

3.4 CULTURAL RESOURCES

A Historic Resources Assessment was prepared for the proposed project in October 2008 by Architectural Preservation Planning Associates (see Appendix D) and an Archaeological Resources Assessment was prepared in October 2008 by EDAW, Inc. (see Appendix E). This section summarizes the results and conclusions presented in these reports.

3.4.1 ENVIRONMENTAL SETTING

PREHISTORIC OVERVIEW

The earliest evidence of human occupation in the Greater Los Angeles area dates to at least 9,000 years before present and is associated with a period known as the Millingstone Cultural Horizon (Wallace 1955, Warren 1968). Departing from the subsistence strategies of their nomadic big-game hunting predecessors, Millingstone populations established more permanent settlements. These settlements were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams and marshes where a variety of resources including seeds, fish, shellfish, small mammals, and birds were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating later than 5,000 years before present contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

Although many aspects of Millingstone culture persisted, by 3,500 years B.P. a number of socioeconomic changes occurred (Erlandson 1994; Wallace 1955; Warren 1968). Increased populations in the region necessitated the intensification of existing terrestrial and marine resources (Erlandson 1994). Evidence of shifts in settlement patterns has been noted at a variety of locations at this time and is seen by many researchers as reflecting increasingly territorial and sedentary populations. Archaeological evidence suggests that the margins of numerous rivers, marshes, and swamps within the Los Angeles River Drainage served as ideal locations for prehistoric settlement during this period. These well-watered areas contained a rich collection of resources and are likely to have been among the more heavily trafficked travel routes.

The Late Prehistoric period, spanning from approximately 1,500 years before present to the mission era, is the period associated with the florescence of the contemporary Native American group known as the Gabrielino (Wallace 1955). Coming ashore near Malibu Lagoon or Mugu Lagoon in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino Indians. Occupying the southern Channel Islands and adjacent mainland areas of Los Angeles and Orange counties, the Gabrielino are reported to have been second only to their Chumash neighbors in terms of population size, regional influence, and degree of sedentism (Bean and Smith 1978). The Gabrielino are estimated to have numbered around 5,000 in the pre-contact period (Kroeber 1925) and maps produced by early explorers indicate that at least 26 Gabrielino villages were within close proximity to known Los Angeles River courses, while an additional 18 villages were within reasonably close proximity to the river (Gumprecht 1999). Subsistence consisted of hunting, fishing, and gathering.

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The Gabrielino were virtually ignored between the time of Cabrillo's visit and the Spanish Period, which began in 1769 when Gaspar de Portola and a small Spanish contingent began their exploratory journey along the California coast from San Diego to Monterey. Missions were established in the years that followed the Portola expedition, the fourth being the *Mision San Gabriel Arcangel* founded in 1771 near the present-day city of Montebello. By the early 1800s, the majority of the surviving Gabrielino population had entered the mission system. Gabrielino inhabiting Los Angeles County were under the jurisdiction of either *Mision San Gabriel* or *Mision San Fernando*. Mission life offered the Indians security in a time when their traditional trade and political alliances were failing and epidemics and subsistence instabilities were increasing (Jackson 1999).

Alta California became a state when Mexico won its independence from Spain in 1821, and Los Angeles selected its first city council the following year. The authority of the California missions gradually declined, culminating with their secularization in 1834. Native Americans who had become dependent upon the missions were disenfranchised, and most *Gabrielino* neophytes either fled to the north or sought work as laborers for nearby private land owners. Former mission lands were quickly divided and granted to private citizens for use as agricultural and pastoral land (Reid 1939 [1852]).

As the possibility of a takeover of California by the United States loomed large in the 1840s, the Mexican government increased the number of land grants in an effort to keep the land in Mexican hands. More than 600 rancho grants were made between 1833 and 1846. Pasadena falls within parts of three former ranchos: Rancho San Rafael, deeded to Jose Maria Verdugo in 1784 and 1798; Rancho San Pasqual, deeded to Jaun Marine in 1835; and Rancho Santa Anita, received by Hugo Reid through his wife in 1841 (Lund 1999). By the mid-to-late 1800s, much of these lands were being used for agricultural purposes such as vineyards, orchards, and grazing – due in large part to the abundance of underground water (Lund 1999).

HISTORY OF THE PROJECT AREA

In 1839, a Scotsman, Hugo Reid acquired the Rancho Santa Anita, the land grant that adjoined Rancho San Pasqual on the east. In 1858, the rancho was divided and the western 1,300 acres were purchased by Leonard J. Rose. Rose named his ranch Sunny Slope, which, because of the availability of water, he planted with extensive vineyards, fruit and walnut orchards. In the late 1800s until the late 1890s, much land-use activity was occurring on and around the Sunny Slope Ranch. In 1887, Rose sold Sunny Slope to an English syndicate. The ranch was subsequently subdivided with the some of the northern portion divided into town lots adjacent to the Atchison, Topeka and Santa Fe rail line servicing Pasadena. The 1902 plat map of the Sunny Slope Estate depicts the ranch with the Lamanda Park subdivision and, to the south on the south side of Blanche Street, between Rose and Monte Vista Avenues, the 29-acre lot that was sold to Dr. James H. McBride in 1902 for his new sanitarium.

In 1904, 2 years after purchasing 29 acres of land of the Sunny Slope Ranch for \$27,000, McBride and 4 other doctors, all prominent in their field, (Norman Bridge, Henry Brainerd, Wallace Barlow, and Merritt Campbell) formed the Southern California Sanitarium for Nervous Disorders, which was incorporated on February 1, 1904. Dr. McBride's parcel was bounded by Blanche (now Del Mar Boulevard) on the north,

Monte Vista (now El Nido Avenue) on the east, and Rose Avenue (now San Gabriel Boulevard) on the west. Well-known architects Myron Hunt and Elmer Grey were hired to design the new facility. By 1917, the name of the hospital was changed to Las Encinas Hospital for Nervous Disorders.

Prior to 1904, the site was likely either grazing land or used for some undetermined agricultural use. By 1879, a water tank house (Building 4) had been constructed on the site to provide water for the Sunny Slope Ranch. Around that time—but possibly as late as the early 1900s—several farm utility buildings (Buildings 24A, 24B, 24C, and 24D and 26, 27, and 28), which are grouped on the southwest corner portion of the project site, were also constructed. The west portion of the barn (Building 27) appears to be the oldest of these buildings and it is most likely to have been constructed in the late nineteenth century. The other structures are more likely to be from 1904, or somewhat later, when the property became the Southern California Sanitarium.

When Dr. McBride hired the Pasadena architectural firm of Myron Hunt and Elmer Grey in the year he established the sanitarium, Pasadena was becoming one of the centers in this country of the Arts and Crafts movement. Hunt and Grey designed a 2-story structure with an “L” plan that was sited on the northeast quarter of the parcel with its entry facing north to unobstructed views of the San Gabriel Mountains (Building 1). The building was designed with wood-shingle cladding, wood balconies on the second floor, double-hung windows and eyebrow dormers. In 1905, Myron Hunt and Elmer Grey were selected again as the architects for the design of a large casino building (Building 7) and an eight-room cottage on the grounds of the sanitarium. The casino (later named the Gables) with a 165-foot frontage included a ballroom at one end and a gymnasium at the other; the two were joined by a bowling alley. The cottage that Hunt and Grey designed is likely the building that was named the Bungalow (Building 19). By 1910, the Lodge (Building 16)—located near the southeast corner of the property—the Gables (Building 7), a nurse’s cottage (non-extant), a men’s cottage (Building 25), the Bungalow (Building 19), and the Villa (Building 6) had been constructed.

In 1910, the Pasadena Star announced an addition to the sanitarium (Building 1), but no architects were identified. This construction is likely that of a large, 2-story addition to the west of the original Hunt and Grey building. An equally large wing with an elevated connecting walkway to the south of the 1910 addition was constructed in 1917. Both additions had similar features of wood shingle siding, hipped roofs, double-hung windows and knee-braced wood rail balconies. The west wing of the 1910 addition also included a 3-story square, hipped-roof tower on its west elevation. Later in 1929, the tower of the new wing was all but subsumed in another large addition extending the building’s facade further to the west.

Within the period 1905 to 1915, construction was most likely completed for the Doctor’s Cottage (Building 8), Briar (Building 22), Acacia (Building 2), and Las Flores (Building 3). Three other buildings that appear to have been constructed during this period are a women’s dormitory (Building 21), a greenhouse (Building 21A), and Cherokee (Building 5). Major development did not occur again at the sanitarium until the 1920s when a new administrative wing was added to the main building (Building 1) and 3 new cottages were constructed. The 3 cottages were constructed of Spanish influenced styles and all grouped around the Lodge on the southeast portion of the property. These cottages were Los Robles

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(demolished in the 1970s), Las Palmas (Building 15), and La Vista (Building 17). Also during the 1920s, most of the sleeping porches on the cottages had been enclosed and bathrooms added. Sleeping porches on the main building were also enclosed during that time.

Between 1930 and the 1950s large additions expanded the frontage of the main building (Building 1) with an enlarged kitchen on the east and a new administration wing on the west. Two doctor's cottages, the Engineer's Shop, Nurses Station, an unidentified shop building south of the men's dormitory, and Mariah (Building 14) were also built during this period. Additions were also made to expand La Vista (Building 17), Cherokee (Building 5), and the Doctor's Cottage (Building 8). By the 1950s, additions were made to some of the agricultural buildings as they were converted for maintenance, storage, and shop uses.

ARCHAEOLOGICAL RESOURCES SURVEY

Archival records research of the project area was conducted on February 21, 2008 at the South Central Coastal Information Center housed at California State University, Fullerton. The records search revealed that a total of 2 cultural resource investigations were previously conducted within a ½-mile radius of the project. One survey consisted of a cultural resource assessment for a cellular tower and one survey consisted of a historic property survey. Less than 10 percent of the ½-mile study radius has been previously surveyed and one of the current project sites has been previously surveyed. No prehistoric or historic archaeological sites have been previously recorded within a ½-mile radius of the project site or within the project site itself. The previously surveyed areas within ½-mile of the proposed project site are described in Table 3.4-1.

TABLE 3.4-1 CULTURAL RESOURCE INVESTIGATIONS WITHIN ½-MILE OF THE PROPOSED PROJECT SITE

Author	Report No.	Description	Date
Kyle, Carolyn	LA7201	Cultural Resource Assessment for Cingular Wireless Facility	2002
Love, Bruce	LA4300	Identification and Evaluation of Historic Properties San Pasqual Sewers Project Los Angeles	1988

The Native American Heritage Commission conducted a check of its Sacred Lands File on April 14, 2008. The check indicated that no previously documented sacred lands had been reported in the area. However, the Native American Heritage Commission indicated that the absence of specific information in the Sacred Lands File does not preclude the possibility of archaeological resources within the project site.

Additional historical research was conducted for this project at the Las Encinas Hospital to collect historic photographs, maps, ledgers, historical accounts, and newspaper clippings. Although the hospital does not maintain a formal archive, the staff does collect and preserve historical information related to the creation and continuing operations of the Las Encinas Hospital. Several very informative documents were obtained during the hospital visit, including a first-hand account of Margaret Farwell Smith, granddaughter of the second owner of Las Encinas Hospital, Dr. Stephen Smith II. Ms. Smith (2004)

grew up on the property and provided detailed memories of the operation of the hospital, as she remembers. Additional documents include an undated newspaper account of the recovery of a large metal tank, presumably a remnant of Rose's distilling activities in the late 1800s (Hubbard n.d.); an undated hospital newsletter which documents the replacement of the original water tank and on-site burial of the sanitarium's first work-horse; and a historical account by June Meader (1979), Director of Volunteer Services from 1979-1981.

An archaeological resources survey of the project site was conducted on March 11, 2008. Despite the poor ground visibility, 3 historic-era archaeological features and numerous isolated historic-era artifacts were observed during the survey.

HISTORIC RESOURCES SURVEY

The period of significance for Las Encinas Hospital is 1904 to 1929. It is the period that spans from the establishment of the facility and construction of its sanitarium to after the construction of the large addition to the original sanitarium building. During this period, most of the auxiliary buildings were constructed and much of the landscape was established. The facility functioned as an institution for health disorders, a function that continued throughout its period of significance. Changes to the property after 1929 are considered in this evaluation to be irrelevant to its significance because of the emphasis on the historic context theme of "Pasadena: Health, Tourist and Social Mecca" (O'Connor 1993).

Developments after the period of significance, between 1929 and the early 1950s, include substantial additions to the main building (Building 1), the Willows (Building 21 and 21A), and the Doctor's Cottage (Building 3), construction of 2 minor buildings on the southwest portion of the property and minor alterations to existing bungalows. In the 1970s, the Nurses Dormitory, the Los Robles cottage and a doctor's residence were demolished. Construction after 1970 included the Oaks Apartments complex (1979), and a 5,200-square-foot medical office building (1989). All of the additions and buildings constructed in the 1950s through 1980s are non-contributing elements.

Buildings on the Las Encinas Hospital property constructed during the period of significance reflect architectural styles that were prevalent in Pasadena and Southern California during the times in which they were constructed. Buildings that contribute to the property's significance exhibit character-defining features of the Arts and Crafts period and the later Spanish/Mission/English Revival period. All historic district contributors possess all or most of the following character-defining features of these styles:

Arts and Crafts (1904-1920): Wood-shingle or wood clapboard siding (or combination of both), grouped double-hung or casement windows, wood surrounds, gable or hip roof with exposed rafters, wood porches or balconies (main building), and eyebrow dormer vents.

Spanish/Mission Revival (1920-1925): Stucco cladding, flat roof with parapet (tile capped), grouped multi-light casement windows, and French doors.

English Tudor Revival (1929): Masonry exterior walls, steep-pitch hip roof, multi-light casement windows, French doors, porte-cochere, and wood balconies.

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All of the extant buildings on the Las Encinas Hospital property that were constructed for its operation as a sanitarium from 1904 to 1929, which have also retained integrity, contribute to the historic significance of the site. Additions to the main building and cottages and new buildings constructed after 1929 are non-contributing elements. In addition, the circa 1879 water tank house (Building 4) and the barn (Building 27) are contributing elements (although later additions to the barn are non-contributing). These 2 structures and 6 other agricultural buildings that have undocumented construction dates were evaluated according to National Register guidelines because of their apparent integral function with the sanitarium during the property's period-of-significance. Though there is no documentation on the specific uses of these buildings in the early days of the sanitarium, they were most likely used to meet the needs of the facility's kitchen, which obtained its meat and dairy products from the cows and chickens that were raised on the sanitarium property. The only documentation of their use is a Sanborn Map of Las Encinas dated February 1949 that indicates the buildings—probably converted to non-agricultural uses after 1930—by then were used as storage and maintenance shops. Of the 7 agricultural buildings on the site, the barn (Building 27) is the most distinctive, although the additions on its east elevation are of poor quality and in deteriorated condition. The other 6 buildings are less distinctive and they also have nonsignificant additions and/or are in an extremely deteriorated state.

Most important to the function of the sanitarium was the water supply. As a structure that was crucial to the operation of the physical plant of the sanitarium, the circa 1879 tank house (Building 4) also contributes to the significance of the site. This structure and another water pump (non-contributing) near the farm buildings provided the facility's sole source of water until at least the early 1980s.

Contributing elements that define the significance of the Las Encinas Hospital include 13 buildings, 1 structure, and 4 landscape features. Table 3.4-2 presents the major elements on the property that reflect its development from 1879 to 1929, their construction date(s), and status of each element as a contributor or a non-contributor in a potential nomination to the National Register of Historic Places. Buildings, structures, and landscape features constructed after 1929 that include the Oaks (Buildings 9 and 10), the medical office building (Building 31), the Nash House (Building 29), Mariah (Building 14), the Hobby Room (southeast of the Water Tank House), the Engineer's Shop, the front perimeter wall, the tennis court and the swimming pool are non-contributing elements because their construction was later than the period-of-significance for the property.

TABLE 3.4-2 CONTRIBUTORS/NON-CONTRIBUTORS TO ELIGIBLE NATIONAL REGISTER HISTORIC DISTRICT

Element	Bldg #	Construction Date	Status	Comments
Main Building	1	1904, 1910, 1917, 1929, 1949, 1951, c1955	Contributor	Only 1904, 1910, 1917, and 1929 construction is contributing; post 1929 construction is non-contributing
Bungalow	19	c1905	Contributor	Minor addition on south/east elevation
2810 Del Mar Residence	8	c1910	Non-contributor	Major alterations to north and south elevations, large rear addition
Villa	6	c1905	Contributor	Window replacements in some original openings
Gables	7	1905	Contributor	Porch enclosure on east elevation; minor addition on west elevation
Acacia	2	c1905	Contributor	Porches enclosed; replacement wood in casements in original openings
Las Flores	3	c1905	Contributor	Porches enclosed; minor addition on east elevation
Briar	22	c1905	Contributor	Porches enclosed including L-shape porch across front facade
Cherokee	5	c1915	Contributor	Large non-contributing addition to north elevation
Lodge	16	c1905	Contributor	Porches enclosed
La Vista	17	c1922	Contributor	North wing addition
Las Palmas	15	c1922	Contributor	Minor addition to west elevation
Willows (office)	21	c1920	Non-contributor	Substantial portion of building demolished; non-original windows
Willows (Meeting Room)	21A	c1910	Non-contributor	Minor building with several modifications
Water Tank House	4	c1879	Contributing	Minor addition to the north elevation of pump house
Men's Dormitory	25	c1905	Contributing	Minor addition to west elevation
Stables/Garage	26	c1910	Non-contributor	Major additions to south and east elevations
Pump House	28	c1910	Non-contributor	Deteriorated condition
Barn	27	c1880	Contributing	Only 1 ½-story structure on west end is contributing; all additions to east of it are non-contributing
Maintenance Buildings	24, 24A, 24b, 24c, 24d	c1910	Non-contributing	Deteriorated condition
Landscape Feature 1: Entry to site and original road configuration	N/A	c1929	Contributing	Paving not original and is non-contributing

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Element	Bldg #	Construction Date	Status	Comments
Landscape Feature 2: Palm trees and other mature trees at north/front of property	N/A	c1929	Contributing	
Landscape Feature 3: South Lawn	N/A	c1929	Contributing	Original spatial relationship of Main Building to Acacia, Las Flores, and Briar in c1929
Landscape Feature 4: Fern Grotto	N/A	c1929	Contributing	Grouping of mature trees pre 1904; paths and stone water channel c1929

Buildings in the Las Encinas historic district that are non-contributors because of construction after 1929 were evaluated for possible significance on an individual basis. The Willows (major construction obscures original 1930s building), the Engineers Cottage, the Utility Room, Nash House and the front perimeter wall were all constructed between 1953 and 1960. None of these buildings (or the wall) qualifies for individual designation under local, state or federal criteria. Buildings constructed after 1960 — the Oak Apartments, the medical office building, the residential building at the rear of 310 San Gabriel Boulevard, and the 2-story garage at the rear of 336 San Gabriel Boulevard, likewise do not meet criteria for individual designation.

Two of the historic landscape features are located on the northern boundary of the project site in front of the main building (Building 1). These include the palm trees and other large, mature trees, the lawn, and the driveway that leads to the main building (Building 1). The third historic landscape feature is the lawn located at the rear (south) of the main building. This lawn retains the original spatial relationship between the main building (Building 1), Acacia (Building 2), Las Flores (Building 3), and Briar (Building 22). The fourth historic landscape feature is the fern grotto located northeast of Briar (Building 22). This grouping of mature trees is thought to have been planted prior to 1904. Paths and a stone water channel were added around 1929.

3.4.2 REGULATORY SETTING

NATIONAL REGISTER OF HISTORIC PLACES

Enacted in 1966, the National Historic Preservation Act (NHPA) established the National Register of Historic Places (National Register) program under the Secretary of the Interior, authorized funding for state programs with provisions for pass-through funding and participation by local governments, created the Advisory Council on Historic Preservation, and provided for a review process for protecting cultural resources. The National Historic Preservation Act provides the legal framework for most state and local preservation laws.

The National Register program is maintained by the Keeper of the Register, within the National Park Service division. The National Register program also includes National Historic Landmarks, which is limited only to properties of significance to the nation. A building, district, site, structure or object is eligible for listing in the National Register if it possesses integrity of location, design, setting, materials, workmanship, feeling and association and meets at least one of the following criteria:

- 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 represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; or

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D. It has yielded, or may be likely to yield, information important in prehistory or history.

CALIFORNIA REGISTER OF HISTORIC RESOURCES

A cultural resource is considered “historically significant” under CEQA if the resource meets one or more of the criteria for listing on the California Register of Historic Resources (California Register), National Register, or local register. The California Register was designed to be used by state and local agencies, private groups, and citizens to identify existing cultural resources within the state and to indicate which of those resources should be protected, to the extent prudent and feasible, from substantial adverse change. The following criteria have been established for the California Register (Pub. Res. Code Section 5024.1; Title 14 CCR, Section 4852). A resource is considered significant if it:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the above criteria, historical resources eligible for listing in the California Register must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

CITY OF PASADENA

The Historic Preservation Ordinance in Article 6 of the Zoning Code is the primary body of local historic preservation laws. The revised ordinance, which was adopted by the City Council in 2002, establishes the authority for historic preservation and the composition and administrative requirements of the Historic Preservation Commission. It also includes criteria for designating historic resources and procedures for protecting significant historic resources.

An application for designation as a historic monument, landmark, historic sign, or landmark tree may be initiated by a property owner, a member of the City Council, a member of the Historic Preservation Commission, or by any interested person who resides in the City. Landmark districts are initiated by petition of a majority of property owners in a potential district. They are designated as a special zoning district and are processed at public hearings before the Historic Preservation Commission, the Planning Commission, and the City Council. The criteria for designation under Chapter 17.62 are the same as the National Register.

The Certificate of Appropriateness process is a process whereby alterations, new construction, or demolitions affecting properties that are designated or determined eligible for designation are reviewed for compliance with the Secretary of Interior Standards.

3.4.3 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

As part of the Initial Study (see Appendix A), it was determined that the proposed project would not directly or indirectly destroy a unique paleontological resource or site, a unique geologic feature, or human remains interred outside of a formal cemetery. Accordingly, these issues are not further analyzed in the EIR.

Pursuant to the CEQA Guidelines, the proposed project would have a significant effect on cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource (Cal. Code Regs., Title 14, Section 15064.5); or
- Cause a substantial adverse change in the significance of an archaeological resource (Cal. Code Regs., Title 14, Section 15064.5).

IMPACT ANALYSIS

CUL-1: *The proposed project would cause a substantial adverse change in the significance of a historical resource.*

The proposed project would provide additional medical offices, a new psychiatric hospital, and an expansion of senior living services. In anticipation of the needs of the City of Pasadena and surrounding communities, the 2007 Master Development Plan seeks to augment these services by increasing assisted living beds from the current 9 beds to a total of 81 beds and increasing independent living units from 85 existing to 245 total units. The proposed project would provide expanded medical (psychiatric) office space from the existing 15 units (14,174 square feet) to 31 total office units (an additional 45,407 square feet). In addition, a new psychiatric hospital would be constructed to consolidate psychiatric patient care in a single, secure facility affording greater security to the neighborhood and modern facilities for staff and patient care. The new psychiatric hospital would accommodate 120 total beds, increasing the number of beds by an additional 30 beds. The new psychiatric hospital would also consolidate adolescent care facilities. Residential Treatment programs and Chemical Dependency would be consolidated from the 68 existing beds located in six different buildings to accommodate 38 beds in a single facility (Gables Building 7), a reduction of 30 beds. Adolescent psychiatry would be consolidated into a single building accommodating 28 beds in the central portion of the campus south of the existing hospital building.

Within the portion of the project site that is defined as an eligible National Register district—the majority of the buildings, structures and landscape features that make it eligible for listing in the National Register

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would be preserved. However, implementation of the proposed project would require demolition of approximately 20 existing buildings. This includes four buildings that contribute to the eligible National Register district: the Lodge (Building 16), Las Palmas (Building 15), men's dormitory (Building 25), and the barn (Building 27). According to CEQA, demolition of a building, structure or site that is listed or designated or is eligible for listing or designation under local, state or federal jurisdictions constitutes a significant environmental impact. Implementation of mitigation measures CUL-A through CUL-E would be required. However, even with implementation of mitigation, the impact to historic structures would remain significant and unavoidable. Relocation of the water tank house at 310 South San Gabriel—a structure that is eligible for designation as a local landmark—would also create a significant impact because the structure would be removed from its historic context. Implementation of mitigation measure CUL-C would be required to reduce the impact to this structure to a less than significant level.

CEQA states that a project that complies with the Secretary of the Interior's Standards "shall be considered as mitigated to a level of less than a significant impact on the historical resource." The proposed Las Encinas Master Plan specifies the adaptive use of most of the contributing historic resources on the site. A major portion of the main building (Building 1) would be rehabilitated for use as administrative offices, assisted living units, a museum, and support services for the independent living unit. All of the contributing cottages (Building 3, 5, 6, 7, 17, 19, and 22) would be rehabilitated for new or existing uses. Most of the alterations would occur on the interior of these buildings. To ensure that the alterations meet the requirements of CEQA, all alterations would be constructed in accordance with the Secretary of Interior's Standards (see mitigation measures CUL-D). With implementation of mitigation, the physical impact to historic structures would be reduced to a less than significant level.

New construction on the project site is extensive with over 300,000 square feet added to the Las Encinas facility. Most of the new buildings would be located on the western portion of the site off of San Gabriel Boulevard or on the southern one-third of the property where they are set apart from most of the contributing historic resources. Thirty-two 1- and 2-story independent living units are proposed to be constructed. Twenty-eight of these are sited on the western portion of the property facing San Gabriel Boulevard and are either outside the boundaries of the National Register-eligible historic district or on its western edge. The remaining 4 new buildings are cottages that are interspersed among three of the contributing historic resources in the area south of the main building and the lawn. All 4 are 1-story, detached living units; they do not require demolition or partial demolition of a historic resource. New office buildings are proposed on the northwest portion of the property in the vicinity of three of the National Register-eligible historic district's contributing historic resources. A 2-story medical office building would replace an existing 1-story medical office building to the west of this grouping and a one-story medical office building would be sited between the Bungalow (Building 19) and Villa (Building 6). These new buildings would be separated physically from the historic resources and construction would not involve demolition or partial demolition of any significant historic features. However, the proposed project would place new buildings within the eligible National Register district and potentially alter the character of the district. This impact would be significant.

Both the Secretary of the Interior's Standards and the City of Pasadena design guidelines require that new construction be compatible with surrounding buildings and structures. Because the project site is a

historically significant resource eligible for listing in the California and National Registers, the proposed new construction in the Las Encinas project plan must be compatible with the historic structures on the site in terms of massing, size, scale, and architectural features. Thus, the design of the new construction, especially the larger buildings within the National Register-eligible historic district, would borrow the concept of the massing and character-defining features of the main building (Building 1). Further, all new construction would incorporate building materials that are similar to the National Register-eligible historic district's contributing buildings, specifically such that new materials would maintain the residential treatment and spa feeling of the district. Compliance with the Secretary of Interior's Standards (see mitigation measure CUL-D) would ensure that new construction does not detract for or alter the significance of the National Register-eligible historic district. The impact would be less than significant.

The contributing landscape features on the project site would primarily be preserved as part of the proposed project. Construction of one new 1-story senior living cottage (Building 36) on the south lawn (Landscape Feature 3) would not have a significant adverse impact on this feature. Similarly, although some modifications are required to the interior site roadways, none of those changes would significantly impact the original historic alignment of the circular drive in front of the main building (Building 1), which is Landscape Feature 1, or the landscaped area directly to the north of the main building, which is Landscape Feature 2. These changes would be considered less than significant because they would not affect the status of this landscape feature as a contributor to the National Register-eligible historic district. Similarly, no changes are proposed that would impact Landscape Feature 4, or the fern grotto northeast of Briar (Building 22). All changes to these landscape features would be subject to design review and compliance with the Secretary of the Interior's Standards.

CUL-2: *The proposed project would cause a substantial adverse change in the significance of an archaeological resource.*

Historical information suggestive of buried archaeological deposits was obtained as a result of historical research conducted for the proposed project. The most likely types of archaeological resources to be present on the project site are historic-era resources related to the site's use during the ranch period (1861-1887) and those associated with the historic period of use as the sanitarium (1904-ca. 1955). Newspaper articles and memoirs indicate the potential for buried archaeological resources, such as remnants of the Sunny Slope Ranch distillery and trash disposed of on-site during the early years of the sanitarium. The presence of prehistoric resources is also possible, although no surface evidence of such was identified during the survey. Nonetheless, historic research indicates the close proximity of the proposed project site to two known ethnohistoric Gabrielino villages and information indicating Gabrielino Indians from the nearby village of *Akuuronga*, worked on the ranch during historic times. Further, the lack of development on the Las Encinas grounds indicates that should a subsurface component exist, it is likely to retain sufficient integrity to yield data which is historically significant under CEQA.

In addition, 3 historic-era archaeological features and several isolated artifacts were recorded during the site survey. The features were present on the project site as early as 1930. The isolated artifacts date from approximately 1840 to 1960. Isolated historic-era artifacts were observed in 4 locations within the project site. The isolated artifacts range in date from the 1840s to the 1960s. Some of the artifacts were

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observed in an animal burrow, which is suggestive of a subsurface archaeological deposit.

Based on the historical record and the archaeological survey, the proposed project site is known to contain archaeological resources that are likely to yield information important to the history or prehistory of California (California Register Criterion 4). Specifically, there are 3 areas within the project site that are considered highly sensitive for the probability to yield significant historical resources. According to CEQA Guidelines Section 15064.5(a)(4), “the fact that a resource is not listed in, or determined to be eligible for listing in the California Register...does not preclude a lead agency from determining that the resource may be an historical resource.” Based on the information provided in Phase I Archaeological Resources Assessment, the lead agency (City of Pasadena) has elected to assume, without prior testing or evaluation of the eligibility of the archaeological resources identified, that the archaeological site(s) present in within the project site is “historically significant.”

The proposed project involves building construction, including subsurface excavation and grading, in portions of the project site that likely contain significant historic resources. Destruction or damage to these resources during construction would constitute a significant impact. Mitigation measures CUL-F through CUL-H are required to reduce the level of impact to less than significant by recovering significant archaeological resources from the project site prior to the start of construction activities.

3.4.4 MITIGATION MEASURES

CUL-A The applicant shall prepare and submit to the California Office of Historic Preservation a nomination application for listing the Las Encinas Sanitarium/Hospital in the National Register of Historic Places. Preparation and submittal shall be completed within 2 years of approval of the 2007 Master Development Plan.

CUL-B The applicant shall complete black-and-white archival-level photo-documentation of all buildings constructed between 1910 and 1929 (Buildings 21, 21A, 26, 28, 24A, 24B, 24C, and 24D) defined as non-contributors and proposed for demolition. The photo-documentation shall be completed prior to issuance of demolition permits for the project. Photo-documentation shall be submitted to the City of Pasadena Design and Historic Preservation Section and the Pasadena Public Library.

CUL-C The windmill water tank house located at 310 S. San Gabriel Boulevard shall be preserved either in its current location, or moved to another location on the project site or moved to a location off of the project site. If it is moved off site, the applicant shall submit HABS photographic documentation of the structure prior to moving the structure. HABS documentation shall be submitted to the City of Pasadena Design and Historic Preservation Section and the Pasadena Public Library. Rehabilitation shall comply with the Secretary of Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.

CUL-D Rehabilitation, additions and new construction pursuant to the Las Encinas Hospital 2007 Master Development Plan that is located in the National Register-eligible Las Encinas Sanitarium historic district shall comply with the Secretary of the Interior’s Standards and

Guidelines for Rehabilitating Historic Buildings. Prior to the issuance of a demolition permit, the applicant shall hire a qualified historic preservation consultant or restoration architect to ensure compliance with the Secretary of the Interior's Standards.

CUL-E The applicant shall submit a landmark designation application for the oak tree and the water tank house at 310 South San Gabriel (Building 13A) reasonably concurrent with the Design Commission submittal for Phase 1 or within 2 years of the adoption of the 2007 Master Development Plan, whichever comes first.

CUL-F A Research Design and Data Recovery Plan (Plan) for Areas 1, 2 and 6 shall be prepared by a Registered Professional Archaeologist and approved by the Planner Manager (or designee) prior to the issuance of a demolition permit. The Plan shall include 2 parts: a testing program and a data recovery program. The testing program shall be directed at determining the spatial distribution of historical resources to identify the extent of anticipated project-related impacts. The results of the testing program shall be documented in a technical report. If the testing program indicates the proposed project would not impact historical resources, the data recovery program is not required.

If the testing program indicates historical resources would be impacted by the proposed project, the technical report documenting the results shall be accompanied by a letter addressed to the City of Pasadena, indicating whether the Plan adequately addresses the resource-types encountered during the testing program. If resource-types not addressed in the Plan were encountered during testing, the Plan shall be revised accordingly prior to the commencement of the data recovery program. The data recovery program shall be aimed at the recovery of scientifically consequential information contained in the historical resources. The results of the data recovery program shall be documented in an Archaeological Data Recovery Report. The preparation of the Plan and the testing and data recovery programs shall be carried out by a qualified Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61) with experience pertaining to the history and prehistory of the Los Angeles area.

CUL-G All ground-disturbing activities associated with the proposed project (aside from any areas cleared by the Principal Archaeologist as a result of the testing and data recovery) shall be monitored by a qualified archaeological monitor. Prior to the issuance of a demolition permit, an Archaeological Monitoring and Discovery Plan shall be prepared outlining archaeological monitoring procedures and appropriate treatment of discoveries, should any be made. Archaeological monitors shall be under the direct supervision of a Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61). Ground-disturbing activities to be monitored include, but are not limited to, the demolition of buildings and structures, grading, trenching, utilities relocations and installations, the construction of fencing, and tree removal and plantings.

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CUL-H Unique archaeological materials (as that term is defined in CEQA, Public Resources Code Section 21083.2(g)) recovered during the investigation and archaeological monitoring shall be curated for posterity and access by future researchers at an accredited curational facility. A curation agreement shall be executed prior to the issuance of a demolition permit.

3.4.5 SIGNIFICANCE AFTER MITIGATION

Even with implementation of mitigation measures, the proposed project would involve demolition of 4 structures that contribute to the eligible National Register district located with the project site. This impact would remain significant and unavoidable. Impacts to archaeological resources would be mitigated to a less than significant level through implementation of data recovery.