

IV. Environmental Impact Analysis

D. Cultural and Tribal Cultural Resources

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts on cultural resources, including historic, archaeological, and tribal resources. This section is based in part on the *ArtCenter College of Design Master Plan, Historical Resources Technical Report* (Historical Resources Report) prepared by GPA Consulting (November 2016) included as Appendix E of this Draft EIR. The analysis of potential impacts to archaeological resources is based on records searches included as Appendix E of this Draft EIR, as well as a review of previous, existing, and proposed on-site conditions. Potential impacts to tribal cultural resources are based on coordination and consultation with California Native American tribes that are traditionally and culturally affiliated with the Hillside Campus and South Campus.

2. Environmental Setting

a. Regulatory Framework

(1) Historical Resources

Historical resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of historical resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by State and local governments. As described below, the principal federal, State, and local laws governing and influencing the preservation of historical resources of national, State, regional, and local significance include the National Historic Preservation Act of 1966 (National Register), as amended; the California Register of Historical Resources (California Register); the California Environmental Quality Act (CEQA); and Pasadena Historic Preservation Ordinance, all of which are summarized below.

(a) National Register of Historic Places

The National Register is "an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources

and to indicate what properties should be considered for protection from destruction or impairment.”¹ The National Register recognizes properties that are significant at the national, State, and/or local levels.

(i) Criteria

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

- A. It is associated with events that have made a significant contribution to the broad patterns of our history; or
- B. It is associated with the lives of persons significant in our past; or
- C. It embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. It yields, or may be likely to yield, information important in prehistory or history.²

(ii) Physical Integrity

In addition to meeting one or more of the above criteria, district sites, buildings, structures, and objects that are 50 years in age must also retain enough historic integrity to be eligible for listing. Historic integrity is defined as “the ability of a property to convey its significance” and “the authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period.”³ The National Park Service has identified seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. *Location* is the place where the historic property was constructed or the place where the historic event occurred. *Design* is the combination of elements that create the form, plan, space, structure, and style of a property. *Setting* is the physical environment of a historic property. *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. *Feeling* is a property’s expression of the aesthetic or historic sense of a particular period of

¹ 36 Code of Federal Regulations 60, Section 60.2.

² 36 Code of Federal Regulations 60, Section 60.4.

³ 36 Code of Federal Regulations 60, Section 60.4.

time. *Association* is the direct link between an important historic event or person and a historic property.⁴ To retain historic integrity, a property will always possess most of the aspects and depending upon its significance, retention of specific aspects of integrity may be paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when a property is significant.

(iii) Context

To be eligible for listing in the National Register, a property must also be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific... property or site is understood and its meaning... is made clear.”⁵ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

(b) California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by State and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.

The California Register consists of properties that are listed automatically, as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

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

⁴ U.S. Department of Interior, National Park Service. *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington, DC: National Park Service, 1995.

⁵ U.S. Department of Interior, National Park Service. *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington, DC: National Park Service, 1995.

the State Historical Resources Commission for inclusion on the California Register.

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria but are identified as 1–4 instead of A–D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, State, or national level, under one or more of the following four criteria:

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

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. 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. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.

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

1. The survey has been or will be included in the California Historical Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with the SOHP procedures and requirements;
3. The resource is evaluated and determined by the SOHP to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that

have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

(i) SOHP Survey Methodology

The evaluation instructions and classification system prescribed by the SOHP in its Instructions for Recording Historical Resources provide a three-digit evaluation code for use in classifying potential historical resources. In 2003, the codes were revised to address the California Register. The first digit indicates the general category of evaluation. The second digit is a letter code to indicate whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number, which is coded to describe some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

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

(c) California Environmental Quality Act

For purposes of CEQA, Public Resources Code Section 21084.1 defines a historical resource as:

[A] resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The fact that a resource is not listed in, or determined to be eligible for listing in,

the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be an historical resource.

CEQA Guidelines Section 15064.5(a)(3) also provides additional guidance on this subject:

[A]ny object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.

The CEQA Guidelines also 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.

CEQA Guidelines 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.

CEQA Guidelines Section 15064.5(b)(2) in turn explains that the significance of a historical resource is "materially impaired" when a project demolishes or materially alters in an adverse manner those physical characteristics of a historic resource that convey its historic significance and that justify its inclusion in or eligibility for the California Register, local register, or its identification in a historic resource survey. As such, the test for determining whether or not a proposed project will have a significant impact on an identified historical resource is whether or not it will materially impair the physical integrity of the

historical resource such that it would no longer be eligible for listing in the National or California Registers or other landmark programs such as the list of Pasadena Landmarks and Historic Monuments.

(d) Pasadena Historic Preservation Ordinance

The City of Pasadena's Historic Preservation Ordinance is codified in Chapter 17.62 of the Pasadena Zoning Code. It includes criteria for Landmarks, Historic Monuments, Historic Signs, Landmark Trees, and Landmark Districts. The criteria for designation of Historic Landmarks and Monuments are outlined in Section 17.62.040 as follows:

Historic Landmarks:

- a. It is associated with events that have made a significant contribution to the broad patterns of the history of the City, region, or State.
- b. It is associated with the lives of persons who are significant in the history of the City, region, or State.
- c. It embodies the distinctive characteristics of a type, architectural style, period, or method of construction, or represents the work of an architect, designer, engineer, or builder whose work is of significance to the City or, to the region or possesses artistic values of significance to the City or to the region.
- d. It has yielded, or may be likely to yield, information important locally in prehistory or history.

Historic Monuments:

- a. It is associated with events that have made a significant contribution to the broad patterns of the history of the region, state or nation.
- b. It is associated with the lives of persons who are significant in the history of the region, state or nation.
- c. It is exceptional in the embodiment of the distinctive characteristics of a historical resource property type, period, architectural style or method of construction, or that is an exceptional representation of the work of an architect, designer, engineer, or builder whose work is significant to the region, state or nation, or that possesses high artistic values that are of regional, state-wide or national significance.
- d. It has yielded, or may be likely to yield, information important in prehistory or history of the region, state or nation.

A historic monument designation may include significant public or semi-public interior spaces and features. In addition to these criteria, the City's ordinance states that the seven aspects of integrity shall be applied when determining Historic Monument eligibility (see Physical Integrity under Subsection 2.a.(1)(a)(ii), above).

Alteration, relocation, or demolition of designated or eligible historical resources must be reviewed by the City as part of an environmental study or as an application for a Certificate of Appropriateness (a discretionary permit).

(2) Archaeological Resources

State archaeological regulations affecting the Project include the statutes and guidelines contained in CEQA (Public Resources Code (PRC) Section 21083.2 and Section 21084.1) and the CEQA Guidelines (California Code of Regulations (CCR), Title 14, Section 15064.5). CEQA requires lead agencies to carefully consider the potential effects of a project on archaeological resources. Several agency publications, such as the series produced by the Governor's Office of Planning and Research (OPR), provide guidance regarding procedures to identify such resources, evaluate their importance, and estimate potential effects.

CEQA recognizes that archaeological resources are part of the environment, and a project that "may cause a substantial adverse change in the significance of a historical resource [including archaeological resources] is a project that may have a significant effect on the environment" (PRC Section 21084.1). For purposes of CEQA, a historical resource is any object, building, structure, site, area, place, record, or manuscript listed in or eligible for listing in the California Register (PRC Section 21084.1). Please refer to the previous discussion in this section regarding the California Register for a list of the criteria used to determine whether a resource is eligible for listing in the California Register and is, therefore, considered a historical resource under CEQA.

Archaeologists assess sites based on all four criteria but usually focus on the fourth criterion previously provided, which is whether the resource "[h]as yielded, or may be likely to yield, information important in prehistory or history." The CCR also provides that cultural resources of local significance are eligible for listing in the California Register (CCR, Title 14, Section 4852).

CEQA also considers project impacts to unique archaeological resources, defined as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Section 21083.2(g)).

In addition to having significance in accordance with the applicable criteria, resources must have integrity for the period of significance. The period of significance is the date or span of time within which notable events transpired at a site, or the period that notable individuals made their important contributions to a site. Integrity is the ability of that property to convey its significance.

With regard to human remains, CEQA Guidelines Section 15064.5 addresses consultation requirements if an initial study identifies the existence of, or the probable likelihood of Native American human remains within the project site. This section of the CEQA Guidelines as well as Health and Safety Code Section 7050.5 and Public Sections 5097.9 and 5097.98 also address treatment of human remains in the event of accidental discovery.

(3) Tribal Cultural Resources

On September 25, 2014, Governor Brown signed into law Assembly Bill 52 (AB 52), which 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 to require that an analysis of a project's impact on cultural resources include whether the project would impact "tribal cultural resources." As set forth in PRC Section 21074:

(a) *"Tribal cultural resources" are either of the following:*

(1) *Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*

(A) *Included or determined to be eligible for inclusion in the California Register of Historical Resources.*

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.⁶

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

For a project for which a notice of preparation for a draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. Section 21080.3.1(b) of the PRC defines “consultation” with a cross-reference to Government Code Section 65352.4, which applies when local governments consult with tribes on certain planning documents and states the following:

“consultation” means the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties’ cultural values and, where feasible, seeking agreement. Consultation between government agencies and Native American tribes shall be conducted in a way that is mutually respectful of each party’s sovereignty. Consultation shall also recognize the tribes’ potential needs for confidentiality with respect to places that have traditional tribal cultural significance.

⁶ Per subdivision (k) of PRC Section 5020.1, “local register of historical resources” means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

The provisions in Section 21080.3.2(a) of the PRC enumerate topics that may be addressed during consultation, including tribal cultural resources, the potential significance of project impacts, possible mitigation measures, and project alternatives.

Section 21084.3 of the PRC also states that public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. This section of the PRC also includes examples of mitigation measures that may be considered to avoid or minimize the significant adverse effects.

Consultation ends when either of the following occurs prior to the release of the environmental document:

1. Both parties agree to measures to avoid or mitigate a significant effect on a tribal cultural resource. Agreed upon mitigation measures shall be recommended for inclusion in the environmental document (PRC Section 21082.3(a)); or
2. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Sections 21080.3.2(b)(1)-(2) and 21080.3.1(b)(1)).

b. Background and Existing Conditions

(1) Ethnography

In ethnographic times, the City of Pasadena and much of the area surrounding the City was populated by the Tongva, later known as the Gabrielinos, which was derived from associations with the San Gabriel Mission. The Tongva are considered to have been one of the wealthiest and most populous tribes, second only to the Chumash who occupied territories to the north. The nearest Tongva community to the City of Pasadena is Ochuunca, located 2 miles east. Although there were no native people living in Pasadena due to the lack of fresh water sources, the place name for Pasadena is reported to have been Punitavjat.⁷

(2) Historical Resources

In 1845, the 13,319-acre Rancho Santa Anita was granted to Perfecto Hugo Reid by the Mexican governor Pio Pico. This grant contained a large portion of east Pasadena. In September 1875, the San Gabriel Valley Railroad Company pulled the first train into town, with the rail tracks running parallel to Raymond Blvd., bringing in new people and new

⁷ *City of Pasadena, Pasadena General Plan Certified EIR, August 2015, Section 5.4, Cultural Resources.*

opportunities for growth. One year later, the first street car line created easier access into the growing business district centered at Colorado and Fair Oaks. The name Pasadena, allegedly derived from Chippewa words for “crown of the valley,” was chosen in April 1875. The heart of this bustling center is known today as the Old Pasadena Historic District, and is listed on the National Register of Historic Places.⁸

In the 1880s, Pasadena’s population increased immensely due to the railroad rate wars and propaganda campaign that promoted health benefits of the climate in Southern California. This population increase led to an economic boom that flowed into 1887, adding a tourist-based economy to the expanding city. In the 1880s, mansions for prominent Pasadena citizens began to dominate the landscape. Road-widening projects along Colorado Street removed original store fronts, and Victorian-style architecture was replaced with Spanish Colonial Revival and Art Deco façades. The Valley Hunt Club launched the first Rose Bowl Parade in 1890 to boast of the valley’s climate. In addition, the Tournament of Roses Association was organized in 1895 to handle the growing popularity of this yearly event, and in 1902, football was added to the activities for an extra stimulus. In 1891, the Throop Polytechnic Institute, known popularly as CalTech, was founded at the corner of Chestnut and Raymond. Pasadena attracted creative, artistic people, some of whom favored a simpler design than Victorian-style architecture. The Craftsman bungalow design—a simple, garden-oriented house incorporating natural materials to draw a connection with the outdoors, including oak floors, exposed ceiling beams, brick or stone fireplaces, and simple exteriors—was developed in southern California out of the Arts and Crafts Movement. The automobile was central in shaping the built form of Pasadena and was thought to complement bungalow design. By 1915, Pasadena had one automobile per four residents, the highest ratio of any city in the world. The population of Pasadena and southern California grew dramatically in the 1920s as transcontinental automobile travel enabled mass migration from the east. Route 66, one of the first U.S.-numbered highways—extending from Chicago to Santa Monica—traversed Pasadena on Colorado and Foothill boulevards. In addition, State Route 110, known as Arroyo Seco Parkway, was completed in 1940 in order to provide a direct route from Los Angeles to Pasadena.⁹

Pasadena’s population increased from 81,000 to 106,000 during the 1940s, due in part to industrial expansion during the war and returning soldiers after the war. The automobile remained key in shaping the built form of Pasadena after World War II. Pasadena grew outward, including new residential neighborhoods north and east of downtown. In addition, Pasadena remained an important cultural center in the 1950s

⁸ *City of Pasadena, Pasadena General Plan Certified EIR, August 2015, Section 5.4, Cultural Resources.*

⁹ *City of Pasadena, Pasadena General Plan Certified EIR, August 2015, Section 5.4, Cultural Resources.*

through 1970s—for instance, through the work of the Pasadena Playhouse. The ArtCenter College of Design relocated into Pasadena in 1976.¹⁰

Today, the City of Pasadena is well known for its quality landmarks and historic buildings and neighborhoods. Within the City, there are approximately 1,011 buildings and 11 historic districts listed on the National Register. In addition, the City maintains a comprehensive list of historical resources in its Historic Resources Inventory, which includes approximately 7,440 resources.¹¹

As discussed in detail in Section II, Project Description of this Draft EIR, the Project Site includes two campuses referred to as the Hillside Campus and the South Campus. A description of the history and existing conditions for each of these campuses is provided below.

(a) Hillside Campus

The Hillside campus was established in 1976 at 1700 Lida Street in the Linda Vista neighborhood of western Pasadena. The 175-acre hillside site spans a ravine and contains one permanent main building (Ellwood Building); one utility and maintenance building (South Building); one structure (Sinclair Pavilion); one modular building (Annex Building); and two large surface parking lots (North Parking Lot and South Parking Lot). A description of these existing buildings is provided below.

- **Ellwood Building**—The Ellwood Building was the first building constructed on the Hillside Campus. Completed in 1976, the two-story International Style building was designed by prominent designer Craig Ellwood. The building has a rectangular plan and flat roof. It spans a ravine in the manner of a truss bridge. All materials on the exterior of the building are a uniform black. The east and west elevations of the building are identical with walls of divided tinted square glass panels with wide steel beams at the top and bottom. Walls on the 192-foot bridge portion of the building are recessed to form a walkway, the outside edge of which has massive alternating vertical/diagonal trusses. A simple steel railing spans the walkway just inside the truss framework. The building has multiple entrances at the narrow ends of the north and south elevations, at the center of the underside, ravine-facing elevations, and along western and eastern elevations.

¹⁰ *City of Pasadena, Pasadena General Plan Certified EIR, August 2015, Section 5.4, Cultural Resources.*

¹¹ *City of Pasadena, Pasadena General Plan Certified EIR, August 2015, Section 5.4, Cultural Resources.*

A 25,000-square-foot addition was constructed at the south elevation in 1989–1990. Jim Tyler, a former associate in Ellwood’s firm, designed the addition. The addition is the same width as the original building and is contiguous with the original building, connected by an inset hyphen. The addition is differentiated by a fenestration pattern of rectangular, instead of square, glass panels.

Ellwood was an architectural designer with a reputation for Modern buildings that were completed within tight budgets. The bridge form happened to be the most economical solution to the school’s hilly, canyon site; leveling the land would have required an expensive foundation. Despite Ellwood’s reputation for efficiency, inflation in the early 1970s caused the price of steel to rise. Cost-cutting measures were taken with the air conditioning units and roof system, which failed and had to be replaced five years after the building’s completion in 1976. The ArtCenter bridge building would be one of the final commissions of Craig Ellwood Associates; the firm closed in 1977 when Ellwood moved to Italy to become a painter.

- **Sinclair Pavilion**—The Sinclair Pavilion is an open structure constructed of concrete and completed in 2001. The structure has an asymmetrical butterfly roof supported by steel cross bracing and concrete pylons. Walls are glass and corrugated metal panels. The Sinclair Pavilion is sited on a promontory overlooking the eastern slope of the campus.
- **Annex Building**—The Annex Building is a two-story modular building set on a concrete foundation. The building has been located in the northeastern corner of the North Parking Lot since 2002.
- **South Building**—The South Building is a one-story, rectangular building with concrete masonry unit cladding. The building is utilitarian in function and style. It was constructed between 1978 and 1979.

In 2005, the Ellwood Building was designated a Pasadena Historic Monument under City of Pasadena Criterion C because it is representative of an important architectural style and is a major work of a master architect (Craig Ellwood). The nomination cites numerous awards the building received after it was initially constructed in 1976 and a special 25-year award by the Los Angeles chapter of the American Institute of Architects (AIA) in 2001. Although it is compatible with the original design, the addition, designed by Jim Tyler, was not included in the designation application because it was constructed in 1989.

No other buildings or structures on the Hillside Campus have been designated or determined eligible as historical resources. The SOHP recommends the evaluation of properties over 45 years of age as potential historical resources. None of the buildings or structures on the Hillside Campus are old enough to warrant evaluation and do not appear to have the potential to be of exceptional significance.

(b) South Campus

In 2004, ArtCenter established a second campus, referred to as the South Campus, at 950 and 988 South Raymond Avenue. The South Campus is located at the southern end of the City of Pasadena at the terminus of Arroyo Parkway and Glenarm Street. The urban area contains a mix of commercial and industrial buildings. The Metro Gold Line runs parallel to and between South Raymond Avenue and South Arroyo Parkway, through the South Campus. Between 2004 and 2015, the South Campus grew to include five parcels, on which there are two additional buildings (870 Building and 1111 Building) and one building used for parking and shop space (888 Building). A brief description of the existing buildings within the South Campus is provided below.

- 870 Building (located at 870 South Raymond Avenue) is a two-story, Modern building with boxy massing, a raised parapet, and flat roof constructed in 1979. The building has a double wall of cladding hovering around the core. Originally used as a post office sorting facility, the concrete building was altered in 2014 when ArtCenter converted it to classrooms, studio spaces, exhibition space, and a sculpture yard.
- 888 Building (located at 888 South Raymond Avenue) is a board-formed concrete, single-story building with a rooftop parking deck. A portion of the first floor of the building is utilized as “shop space” for students to work on projects that require spraying paints or adhesive materials. The building has a wide curved ramp on its northwestern side leading up to the upper parking deck. The building was originally constructed as loading dock structure for the Pasadena Refuse Disposal Department in 1951.¹²
- 950 Building (located at 950 South Raymond Avenue) is a three-story concrete building originally constructed in 1944 as an enclosure for the Southern California Cooperative Wind Tunnel. The tunnel was removed in 1955.¹³ The building was substantially altered as part of a comprehensive rehabilitation in 2004 to become the location of ArtCenter’s public programs, graduate art, and graduate media design practices programs. Alterations to the building included: reconfiguration of all entrances; additional exterior circulation staircases; rooftop additions; replacement of all windows and doors; and the addition of decorative features to multiple elevations.
- 1111 Building (located at 1111 South Arroyo Parkway) is a six-story glass office building, originally constructed in 1983. The first floor of the rectangular building

¹² *State of California, Department of Parks and Recreation Primary Record, “888 South Raymond Avenue,” 1996.*

¹³ *State of California, Department of Parks and Recreation Primary Record, “950 South Raymond Avenue,” 1996.*

is slightly inset. Above the first floor, the building is clad with glass. The corners of the building feature rounded windows. At the roofline is a flush black stucco cornice. The building is separated from the rest of the South Campus by the Metro Gold Line railroad tracks. An underground garage entrance is located at the west side of the parcel. The building became part of ArtCenter in 2015 and is used for classrooms, administrative offices, and a café.

As discussed in the Historical Resources Report, none of the buildings on the South Campus have been previously identified or evaluated as eligible for designation as historical resources. The 950 and 888 Buildings are more than 45 years old and were identified but not evaluated in an undated historical resource survey entered into the CHRIS database. However, information from the undated historical resource survey was not entered into the City of Pasadena's California Historical Resources Inventory Database.

The 950 Building was built in 1944. In 1996, the South Fair Oaks Specific Plan Inventory assigned the building a status of 6Z (Found Ineligible for National Register, California Register, or Local Designation through Survey Evaluation). In an undated historical resource survey, the building was assigned the status code 7R (Identified in Reconnaissance Level Survey: Not Evaluated). The building was substantially altered in 2004. Due to substantial alterations, the building does not appear to retain sufficient integrity to be eligible as a historical resource, regardless of any significance it may or may not possess. All but the massing and exterior wall material of the building was altered, diminishing any possible integrity of design, materials, workmanship, feeling, and association with a historic period. While the building was used as a supersonic wind tunnel, the essential physical features that contributed to this historic use have been removed, and the portions that remain are unable to convey an association with this function. Therefore, the 950 Building does not appear to be eligible as a historical resource.

The 888 Building was originally constructed in 1951 as a loading dock structure for the Pasadena Refuse Disposal Department. It is currently used as a parking deck and building for art production. In 1996, the South Fair Oaks Specific Plan Inventory assigned the building a status of 6Z, Found ineligible for National Register, California Register, or Local designation through survey evaluation. In an undated historical resource survey, the 888 Building was assigned a status code of 7R. According to historic aerial maps, the 888 Building appears to have been associated with an industrial facility to the north. This facility was demolished and replaced with a post office sorting center in 1979, diminishing any possible integrity of feeling or association with a historic industrial complex. The building does not appear to be architecturally significant. Therefore, the 888 Building does not appear to be eligible as a historical resource.

Accordingly, there are no designated or eligible historical resources on the South Campus portion of the Project Site.

(3) Archaeological Resources

Archaeology is the recovery and study of material evidence of human life and culture of past ages. On February 16, 2017, cultural/archaeological resources records searches were conducted by the South Central Coastal Information Center (SCCIC) for the Hillside Campus and South Campus. These records searches are included in Appendix E of this Draft EIR.

(a) Hillside Campus

The Hillside Campus and almost all of the surrounding area have not been previously surveyed for the presence of archaeological resources. As a result, the Hillside Campus and its vicinity may be sensitive for pre-historic or historic cultural resources.¹⁴

(b) South Campus

The archaeological sensitivity of the South Campus has not been studied. The ground surface at the South Campus appears to be completely obscured by structures or paving. While seven studies have been conducted throughout portions of the South Campus, ground visibility for all of those studies was also obscured by structures and pavement. Given the long history of urban development at the South Campus and its vicinity, there is the potential for buried resources within the footprint of the South Campus.¹⁵

(4) Tribal Cultural Resources

In compliance with the requirements of AB 52, the City provided formal notification of the Project on September 1, 2016. A letter was sent via certified mail to the Gabrieleño Band of Mission Indians—Kizh Nation (Kizh Gabrieleños). A record of the letter is included as Appendix E of this Draft EIR. The Kizh Gabrieleños responded to City's notification and requested consultation with the City on September 13, 2016. The City responded in writing on October 17, 2017. This consultation involved written communication, as documented in Appendix E of this Draft EIR.

¹⁴ *South Central Coastal Information Center, Records Search Results for the ArtCenter College of Design Master Plan Hillside Campus Project—Hillside Campus, February 16, 2017.*

¹⁵ *South Central Coastal Information Center, Records Search Results for the ArtCenter College of Design Master Plan South Campus Project—South Campus, February 16, 2017.*

3. Project Impacts

a. Methodology

The Historical Resources Report is based, in part, on a search of the California Historical Resources Inventory System (CHRIS) and the City of Pasadena's California Historical Resources Inventory Database. CHRIS is a database maintained by the SOHP that includes properties listed and determined eligible for listing in the National Register of Historic Places, listed and determined eligible for listing in the California Register of Historical Resources, California Registered Historical Landmarks, Points of Historical Interest, as well as properties that have been evaluated in historical resource surveys and other planning activities. In addition, to complete the Historical Resources Report, a field inspection of both campuses was conducted to ascertain the general condition and physical integrity of the buildings and structures. Digital photographs were taken during this field inspection, which was limited to the exterior of the buildings. The Hillside Campus, South Campus, and surrounding area were also researched at local libraries and archives to establish the general history and context, including a review of the relevant databases, newspapers, directories, books, and newspaper articles.

To address potential impacts associated with archaeological resources, formal records searches were conducted to assess the archaeological sensitivity of the Hillside Campus, South Campus, and surrounding vicinity.

Consultation with a California Native American Tribe was conducted to address potential impacts associated with tribal cultural resources.

b. Significance Thresholds

As discussed in detail in Appendix A of this Draft EIR, potential impacts with regard to paleontological resources were determined to be less than significant. With regard to historical resources, archaeological resources and tribal resources, based on Appendix G of the CEQA Guidelines, a Project would normally have a significant effect on the environment if the project would:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- Disturb any human remains, including those interred outside of dedicated cemeteries.

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
 - b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

As set forth in the regulatory framework included above, in accordance with CEQA, a substantial adverse change in the significance of a historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.¹⁶

c. Analysis of Project Impacts

Impact D-1: The Project would not cause a substantial adverse change in the significance of known historical resources as defined in Section 15064.5 of the CEQA Guidelines.

The Project has the potential to impact only one historical resource: the Ellwood Building on the Hillside Campus, which has been designated a Pasadena Historic Monument; the Hillside Campus is not located within a historic district or landmark district. As discussed in Section II, Project Description, of this Draft EIR, improvements within the Hillside Campus would include renovations and additions to existing buildings, additional parking, installation of photovoltaic (PV) solar cells and canopies over the existing surface parking stalls, and modifications to campus access. The Project does not propose any exterior modifications to the Ellwood Building. Therefore, an analysis of the Project for conformance with the Standards is not required. Furthermore, the City of Pasadena has reviewed the Project and determined that the proposed work would not require a Certificate of Appropriateness.

¹⁶ CEQA Guidelines Section 15064.5(b)(1).

Within the South Campus, the Project would include renovations to existing buildings, demolition of existing buildings and surface parking, construction of new buildings for student housing and student amenities, two-level subterranean parking structures below an existing building and new buildings, development of outdoor quad areas, and construction of a campus Cycleway and mobility hub. As there are no designated or eligible historical resources on the South Campus, the Project does not have the potential to impact historical resources within this portion of the Project Site. In addition, the Project does not have the potential to affect historical resources beyond the parcels comprising the campus due to the nature of the proposed work, which would not extend beyond the campus parcels. Similar to the Hillside Campus, the South Campus is not located within a historic district or landmark district.

As there are no designated or eligible historical resources within the South Campus, the analysis of Project impacts related to historical resources below is limited to a discussion of the Project as it applies to the Hillside Campus. The following paragraphs analyze the Project to determine if the proposed changes to the Hillside Campus would impact the integrity of the Ellwood Building, a historical resource.

- **Location**—Location is the place where the historic property was constructed or the place where the historic event occurred. The Project does not propose a change to the location of the Ellwood Building and would not affect integrity of location.
- **Design**—Design is the combination of elements that create the form, plan, space, structure, and style of a property. The Project does not propose a change to the design of the Ellwood Building and would not affect integrity of design.
- **Setting**—Setting is the physical environment of a historic property. It involves how, not just where, the property is situated and its relationship to surrounding features and open space. The physical features that constitute the setting of a historic property can be either natural or manmade.

The natural, tree-covered hillside setting of the Ellwood Building contrasts with the angular, dark building. The irregularity of the natural landscape permits the building to be both a starkly contrasting Modernist statement and a nearly invisible stealth box. The setting of the Ellwood Building is characterized by this varying relationship between the building and its hillside setting. One area where the building appears in stark contrast to its natural surroundings is the area where it spans a ravine. One of the primary views of the building is from the road running beneath the ravine. Another view of the building where it appears in stark contrast to its natural surroundings is from the east lawn, which slopes downward from the building, creating the impression of a long, elevated building rescinding into the woods. In other areas of the campus, the Ellwood Building is not visible. A line of trees on the elevated area between the South Lot and the

Ellwood Building blocks the majority of the views of the Ellwood Building. While shade trees on the South Lot would be removed to accommodate the installation of the PV cells and canopies, the Ellwood Building would remain partially visible from the South Lot; partial views of the rooftop equipment would remain visible from the South Lot. The North Lot is on a slightly lower plane than the Ellwood Building. The narrow, utilitarian north elevation of the Ellwood Building visible from the North Parking Lot does not communicate the elongated truss-like design of the building.

The Project proposes to install PV cells and canopies on the North and South Parking Lots. This installation would be visible from windows along the north elevation of the Ellwood Building. However, the PV cells and canopies would not affect the primary views of the building from the road in the ravine and from the east lawn.

The contrast of the angular and dark building with its natural setting will be preserved with the proposed Project. Thus, the Project would not diminish the integrity of setting.

- **Materials**—Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. A property must retain the key exterior materials dating from the period of its historic significance. The Project does not propose a change to the materials of the Ellwood Building. The PV cell and canopy installation on the South Lot would not physically contact the Ellwood Building and would not affect integrity of materials.
- **Workmanship**—Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. The Project does not propose a change that would affect the integrity of workmanship for the Ellwood Building.
- **Feeling**—Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character. The Project does not propose a change that would affect the integrity of feeling for the Ellwood Building.
- **Association**—Association is the direct link between an important historic event or person and a historic property. A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. The Ellwood Building will continue to be the main building of the ArtCenter Hillside Campus. The Project does not propose a change that would affect the integrity of association for the Ellwood Building.

Based on the above, the Ellwood Building would retain all aspects of integrity and would not be materially impaired through any work associated with the Project. In addition, although the Project would introduce PV cells canopies, a new visual element to the area, the PV cells would be completely separated from the historical resource, minimizing the potential for material impairment of the historical resource. Furthermore, there are no historical resources immediately adjacent to either the South Campus or Hillside Campus that would have the potential to be directly or indirectly impacted by the Project. Thus, the Project would have a less-than-significant impact on historical resources as defined by CEQA, and no mitigation is required or recommended.

Impact D-2: The Project may result in an unanticipated discovery of archaeological resources during construction, which would cause a potentially substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines or disturb any human remains, including those interred outside of dedicated cemeteries. Implementation of a mitigation measure would reduce potential impacts to less than significant levels.

As previously discussed, neither one of the campuses nor the surrounding areas have been surveyed for the presence of archaeological resources. The ground surface at both campuses is completely obscured by structures or paving, which makes it impossible for identifying the presence of archaeological resources without conducting invasive ground investigations (e.g., borings, trenching, etc.). As a result, both the Hillside Campus and South Campus and their vicinity may be sensitive for pre-historic or historic cultural resources. In the event that an archaeological resource were to be discovered during construction of the Project, particularly during excavation for the subterranean parking for the 988 and 888 Buildings at the South Campus, then work in the area would cease, and deposits would be treated in accordance with federal and State regulatory requirements. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98, as amended.

Furthermore, Section 15126.4(b)(3)(C) of the CEQA Guidelines suggests as mitigation that prior to any excavation activities, a plan be prepared and adopted to include provisions for the adequate recovery of scientifically consequential information from and about a historical resource of an archaeological nature. These studies would be deposited with the California Historical Resources Regional Information Center. If an artifact must be removed during excavation or testing, then curation would be an appropriate response. Section 15126.4(b)(3)(D) of the CEQA Guidelines states that if the lead agency determines that completed testing or studies have adequately recovered the scientifically

consequential information from and about the archaeological or historical resource, then data recovery would not be required, provided that the determination is documented in the EIR and studies are deposited with the California Historical Resources Regional Information Center.

Regarding guidance within the City, as established in the Pasadena General Plan, all ground-disturbing activities in the immediate area of a discovered cultural resource would be halted until the discovery has been evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria have been met, then the project would be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies and provide a comprehensive final report including site record to the City and the South Central Coastal Information Center at California State University, Fullerton. No further ground disturbance shall occur in the area of the discovery until Planning Department approves the report.

Without mitigation specifying procedures for the unanticipated discovery of cultural resources during construction, impacts related to archaeological resources and human remains that may be found present during construction of the Project would be considered potentially significant.

Impact D-3: The Project may potentially impact tribal cultural resources as defined in PRC Section 21074 during construction activities. Implementation of a mitigation measure would reduce potential impacts to less than significant levels.

In compliance with the requirements of AB 52, the City provided formal notification of the Project on September 2, 2016, to the Kizh Gabrieleños. Andrew Salas, Chairman of the Kizh Gabrieleños, responded in a letter dated September 13, 2016, that the Kizh Gabrieleños have concerns since the Project lies within their ancestral territories and requested that a certified Native American Monitor be present at the Hillside Campus or South Campus during any and all ground-disturbing activities (including, but not limited to, pavement removal, pot-holing, auguring, boring grading, excavation, and trenching). As discussed above, neither one of the campuses nor the surrounding areas have been surveyed for the presence of buried cultural resources. The ground surface at both campuses is completely obscured by structures or paving, which makes it impossible for identifying the presence of buried cultural resources without conducting invasive ground investigations (e.g., borings, trenching, etc.). As a result, both the Hillside Campus and South Campus and their vicinity may be sensitive for pre-historic or historic cultural resources. However, due to the limited amount of ground disturbance anticipated within the Hillside Campus, the discovery of tribal cultural resources is not anticipated to occur. At the South Campus, excavation for the subterranean parking for the 988 and 888 Buildings may have the potential to uncover tribal cultural resources. Accordingly,

Mitigation Measure D-2, which permits a Native American monitor to be present during these grading and excavation activities during construction, has been included below. Thus, in the event that tribal cultural resources are found, such resources would be treated in accordance with federal and State regulatory requirements, and tribal cultural resources would be turned over to the tribe.

4. Cumulative Impacts

As discussed above, there is only one historical resource located within the vicinity of the Project. The Ellwood Building, located within the Hillside Campus, would retain all aspects of integrity and would not be materially impaired through any work associated with the Project. In addition, there are no adjacent historical resources that would be impacted directly or indirectly by the Project. Thus, while past, present, and future cumulative development may have the potential to result in potential cumulative impacts to historical resources, the Project's contribution to potential significant impacts to historical resources would not be cumulatively considerable.

With regard to potential cumulative impacts related to archaeological resources, most of the development projects under the General Plan buildout are generally located within areas that have been disturbed and developed over time. In the event that archaeological resources are uncovered, each development project would be required to comply with applicable regulatory requirements and subject to applicable mitigation measures, such as that identified for the Project. Therefore, cumulative impacts to archaeological resources would be less than significant and would not be cumulatively considerable.

Similarly, any cumulative impacts to tribal cultural resources would be reduced by compliance with applicable regulatory requirements in the event of inadvertent discovery. In addition, each development project under the General Plan buildout would be required to comply with the consultation requirements of AB 52 to determine and mitigate any potential impacts to tribal cultural resources. Therefore, cumulative impacts to tribal cultural resources would be less than significant and would not be cumulatively considerable.

5. Mitigation Measures

Mitigation Measure D-1: Prior to any excavation activities, a plan shall be prepared and adopted by the Project Applicant to include provisions for the adequate recovery of scientifically consequential information should any archaeological resources be discovered during construction of the Project. Consistent with Mitigation Measure 4-1 in the Pasadena General Plan EIR, if cultural resources are

discovered during construction of the Project, all ground-disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the Project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies and provide a comprehensive final report, including site record to the City and the South Central Coastal Information Center at California State University Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report. In addition, any cultural resources found shall be treated in accordance with regulatory requirements. Grading and excavation may continue around the isolated area of the find so long as the activities do not impede or jeopardize the protection and preservation of any cultural resources.

Mitigation Measure D-2: During grading and excavation activities, a monitor meeting the satisfaction of the Gabrieleño Band of Mission Indians—Kizh Nation shall be allowed to be present on-site. Consistent with Mitigation Measure 4-1 in the Pasadena General Plan EIR, if Native American artifacts are found, all ground-disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the Project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies and provide a comprehensive final report, including site record to the City and the South Central Coastal Information Center at California State University, Fullerton. No further ground disturbance shall occur in the area of the discovery until Planning Department approves the report. Subsequently, the find shall be turned over to the tribe. In addition, any cultural resources found shall be treated in accordance with regulatory requirements. Grading and excavation may continue around the isolated area of the find so long as the activities do not impede or jeopardize the protection and preservation of any cultural resources as determined by the monitor.

6. Level of Significance After Mitigation

Implementation of Mitigation Measure D-1 would ensure that potential impacts associated with historical resources, archaeological resources, and human remains would be less than significant. In addition, implementation of Mitigation Measure D-2 would ensure that potential impacts associated with the potential for uncovering tribal resources during construction would be less than significant. Cumulative impacts associated with historic, archaeological, and tribal cultural resources would also be less than significant.