years of age within the Historical Resources Study Area was conducted to identify properties that appeared to be potential historical resources. Potential historical resources were defined as those properties that are over 45 years of age, have apparent potential significance, and retain a moderate to high level of integrity (i.e., it retains sufficient integrity to convey its potential significance). The determination of “potential significance” was made by qualified architectural historians utilizing the applicable historic contexts. For properties located in the City of Los Angeles, this encompassed those historic contexts included in the City of Los Angeles’ Citywide Historic Context Statement and SurveyLA<sup>18</sup> methodology for evaluating potential historical resources. For those properties located within the cities of Burbank, Glendale, and Pasadena, existing historic context statements prepared by the respective municipalities were utilized to the extent possible and are described in the Historic Resources Technical Report (Appendix K).

Records searches in the California Historical Resources Information System (CHRIS) were conducted at the South Central Coastal Information Center (SCCIC) to obtain previously recorded resources and reports within the Project Area. The record search radius was 0.25-miles from the center of the BRT alignment. Various portions of the Project Area have been the subject of previous historic context statements and historic resources surveys.<sup>19</sup> These were reviewed to identify previously evaluated historic resources and inform the historic context statement. A total of 309 previously recorded resources are located within the 0.25-mile record search radius and only one resource is prehistoric. Four of the previously recorded built environment resources overlap the alignment, and 68 are immediately adjacent to the alignment. **Table 3.5-1** shows all designated, previously surveyed, and potentially significant properties identified through Project reconnaissance within the Historical Resources Study Area. Refer to the Historic Resources Technical Report (Appendix K) for mapped locations of the resources, which are shown in a series of 19 maps. The maps were not included in the body of the Draft EIR to limit the length of the document.

---

<sup>18</sup> SurveyLA is the City of Los Angeles Citywide Historic Resources Survey.

<sup>19</sup> See *Historic Resources Technical Report* for additional information regarding previously reviewed historic resources surveys.

**Table 3.5-1 – Designated, Previously Surveyed, and Potential Historical Resources Identified Within the Historic Resources Study Area**

Map Ref. No	Address	City/Neighborhood	Year Built	Designated (Name), Previously Surveyed (Survey Name), or Identified
1	11275 Chandler Blvd	Los Angeles/North Hollywood	c. 1895	Previously Surveyed (CHRIS #P-19-186585)
2	5025 Lankershim Blvd	Los Angeles/North Hollywood	1971	Previously Surveyed (SurveyLA)
3	3000 W. Alameda Ave	Burbank	1956	Identified through Project Survey
4	142 E. Olive Ave	Burbank	1974	Identified through Project Survey
5	175 E. Olive Ave	Burbank	1972	Identified through Project Survey
6	N. Central Ave Streetlights	Glendale	1924-1926	Identified through Project Survey
7	346 N. Central Ave	Glendale	1934	Previously Surveyed (Downtown Specific Plan)
8	336 N. Central Ave	Glendale	1960	Previously Surveyed (Downtown Specific Plan)
9	100 N. Brand Blvd	Glendale	1923	Designated (GR #16; Security Trust and Savings Bank)
10	E. Broadway Streetlights	Glendale	1921	Previously Surveyed (Downtown Specific Plan)
11	222 E. Harvard St	Glendale	1973	Previously Surveyed (Downtown Specific Plan)
12	613 E. Broadway	Glendale	1940	Designated (GR #31; Glendale City Hall)
13	633 E. Broadway	Glendale	1966	Previously Surveyed (Downtown Specific Plan)
14	600 E. Broadway	Glendale	1959	Previously Surveyed (Downtown Specific Plan)
15	701 E. Broadway	Glendale	1924	Designated (GR #17; Hotel Glendale)
16	101 N. Verdugo Rd	Glendale	ca.1973	Identified through Project Survey
17	1401 E. Broadway	Glendale	1949	Previously Surveyed (South Glendale)
18	1377 E. Colorado St	Glendale	1922	Previously Surveyed (South Glendale)
19	1538 E. Wilson Ave	Glendale	1936	Previously Surveyed (South Glendale)
20	1542 E. Wilson Ave	Glendale	1935	Previously Surveyed (South Glendale)
N/A	Eagle Rock Commercial Historic District	Los Angeles/Eagle Rock	1910-1927	Previously Surveyed (SurveyLA)
21	2711 Colorado Blvd	Los Angeles/Eagle Rock	1964	Previously Surveyed (SurveyLA)
22	2557 Colorado Blvd	Los Angeles/Eagle Rock	1951	Previously Surveyed (SurveyLA)
23	2225 Colorado Blvd	Los Angeles/Eagle Rock	1914/1927	Designated (HCM #292; Old Eagle Rock Branch Library)

Map Ref. No	Address	City/Neighborhood	Year Built	Designated (Name), Previously Surveyed (Survey Name), or Identified
24	2160 Colorado Blvd/ Eagle Rock Commercial	Los Angeles/Eagle Rock	1915	Previously Surveyed (SurveyLA)
25	2144 Colorado Blvd/ Eagle Rock Commercial	Los Angeles/Eagle Rock	1922	Previously Surveyed (SurveyLA)
26	2124 Colorado Blvd/ Eagle Rock Commercial	Los Angeles/Eagle Rock	1910	Previously Surveyed (SurveyLA)
27	2116 Colorado Blvd/ Eagle Rock Commercial	Los Angeles/Eagle Rock	1927	Previously Surveyed (SurveyLA)
28	2108 Colorado Blvd/ Eagle Rock Commercial	Los Angeles/Eagle Rock	1912	Previously Surveyed (SurveyLA)
29	2106 Colorado Blvd/ Eagle Rock Commercial	Los Angeles/Eagle Rock	1925	Previously Surveyed (SurveyLA)
30	2102 Colorado Blvd/ Eagle Rock Commercial	Los Angeles/Eagle Rock	1912	Previously Surveyed (SurveyLA)
31	2028 Colorado Blvd/ Eagle Rock Commercial	Los Angeles/Eagle Rock	1924	Previously Surveyed (SurveyLA)
32	1627 Colorado Blvd	Los Angeles/Eagle Rock	1931	Designated (HCM #692; Dahlia Motors Building)
33	1620 Colorado Blvd	Los Angeles/Eagle Rock	1912	Previously Surveyed (SurveyLA)
34	1579 Colorado Blvd	Los Angeles/Eagle Rock	1923	Previously Surveyed (SurveyLA)
35	85 E. Holly St/ 195 N. Raymond Ave	Pasadena	1930	Designated (Memorial Park/Pasadena Civic Center National Register Historic District)
36	145 N. Raymond Ave	Pasadena	1932	Designated (Armory Building/Old Pasadena)
37	125 N. Raymond Ave	Pasadena	1921	Designated (Crown Theatre/Old Pasadena National Register Historic District)
38	95 N. Raymond Ave	Pasadena	1895	Designated (Adams & Taylor Funeral Home/Old Pasadena)
39	119 E. Union St	Pasadena	1915	Designated (Union Building/Old Pasadena)
40	35 N. Arroyo Parkway	Pasadena	1924	Designated (Broadway Building/Old Pasadena)
41	163 E. Union St	Pasadena	1905	Previously Surveyed (Historic Designed Gardens)
42	75 N. Marengo Ave	Pasadena	ca.1930	Designated (First Baptist Church/ Pasadena Civic Center)

Map Ref. No	Address	City/Neighborhood	Year Built	Designated (Name), Previously Surveyed (Survey Name), or Identified
43	177 E. Colorado Blvd	Pasadena	1970	Previously Surveyed (Historic Designed Gardens)
44	117 E. Colorado Blvd	Pasadena	1905	Designated (Chamber of Commerce/Old Pasadena)
45	45 S. Arroyo Pkwy	Pasadena	1916	Previously Surveyed (Pasadena Central District)
46	101 S. Marengo Ave	Pasadena	1974	Previously Surveyed (Recent Past, Historic Designed Gardens)
47	469 E. Colorado Blvd	Pasadena	1927	Designated (Thomas Warner Building/Pasadena Playhouse District)
48	464 E. Colorado Blvd	Pasadena	1930	Designated (Walter Gerlach Building/Pasadena Playhouse National Register Historic District)
49	500 E. Colorado Blvd	Pasadena	1925	Designated (First Methodist Church/Pasadena Playhouse District)
50	880 E. Colorado Blvd	Pasadena	1974	Identified through Project Survey
51	940 E. Colorado Blvd	Pasadena	1926	Designated (Pasadena Historic Landmark; Constance Hotel)
52	909 E. Green St	Pasadena	1952	Previously Surveyed (Pasadena Central District)
53	55 S. Hill Ave	Pasadena	1925	Designated (Pasadena Historic Landmark; Hill Avenue Library)
54	20 N. Raymond Ave	Pasadena	1901	Designated (Union Savings Bank Building/Old Pasadena)
55	80 E. Colorado Blvd	Pasadena	1886	Designated (Masonic Temple/Old Pasadena)
56	87 E. Colorado Blvd	Pasadena	1929	Designated ([No Name]/Old Pasadena)
57	96 E. Colorado Blvd	Pasadena	1896	Designated (Richardson Block/Old Pasadena)
58	97 E. Colorado Blvd	Pasadena	1902	Designated ([No Name]/Old Pasadena)
N/A	Various	Pasadena	1886-1936	Designated (Old Pasadena National Register Historic District)
N/A	Various	Pasadena	1910-1932	Designated (Civic Center National Register Historic District)
N/A	Various	Pasadena	1905-1928	Designated (Civic Center Financial National Register Historic District)
N/A	Various	Pasadena	1906-1940	Designated (Pasadena Playhouse National Register Historic District)

SOURCE: GPA Consulting, *Historic Resources Technical Report, 2020.*



There was a total of 23 designated properties (listed in the National, California, and/or local register), including 16 contributors to historic districts, and 29 properties previously surveyed and evaluated as potentially eligible (for listing in the National, California, and/or local register), including eight that are contributors to a potential historic district. An additional six potentially significant properties were identified through site reconnaissance efforts conducted for the Proposed Project.

The potentially historic streetlights on East Broadway and North Central Avenue in the City of Glendale are of particular importance to the Proposed Project due to proposed sidewalk improvements. Along Central Avenue and Broadway, the Proposed Project would be side or curb-running and proposed station platform footprints may result in the removal or relocation of potentially historic streetlights currently within the existing sidewalk. Conceptual engineering plans developed to support the Draft EIR show proposed station platform footprints that appear to conflict with the placement of approximately three potentially historic streetlights on Central Avenue and approximately three on Broadway. These include two streetlights at the northeast corner and one streetlight at the southwest corner of Central Avenue at Lexington Drive, one streetlight at the northwest corner of Broadway at Glendale Avenue, and two at the southeast corner of Broadway at Brand Boulevard. **Figure 3.5-1** shows one of the potentially historic streetlights.

### 3.5.3.2. Archaeological Resources

The Proposed Project is situated on lands that were once inhabited by the Gabrieleno (also known as the Tongva) and to the south of lands that were once inhabited by the Tataviam. As discussed, a records search was conducted at SCCIC to identify previously-recorded cultural resources and previous investigations within the Project Area and within a 0.25-mile radius. The records search reviewed technical reports and Department of Parks and Recreation site records. Additional consulted sources included the Historic Property Data File, which identifies resources listed on or determined eligible for listing on the National, California, and local registers, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility.

The Project Area consists of existing roadways and developed parcels. An assessment of the Project Area, via a review of historic and current aerial photographs and maps along with a windshield survey of the Project Area, indicated that no exposed native ground surface is present.

The records search indicated that a total of 154 previous studies have taken place within the 0.25-mile records search radius, between 1949 and 2016. Of these, 30 overlapped the Project Area, 40 were immediately adjacent to the Project Area, and the remaining 84 studies were outside of the Project Area but within the 0.25-mile radius. The results of the SCCIC records search also indicated that 271 previously-recorded resources are located within the 0.25-mile records search radius of the Project Area. Four of the built environment resources overlap the Proposed Project. The four that overlap include the Union, Raymond, Holly, and Fair Oaks corridors, Pasadena Civic Center District, Old Pasadena Historic District, and Alta San Rafael Association. No prehistoric or historic-age archaeological resources have been previously recorded within the Project Area.

**Figure 3.5-1 – Representative streetlight on Broadway, Glendale**



**SOURCE:** GPA Consulting, *Historic Resources Technical Report*, 2020.

## 3.5.6 Significance Thresholds and Methodology

### 3.5.3.1 Significance Thresholds

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Project would have a significant impact related to Cultural Resources if it would:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; and/or
- c) Disturb any human remains, including those interred outside of formal cemeteries.

### 3.5.3.2 Methodology

#### Historic Resources

The definition of historical resource for CEQA includes properties listed in or determined eligible for the California Register. Properties listed in a local register of historical resources or identified as historically significant in a historic resources survey (provided certain statutory criteria and requirements are satisfied) are also presumed to be a historical resource unless a preponderance of evidence demonstrates that the property is not historically or culturally significant. A lead agency may also treat a property as historical resource if it meets statutory requirements and substantial evidence supports the conclusion.<sup>20</sup>

The State CEQA Guidelines set the standard for determining the significance of impacts to historical resources in Title 14 California Code of Regulations Section 15064.5(b), which states:

*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.*

Title 14 California Code of Regulations Section 15064.5(b)(1) further clarifies “substantial adverse change” as follows:

*Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.*

---

<sup>20</sup> Title 14 California Code of Regulations §15064.5(a).

Title 14 California Code of Regulations Section 15064.5(b)(2) in turn explains that a historical resource is “materially impaired” when a project:

*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.*

Projects that may affect historical resources are considered mitigated to a level of less than significant if they are conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards).<sup>21</sup> The Standards were issued by the National Park Service and are accompanied by Guidelines for four types of treatments for historical resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most common treatment is rehabilitation; this is the treatment that applies to the Proposed Project. The definition of rehabilitation assumes that at least some alteration of the historic property will be needed in order to provide for an efficient contemporary use; however, these alterations must not damage or destroy materials, features, or finishes that are important in defining the property's historic character.

The 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 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 shall 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.

---

<sup>21</sup> Title 14 California Code of Regulations §15126.4(b).

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.

It is important to note that the Standards are not intended to be prescriptive, but instead provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, nor is it necessary to comply with every Standard to achieve compliance.

### Archaeological Resources

Archaeological sites are usually adversely affected only by physical destruction or damage. The CEQA and the CEQA Guidelines contain specific standards for determining the significance of impacts to archaeological sites (PRC Section 21083.2; 14 California Code Regulations Section 15064.5(c)). If the lead agency determines that the Project may have a significant effect on unique archaeological resources, the EIR must address those archaeological resources.<sup>22</sup> The analysis of archaeological resources was based on a cultural resource records search and literature review at the SCCIC, a SLF file search, windshield survey, and AB 52 consultation results.

### 3.5.4 Impact Analysis

**Impact 3.5-1)** Would the Proposed Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

#### Construction

**Less-Than-Significant Impact with Mitigation.** There would be no physical demolition or alteration of known and potential historical resources identified within the Project Area, with one exception, discussed below. It is anticipated that Proposed Project, including station platforms or dedicated lanes, would be constructed in the immediate or broader setting of historical

---

<sup>22</sup> California PRC, Section 21083.2(a).

resources, but not within the physical boundaries of the historical resource itself. Construction activities, including staging areas, would not physically affect nearby historical resources because the Proposed Project would not demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance. Construction-related noise and/or visual effects from activity and equipment in the vicinity of historical resources would not be permanent. The identified historical resources are not highly fragile building types, and so would not be susceptible to physical damage from the anticipated level of vibration associated with construction activities.

The Proposed Project passes through the boundaries of four historic districts in the City of Pasadena (Old Pasadena National Register of Historic District (NRHD), Pasadena Civic Center NRHD, Civic Center Financial NRHD, and Pasadena Playhouse NRHD).<sup>23</sup> Within Pasadena, the proposed alignment is mixed-flow in existing travel lanes. Station platform footprints in the City of Pasadena would be constructed on the sidewalk or on sidewalk extensions; five are situated at the edge of a historic district boundary, but none are wholly within a historic district boundary. Construction activities would not impact the four historic districts.

The exception to the preceding analyses is the potentially historic streetlights on Central Avenue and Broadway in the City of Glendale. Along Central Avenue and Broadway, the Proposed Project would be side or curb-running and proposed station platform footprints may result in the removal or relocation of potentially historic streetlights currently within the existing sidewalk. Conceptual engineering plans developed to support the Draft EIR show proposed station platform footprints that appear to conflict with the placement of approximately three potentially historic streetlights on Central Avenue and approximately three on Broadway. These include two streetlights at the northeast corner and one streetlight at the southwest corner of Central Avenue at Lexington Drive, one streetlight at the northwest corner of Broadway at Glendale Avenue, and two at the southeast corner of Broadway at Brand Boulevard. These six streetlights are similar in appearance to historic streetlights elsewhere on the street, although research suggests some may have been recently installed (or reinstalled) as early as 2007 or as recent as 2014, depending on the location. Regardless, at this time in the planning process, it is possible for the Proposed Project to interfere with potentially historic streetlights. Therefore, without mitigation, the Proposed Project would result in a potentially significant impact related to construction activities. Implementation of Mitigation Measure **CUL-1** would reduce this impact to a less than significant level by ensuring that rehabilitation adheres to the Secretary of the Interior's Standards for the Treatment of Historic Properties and by confirming that the Proposed Project will not cause a substantial adverse change in the significance of a historical resource.

---

<sup>23</sup> The Proposed Project would also pass immediately adjacent to, but not within, the boundaries of the Eagle Rock Commercial Historic District in the community of Eagle Rock, as either a center-running or curb-running alignment with one station platform immediately adjacent to the district boundaries. As a result, no physical alteration to any features of Eagle Rock Commercial Historic District would occur during construction or operation of the Proposed Project.

### Colorado Street (Route Option E2)

The Colorado Street route option would avoid all impacts to the potentially historic streetlights on Broadway; however, the Central Avenue streetlights would still potentially be affected by construction of the proposed station platform at Central Avenue and Lexington Drive. While fewer streetlights would be affected, without mitigation, the Proposed Project with the Colorado Street route option would result in a potentially significant impact related to construction activities. Implementation of Mitigation Measure **CUL-1** would reduce this impact to a less than significant level by ensuring that rehabilitation adheres to the Secretary of the Interior's Standards for the Treatment of Historic Properties and by confirming that the Proposed Project will not cause a substantial adverse change in the significance of a historical resource.

### SR-134 (Route Option E3)

The SR-134 route option would avoid all construction-related impacts to the Central Avenue and Broadway streetlights. Therefore, the Proposed Project with the SR-134 route option (Route Option E3) would result in no impact related to construction activities.

## Operations

**Less-Than-Significant Impact with Mitigation.** The Proposed Project would operate within the existing public ROW and would not directly affect historic resources. However, components of the Proposed Project would be located within the setting of known and potential historical resources. These components, such as stations, electric charging infrastructure, and signs, have the potential to visually affect historic resources.

Potential impacts to historical resources would primarily be limited to changes in setting at the location of station platforms, where shade structures and other vertical features would be constructed. Station platforms would generally be level with the sidewalk; the roadway curb may be raised slightly to provide "near level" boarding. Where feasible, a curb extension up to 12 feet would be provided to accommodate the station platform with minimal impact to the existing sidewalk area. Within the station platform footprint various vertical elements such as shelters (up to approximately 15 feet tall), seating, monument signs (up to approximately 20 feet tall), electronic displays, and bicycle racks may be located. Design integration of the station features into the sidewalk area would consider retaining or relocating existing vertical elements such as trees, signs, parking meters, and streetlights to minimize conflicts.

Station features (e.g., shelters, amenities, etc.) would be selected from a standard "kit of parts," which Metro is currently developing, and refined during the Preliminary Engineering phase of the Proposed Project. In the case of historical resources that are characterized by their relationship to the street, such as pedestrian oriented street fronts sited at or near the property line, consistency with Rehabilitation Standards can be achieved by maintaining physical access to the historical resource from the sidewalk and a visual connection between the historical resource and the street. The size, massing, and placement of station platform components would be carefully considered, especially proposed vertical structures that may obstruct views of important physical features or interrupt spatial relationships that characterize a historical

resource. Additionally, the materials, scale, and proportion of proposed station features would be differentiated from, yet compatible with, nearby historical resources. It is assumed the “kit of parts” would have a contemporary appearance that is generally consistent among the stations. This would visually differentiate the proposed new features from existing historical resources nearby. Compliance with Rehabilitation Standards would be unobtrusive as possible and allow the Proposed Project to retain the historic relationships between buildings and the landscape in the setting.

Rehabilitation Standard Nine advises “...related new construction will not destroy historic materials, features, and spatial relationships that characterize the [historic] property...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 [historic] property and its environment.” The only historical resources anticipated to be physically altered by the Proposed Project are the Central Avenue and Broadway streetlights (as described in the “Construction” section above). For all other historical resources, including individually significant properties, properties contributing to a historic district, and historic districts, it is assumed that changes would occur within the setting only. Where station platforms are proposed on the sidewalk or on sidewalk extensions directly in front of a historical resource, changes would occur in the immediate setting and in closer proximity to the historical resource. Where station platforms are proposed at the roadway center or median, changes would occur in the broader setting and would be further removed from the historical resource.

Rehabilitation Standard Ten advises “...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.” With the possible exception of the Central Avenue and Broadway streetlights, the Proposed Project would not construct station platforms within the boundaries of a historical resource or change the essential physical form or integrity of a historical resource. As such, consistency with Rehabilitation Standard Ten would be achieved for stations proposed adjacent to historical resources.

It is anticipated that station platforms would be designed in a manner that is consistent with the Rehabilitation Standards. However, a qualified architectural historian would be needed to confirm if the appearance and placement of new features would not materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance. Therefore, without mitigation, operation of Proposed Project could result in a potential significant impact to historic resources. Implementation of Mitigation Measure **CUL-1** would ensure this impact is reduced to less than significant.



### Mitigation Measures

**CUL-1:** A qualified architectural historian (individual who meets the Secretary of the Interior’s Professional Qualification Standards in Appendix A of 36 Code of Federal Regulations Part 61) shall review all project design documents related to historic streetlights and station platforms located immediately adjacent (i.e., on or directly in front of) known or potential historical resources identified in the Historical Resources Project Area to determine consistency with the rehabilitation treatment under the Secretary of the Interior’s Standards for the Treatment of Historic Properties to confirm the Proposed Project will not cause a substantial adverse change in the significance of a historical resource. The results of this review shall be provided to Metro in a memorandum prepared by the qualified architectural historian conducting the review, and Metro shall incorporate any design recommendations that would address potential substantial adverse changes in the significance of a historical resource into project design documents prior to the preparation of final construction documents.

### Significance of Impacts after Mitigation

Mitigation Measure **CUL-1** would ensure that the Proposed Project design would be consistent with Rehabilitation Standards. Therefore, the Proposed Project would result in a less-than-significant related to construction and operational activities.

**Impact 3.5.2** Would the Proposed Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

### Construction

**Less-Than-Significant Impact with Mitigation.** No archaeological resources were identified during the records search and literature review, SLF search, AB 52 consultation, or windshield survey. Surficial archaeological resources that may have existed have likely been displaced or destroyed as a result of previous development activities. The negative results and the developed nature of the Project Area does not, however, preclude the existence of undiscovered prehistoric or archaeological resources that may be encountered during construction.

Construction activities associated with the establishment of dedicated bus lanes would involve minimal ground disturbance and excavation. Excavation activities would be limited to 2 to 3 feet below ground surface, within soils previously impacted during initial road and sidewalk construction. Excavation associated with these vertical elements would be limited to two to three feet below ground surface, within soils previously impacted during initial road and sidewalk construction. Vertical element relocation activities, such as trees, signs, parking meters and streetlights, may extend to a depth of 12 feet below ground surface, below the currently disturbed soils. It is therefore possible that previously undiscovered and undocumented archaeological resources could be encountered during construction activities. Therefore, without mitigation, the Proposed Project would result in a potentially significant impact related to

construction activities. With implementation of Mitigation Measure **CUL-2**, this impact would be reduced to less than significant by ensuring that any archaeological resource discovered during construction is avoided or treated to the standards established by the Secretary of Interior.

### Operations

**No Impact.** The potential to disturb archaeological resources is only possible during construction activities. There is no potential for the surface-running BRT to encounter archaeological resources. Therefore, the Proposed Project would not result in a significant impact related to operational activities.

### Mitigation Measures

**CUL-2:** A Qualified Archeologist, meeting the Secretary of the Interior's Standards for professional archaeology, shall be retained for the Project and will remain on call during all ground-disturbing activities. The Qualified Archaeologist shall ensure that Worker Environmental Awareness Protection (WEAP) training, presented by a Qualified Archaeologist and Native American representative, is provided to all construction and managerial personnel involved with the Proposed Project. The WEAP training shall provide an overview of cultural (prehistoric and historic) and tribal cultural resources and outline regulatory requirements for the protection of cultural resources. The WEAP shall also cover the proper procedures in the event of an unanticipated cultural resource. The WEAP training can be in the form of a video or PowerPoint presentation. Printed literature (handouts) can accompany the training and can also be given to new workers and contractors to avoid the necessity of continuous training over the course of the Proposed Project.

If an inadvertent discovery of archaeological materials is made during construction activities, ground disturbances in the area of the find shall be halted and the Qualified Archaeologist shall be notified regarding the discovery. If prehistoric or potential tribal cultural resources are identified, the interested Native American participant(s) shall be notified.

The archaeologist, in consultation with Native American participant(s) and the lead agency, shall determine whether the resource is potentially significant as per CEQA (i.e., whether it is an historical resource, a unique archaeological resource, a unique paleontological resource, or tribal cultural resources). If avoidance is not feasible, a Qualified Archaeologist, in consultation with the lead agency, shall prepare and implement a detailed treatment plan. Treatment of unique archaeological resources shall follow the applicable requirements of PRC Section 21083.2. Treatment for most resources would consist of, but would not be limited to, in-field documentation, archival research, subsurface testing, and excavation. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and State repositories, libraries, and interested professionals.

### Significance of Impacts after Mitigation

Mitigation Measure **CUL-2** would mitigate inadvertent impacts to subsurface archaeological deposits during construction. Therefore, with mitigation, the Proposed Project would result in a less-than-significant impact related to construction activities.

#### **Impact 3.5.3** Would the Proposed Project disturb any human remains, including those interred outside of dedicated cemeteries?

### Construction

**Less-Than-Significant Impact.** The results of the record searches from the SCCIC and the NAHC indicated that no human remains have been recorded within the Project Area or within a 0.25-mile radius. The negative results and the developed nature of the Project Area does not, however, preclude the existence of buried human remains that may be encountered during construction. If human remains are encountered during construction, the procedures and protocols set forth in CEQA Guidelines Section 15064.5(e)(1); Health and Safety Code Section 7050.5, subdivision (c); and PRC Section 5097.98 (as amended by AB 2641) would be followed. According to these existing legal requirements, if human remains are discovered, all work within 100 feet of the find must be halted immediately and the Los Angeles County Coroner and Metro must be notified by the construction contractor. Should the Coroner determine that the remains are Native American, the Coroner has 24 hours to notify the NAHC, who shall in turn, notify the person they identify as the most likely descendent (MLD) of any human remains.. The NAHC would identify the MLD to be consulted by Metro regarding treatment and/or reburial of the remains. The MLD must be afforded an opportunity to inspect the find and make recommendations for treatment options. If an MLD cannot be identified, or the MLD fails to make a recommendation regarding the treatment of the remains within 48 hours after being granted access to the Project Area to examine the remains, the landowner, working with the Metro, must rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance. Compliance with these existing laws would ensure unanticipated discovery of human remains would be treated with appropriate deference and legal requirements. Therefore, the Proposed Project would result in a less-than-significant impact related to construction activities.

### Operations

**No Impact.** The potential to disturb human remains is only possible during construction activities. There is no potential for the surface-running BRT to encounter human remains. Therefore, the Proposed Project would not result in a significant impact related to operational activities.

### Mitigation Measures

No mitigation measures are required.

### Significance of Impacts after Mitigation

No impact.