

IV. Environmental Impact Analysis

E.1 Cultural Resources—Historic Resources

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts with regard to historic resources. The analysis is based on the *100 West Walnut Planned Development Historic Resources Technical Report* (Historic Resources Report) prepared by Historic Resources Group (April 2014), which is included in Appendix C of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

Historic resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of historic 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 and programs governing and influencing the preservation of historic resources of national, State, regional, and local significance include: the National Register of Historic Places (National Register), the California Environmental Quality Act (CEQA), the California Register of Historical Resources (California Register), and the Pasadena Zoning Code (Title 17 of the Pasadena Municipal Code), all of which are summarized below. As discussed below, in order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

(1) Federal

(a) National Register of Historic Places

The National Register is an authoritative guide to be used by federal, State, and local governments, as well as 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 Park Service administers the National Register program. Listing in the National Register assists in the preservation of historic properties in several ways, including:

- Recognition that a property is of significance to the nation, State, or community;
- Consideration in the planning for federal or federally-assisted projects;
- Eligibility for federal tax benefits; and
- Qualification for federal assistance for historic preservation, when funds are available.

To be eligible for listing and/or be listed in the National Register, a resource must possess significance in American history and culture, architecture, or archaeology. Listing in the National Register is primarily honorary and does not in and of itself provide protection of a historic resource. The primary effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive federal funding, a clearance process must be completed in accordance with Section 106 of the National Historic Preservation Act. Furthermore, State and local regulations may apply to properties listed in the National Register.

(i) Criteria

The criteria for listing in the National Register follow established guidelines for determining the significance of properties. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that:

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

¹ 36CFR60, Section 60.2.

- D. Have yielded, or may be likely to yield, information important in prehistory or history.²

In addition to meeting any or all of the criteria listed above, properties nominated must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. Historic integrity is the ability of a property to convey its significance and is defined as 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 defines seven aspects of integrity as follows:

- *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.
- *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.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- *Feeling* is a property’s expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.⁴

Certain types of properties are not usually considered for listing in the National Register, including religious properties, moved properties, reconstructed properties, commemorative properties, and properties that are less than 50 years old. However, these properties can be eligible for listing if they meet special requirements, referred to as criteria considerations, in addition to meeting the regular requirements described above (i.e., being eligible under one or more of the four criteria and possessing integrity). Specifically, under

² 36CFR60, Section 60.3.

³ *National Register Bulletin #16A: How to Complete the National Register Registration Form.* Washington DC: National Park Service, U.S. Department of the Interior, 1997, (3).

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

criteria consideration “g,” properties that are less than 50 years old may be listed in the National Register of Historic Places only if they are of “exceptional importance.”⁵

(ii) Historic Districts

Standard preservation practice evaluates collections of buildings from similar time periods and historic contexts as historic districts. The National Park Service defines a historic district as “a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”⁶ A historic district derives its significance as a single unified entity.

According to the National Park Service, “a district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district’s historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.” Some examples of districts include business districts, college campuses, large estates, farms, industrial complexes, residential areas and rural villages.⁷

Resources that have been found to contribute to the historic identity of a district are referred to as district contributors. Properties located within the district boundaries that do not contribute to its significance are identified as non-contributors.

(2) State

(a) California Register of Historical Resources

The California Register is an authoritative guide used by State and local agencies, as well as private groups and citizens, to identify the State’s historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.⁸ The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register includes the following:

⁵ *National Register Bulletin #22: Guidelines for Evaluating Properties That Have Achieved Significance Over the Past Fifty Years.* Washington DC: National Park Service, U.S. Department of the Interior.

⁶ *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation.* Washington DC: National Park Service, U.S. Department of the Interior, 1997.

⁷ *Ibid.*

⁸ *California Public Resources Code, Section 5023.1(a).*

- California properties formally determined eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory), the National Register of Historic Places.
- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation (OHP) reviews eligibility for the California Register in accordance with procedures adopted by the State Historical Resources Commission.
- Points of historical interest which have been reviewed by the OHP and recommended for listing by the State Historical Resources Commission for inclusion in the California Register in accordance with criteria adopted by the State Historical Resources Commission.⁹

Other resources that may be nominated for listing in the California Register include:

- Individual historical resources.
- Historic resources contributing to the significance of a historic district.
- Historic resources identified as significant in historic resources surveys, if the survey meets the criteria listed in Section 2.a.1.a on page IV.E.1-1.
- Historic resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria.
- Local landmarks or historic properties designated under any municipal or county ordinance.¹⁰

The criteria for eligibility for listing in the California Register and definition of historic significance are based upon the National Register standards described in Section 2.a.1.a on page IV.E.1-1. Similar to the National Register criteria, the OHP has established a “special (criteria) consideration” for resources that have achieved significance within the last fifty years:¹¹

⁹ *California Public Resources Code, Section 5024.1(d).*

¹⁰ *California Public Resources Code, Section 5023.1(e).*

¹¹ *California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register). California Office of Historic Preservation Technical Assistance Series #6: 1.*

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.

(b) California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires that environmental protection be given significant consideration in the decision-making process. Historic resources are included under environmental protection. Thus, any project or action which is determined to constitute a substantial adverse change on a historic resource is considered to have a significant effect on the environment. For the purposes of CEQA, the term “historical resource” includes the following:

- (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register.
- (2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code, or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource is 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 fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources, or not identified in a historical resources survey does not preclude a lead agency from determining that the resource may be a historical resource.

A project that results in an effect that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment. Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate

surroundings such that the significance of the historical resource would be materially impaired. Pursuant to Section 15064.5(b) of the CEQA Guidelines, the significance of a historical resource is materially impaired when a project:

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

(3) Local

(a) Pasadena Designation Programs

Pursuant to Chapter 17.62 of the Pasadena Zoning Code, the City of Pasadena has established a historic preservation program in order to promote “the identification, evaluation, rehabilitation, adaptive use, and restoration of historic structures.” The criteria for the designation of historic monuments, landmarks, historic signs, landmark trees, or landmark districts are applied “according to applicable National Register of Historic Places Bulletins for evaluating historic properties.” These criteria are further discussed below.

(i) Historic Monuments

A historic monument designation may include significant public or semi-public interior spaces and features. A historic monument includes all historic resources previously designated as historic treasures prior to adoption of Chapter 17.62 of the Zoning Code, historic resources that are listed in the National Register at the State-wide or federal level of significance (including National Historic Landmarks), and any historic resource that is significant at a regional, State, or federal level, and is an exemplary representation of a particular type of historic resource, and meets one or more of the following criteria:

- a) Is associated with events that have made a significant contribution to the broad patterns of the history of the region, State, or nation.
- b) Is associated with the lives of persons who are significant in the history of the region, State, or nation.
- c) Is exceptional in the embodiment of the distinctive characteristics of a historic 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) Has yielded, or may be likely to yield, information important in prehistory or history of the region, State, or nation.

(ii) Landmarks

A landmark may be the best representation in the City of a type of historic resource, or it may be one of several historic resources in the City that have common architectural attributes that represent a particular type of historic resource. A landmark includes all properties previously designated as landmarks prior to adoption of Chapter 17.62 of the Zoning Code, and any historic resource that is of a local level of significance and meets one or more of the following criteria:

- a) Is associated with events that have made a significant contribution to the broad patterns of the history of the City, region, or State.
- b) Is associated with the lives of persons who are significant in the history of the City, region, or State.
- c) 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) Has yielded, or may be likely to yield, information important locally in prehistory or history.

(iii) Historic Signs

Historic signs include all signs in the sign inventory prior to adoption of Chapter 17.62 of the Zoning Code and any sign subsequently designated historically

significant by the City's Historic Preservation Commission that possesses high artistic values. A historic sign must meet one or more of the following criteria:

- a) The sign is exemplary of technology, craftsmanship or design of the period when it was constructed, uses historic sign materials and means of illumination, and is not significantly altered from its historic period. Historic sign materials must include metal or wood facings, or paint directly on the façade of a building. Historic means the illumination must include incandescent light fixtures or neon tubing on the exterior of the sign. If the sign has been altered, it must be restorable to its historic function and appearance.
- b) The sign is integrated with the architecture of the building.

A sign not meeting the criteria above may be considered for inclusion in the inventory if it demonstrates extraordinary aesthetic quality, creativity, or innovation.

(iv) Landmark Districts

A landmark district includes all landmark districts previously designated before adoption of Chapter 17.62 of the Zoning Code and any grouping of contiguous properties that also meet the following criteria:

- a) Within its boundaries, a minimum of 60 percent of the properties qualify as contributing; and
- b) The grouping represents a significant and distinguishable entity of Citywide importance and one or more of a defined historic, cultural, development and/or architectural context(s) (e.g., 1991 Citywide historic context, as amended, historic context prepared in an intensive-level survey or historic context prepared specifically for the nominated landmark district).

When considering applications to designate a landmark district, the Historic Preservation Commission uses the National Register of Historic Places Bulletin #21: "Defining Boundaries for National Register Properties."

(b) Pasadena General Plan

As discussed in Section IV.A, Land Use, of this Draft EIR, development in the City is governed by the Pasadena General Plan (General Plan). The General Plan includes a Historic and Cultural Preservation Element (Preservation Element) which "seeks to identify and protect areas, sites and structures having architectural, historical or cultural

significance and to reaffirm their continuing value as a resource contributing to the vitality and diversity of the present.”¹² The goal of the Preservation Element is the “preservation and enhancement of the City’s cultural and historic buildings, streets and districts, not merely as gentle reminders of a pleasant past but also as relevant and unique alternatives for the present and the future—a source of community identity, social, ecological and economic vitality.”¹³

(c) Central District Specific Plan

As discussed in Section IV.A, Land Use, of this Draft EIR, development in central Pasadena is governed by the Central District Specific Plan (Specific Plan), which contains detailed development standards, distribution of land uses, infrastructure requirements, and implementation measures which implement the goals and policies of the General Plan.

The Project Site is located within the Central District Specific Plan area. The Specific Plan further divides the area into several sub-districts. The Project Site is located within the Old Pasadena Sub-district. The objective of the Old Pasadena Sub-district is to protect the numerous historic resources in the area, and to support the long term viability of its core as a regional retail and entertainment destination through the development of nearby complementary uses, including urban housing near light rail stations and parks.¹⁴ Within the Old Pasadena Sub-district, the Project Site is located just outside the Old Pasadena Historic Core, which extends to Fair Oaks Avenue just east of the Project Site and Union Street just south of the Project Site.

In order to guide development within the Central District, the Specific Plan includes a series of design guidelines. The design guidelines are divided into sections to address “private realm” concerns, including site planning, building design, and urban development patterns; and “public realm” concerns, including community character and the street environment. Specific guidelines are also included for each Sub-district within the plan area, including the Old Pasadena Sub-district. The primary component of the site planning guidelines is to encourage integrated site planning for projects throughout the Central District, so that any new development contributes to a coherent sense of the whole. This is accomplished by reinforcing the architectural context, placing a strong visual emphasis on the street, and supporting active public spaces.¹⁵ Other site planning-related guidelines

¹² *City of Pasadena, General Plan: Historic and Cultural Preservation Element, http://cityofpasadena.net/Planning/CommunityPlanning/General_Plan_Historical_and_Cultural/, accessed April 2014.*

¹³ *Ibid.*

¹⁴ *Central District Specific Plan, Section 7.*

¹⁵ *City of Pasadena, “Central District Specific Plan Section 9: Private Realm Design Guidelines,” 145, http://cityofpasadena.net/Planning/Design_Guidelines/, accessed April 2014.*

include defining public spaces, siting plazas and courtyards, creating comfortable outdoor rooms, maintaining landscape traditions, controlling vehicular access, and making service facilities unobtrusive.

The guidelines related to building design emphasize the notion of historical continuity and the relationship of built structures over time.¹⁶ These guidelines mandate that new development:

- Respect the surrounding character;
- Mitigate massing and bulk with the proper consideration of scale, massing, and detail of individual buildings;
- Unify and articulate building façades through a set of responsive, regulating proportions;
- Activate the street edge;
- Demarcate building entrances;
- Encourage high quality construction;
- Emphasize human-scale design;
- Design roof silhouettes; and
- Require compatible parking structures.¹⁷

The Old Pasadena Sub-district Design Guidelines do not specifically govern the Project Site, as it is located outside of the Old Pasadena Historic District. However, due to the proximity of the Project Site to the District, guidelines related to new construction may be considered to improve the compatibility of the proposed new construction and the District.

The Old Pasadena Sub-district Design Guidelines include guidelines related to the character and street environment:

- Reinforce the urban character;

¹⁶ *Ibid*, 152.

¹⁷ *Ibid*, 152–160.

- Enhance historic settings by responding sensitively to the historic buildings in the district;
- Build multiple connections, including paths between parking, buildings, and outdoor spaces;
- Promote active streets;
- Give pedestrians priority; and
- Contribute to the local identity.¹⁸

Guidelines related to site planning and building design include:

- Hold to the sidewalk edge;
- Provide mid-block passages;
- Encourage outdoor uses;
- Continue building rhythm and forms;
- Generate street-level interest; and
- Improve alley façades.¹⁹

b. Existing Conditions

(1) Project Site Conditions

As discussed in Section III, Project Description, of this Draft EIR, the Project Site is located in the City of Pasadena, directly south of the 134 freeway where it intersects with the 210 freeway. As shown in Figure III-3 in Section III, Project Description, of this Draft EIR, the Project Site occupies a superblock bounded on the north by Walnut Street, on the east by Fair Oaks Avenue, on the south by Union Street, and on the west by Pasadena Avenue. The Project Site contains the Parsons Corporation campus consisting of three office buildings and two parking structures constructed between 1974 and 1981. Photographs of the existing on-site uses are provided in Appendix B of the Historic Resources Report included in Appendix C of this Draft EIR.

¹⁸ *City of Pasadena, Central District Specific Plan Section 10: Sub-district Design Guidelines—Old Pasadena Design Guidelines*, 168.

¹⁹ *Ibid*, 169.

The northern portion of the Project Site contains a symmetrically composed building consisting of a 12-story tower flanked by three 4-story wings, all constructed in 1974 in a late Corporate Modern style (Main Building). The Main Building is surrounded by a surface parking lot with rows of mature trees, and is approached from the north (Walnut Street) by a concrete-paved plaza lined with square plaster pylons and rows of trees. The central tower has an octagonal plan and a flat roof, and is flanked to east and west by polygonal stair towers. The plans of the wings form irregular octagons with the four narrow sides projecting forward. The south wing directly abuts the tower; the northeast and northwest wings are free-standing and are connected to the tower by 3-story glazed hyphens. The façades are clad in precast concrete panels. Fenestration consists primarily of horizontal bands of floor-to-ceiling glazed metal storefront behind angled concrete fins. The recessed façades of the wings are clad in full-height glazed metal curtain walls with tinted glass. The primary entrance is symmetrically located on the north façade and consists of fully glazed metal storefront doors.

The southeast and southwest corners of the property are occupied by two 8-story office buildings constructed in 1977 and 1981 (Annex Buildings). The buildings are late Corporate Modern in style with rectangular plans and flat roofs. They are raised on concrete podiums and accessed by concrete steps. Their façades are clad in horizontal bands of precast concrete panels, alternating with continuous ribbons of metal-framed windows with tinted glazing. Their primary entrances are symmetrically located on their west and east façades and consist of pairs of fully glazed metal automatic sliding doors. Between the buildings are two parking structures, also constructed in 1977 and 1981, flanking De Lacey Avenue. The structures are four stories in height, have rectangular plans, and are of reinforced concrete construction. Their façades are clad in horizontal concrete panels.

The Project Site is located within an urbanized area dominated by commercial and government/institutional uses. Multi-family residential development is also located in the near vicinity. The Project Site borders the Old Pasadena Historic District, which is located directly south and east of the Project Site and listed in the National Register of Historic Places (1983; revised 2008).

(a) Site History and Context

(i) Development History

Located just north of Pasadena's historical downtown core, the area bounded by Walnut Street (formerly Mary Street), Union Street, Fair Oaks Avenue, and Pasadena Avenue was developed with commercial, light industrial, and residential uses during the late 19th and early 20th centuries. The 1931 Sanborn map reveals densely developed

blocks of commercial storefronts along Fair Oaks Avenue and Union Street, light industrial uses at mid-block, and residential properties at the northeast.²⁰

After World War II, Pasadena's historic downtown, centered on the intersection of Colorado Boulevard and Fair Oaks Avenue, fell into stagnation and eventual decline as the City's retail focus shifted to South Lake Avenue beginning in the late 1940s. Freeway construction beginning in the late 1950s furthered the area's decline.

By the 1960s, the City was actively promoting redevelopment in the downtown core to combat its economic decline and associated blight. In 1972, the City of Pasadena announced approval of the redevelopment of the Project Site as corporate headquarters for the Ralph M. Parsons Company, an engineering and construction firm. The project involved the relocation of 40 families and individuals living on the site, as well as 27 businesses.²¹ Completed in 1974, the project included a 12-story office tower and three 3-story satellite office buildings surrounded by a surface parking lot. In 1977, an 8-story office building and adjacent 3-story parking structure were constructed at the southeast corner of the Project Site. A similar office building and parking structure combination was constructed at the southwest corner of the Project Site in 1980.²²

The Parsons Corporation sold the property to Morgan Stanley Real Estate Investing and Lincoln Property Company in 2011.²³

(ii) *Architect Charles Luckman*²⁴

The Parsons campus was designed by Charles Luckman Associates. The firm's founder and namesake, architect Charles Luckman (1909–1999), was born in Kansas City and trained at the University of Illinois where he was a member of Professional Engineering Fraternity Theta Tau. Unable to find architectural commissions during the Great Depression, Luckman became a salesman with the Colgate–Palmolive–Peet Company (where his marketing techniques were credited with quadrupling profits) and he rapidly ascended the corporate ladder. Luckman soon became known as the “Boy Wonder of American Business,” was featured on the cover of *Time Magazine* at age 27, and, by age

²⁰ *Pasadena Sanborn Insurance maps 1930–1931.*

²¹ *Mann, Bert, “Pasadena OKs Plan for \$20 Million Complex,” Los Angeles Times, June 28, 1972.*

²² *Los Angeles County Assessor.*

²³ *Vincent, Roger, “Parsons sells Pasadena headquarters for \$320 million,” Los Angeles Times, July 5, 2011.*

²⁴ *Biography derived from the Charles Luckman Papers at Loyola Marymount University.*

33, had become the president of Pepsodent Toothpaste Company. Ultimately, when Lever Brothers acquired Pepsodent, Luckman became Lever's president.

Luckman distinguished himself as a patron of modern architecture when he commissioned a new headquarters building for Lever Brothers on Park Avenue in New York City. The resulting building, Lever House, was one of the first glass curtain wall skyscrapers in Manhattan. The tower was completed in 1956 and remains a landmark example of the International Style. This experience reminded Luckman of his passion for architecture, and he resigned the Lever presidency and moved to Los Angeles to start an architecture firm of Luckman Pereira with architect and fellow University of Illinois graduate William Pereira in 1950.

During his partnership with Pereira, Luckman routinely told clients that he was the businessman, while Pereira was the architect. Luckman was successful in bringing large-scale projects to the firm, including CBS' Television City in 1953. The firm became known for solving big architectural problems, and addressed a series of unprecedented programmatic challenges. Pereira & Luckman carried out the planning and design for the modernization of the Los Angeles International Airport and a series of large military projects for air and naval bases, including NASA's manned-spacecraft center in Houston. Luckman and Pereira split up in 1958, and Luckman formed his own firm, Charles Luckman Associates, which continued to land large commissions in Southern California and around the country.

Luckman quickly developed a reputation as a "businessman architect" who consistently delivered competently designed buildings on time and within budget. He was quoted as saying, "I am firm in my belief that architecture is a business and not an art," an attitude that endeared him to corporate executives, government officials, and civic leaders desiring architectural services without the aesthetic agenda and temperament of a self-styled architectural visionary.²⁵

In 1968, Luckman sold his firm to the Ogden Corporation, a major real estate developer in Southern California, and became president of its subsidiary, Ogden Development. His projects included major buildings in downtown Los Angeles, including the headquarters for the Pacific Coast Stock Exchange.

Some of Luckman's prominent Los Angeles-area buildings include the LAX Theme Building (1961) (with William Pereira, Paul R. Williams, and Welton Becket); 9200 Sunset

²⁵ Muschamp, Herbert, "Charles Luckman, Architect Who Designed Penn Station's Replacement Dies at 89," *The New York Times*, January 28, 1999.

Boulevard (Luckman Plaza) (1964); Century Park East Condominiums, Century City (1966); The Forum, Inglewood (1967); Federal Building, West Los Angeles (1969); and the Aon Center, Los Angeles (1974). Projects outside of Los Angeles include the Lyndon B. Johnson Space Center, Houston, Texas (1961); the Prudential Center, Boston (1964); Madison Square Garden, New York City (1968); Phoenix Civic Plaza, Phoenix, Arizona (1972); and Aloha Stadium, Honolulu, Hawaii (1975).

In addition to his architecture and business pursuits, Luckman has a notable record of public service and was the director of Freedom Train—part of President Truman’s program for rebuilding Europe after World War II. In recognition for his work, Luckman was awarded France’s Legion of Honor, England’s Order of St. John, and Italy’s Star of Solidarity. An active supporter of public service, Luckman served on the California State Board of Trustees from 1960–1982, and chaired the board twice. Luckman penned a detailed autobiography of his life and accomplishments at the age of 79: *Twice in a Lifetime—From Soap to Skyscrapers*. He passed away in Los Angeles in 1999.

(b) Potential Historic Resources within the Project Site

The Parsons Corporation campus at 100 W. Walnut Street has not been previously evaluated for historic significance through survey evaluation or environmental review. The following historic evaluation analyzes the Project Site for its potential historic significance using criteria for the National Register, California Register, and City of Pasadena Landmarks.

(i) Assessment of Eligibility for the National Register of Historic Places

Opened in 1974, the oldest portions of the Project Site will be 40 years old in June of 2014. As discussed in Section 2.a.1.a on page IV.E.1-1, as a general rule, properties that are less than 50 years old are not eligible for National Register listing. According to the National Register Criteria for Evaluation, properties that are less than 50 years old may be listed in the National Register of Historic Places only if they are of “exceptional importance” under criteria consideration “g.”²⁶ Because the Project Site does not meet the 50- year threshold at this time, it warrants evaluation under the “exceptional importance” consideration.

The Project Site is not known to be associated with any historically significant events or significant persons and, therefore, would not be considered significant under National Register Criteria A and B. Any historic significance for the Project Site would fall under

²⁶ *National Register Bulletin #22: Guidelines for Evaluating Properties That Have Achieved Significance Over the Past Fifty Years*. Washington DC: National Park Service, U.S. Department of the Interior.

National Register Criterion C, which recognizes resources that “embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.”

Although Charles Luckman and his firm made a significant contribution to the built environment, there is considerable debate about his overall contributions as an architect. Instead, he is primarily characterized as a businessman and much of his design work was not favorably reviewed by his contemporaries. William Pereira ultimately ended their partnership because he did not approve of Luckman’s determination to expand the firm, and felt that architecture could not be “managed in a bureaucratic fashion, but should be rendered with craft by the architect.”²⁷ When their partnership ended in 1958, William Pereira stated, “It is my conviction that I should limit the number of projects which my associates and I hope to undertake to those which we can contribute the most and which we can follow through personally from beginning to end.”²⁸

In a 1954 interview with *New Yorker* magazine, Luckman reinforced the idea of the architect as businessman:

*I am firm in my belief that architecture is a business, and not an art... I handle the programming of a job. I organize it. What is the problem? What is the client trying to achieve? If we do a project that is mostly engineering, I staff it with engineers. If it is mostly architectural, I staff it with architects.*²⁹

In 1962, *Time Magazine* ran a profile of Luckman that included criticism from other architects: “‘He is successful,’ says one top Chicago architect coolly, ‘because he produces anonymous architecture in a prescribed time and at the least cost and fuss to his clients.’”³⁰ The *Time* article referred to his architecture as mass production, coming off the assembly lines. A 1968 *Business Week* article declared that Luckman “sold architecture the way he sold soap: in bulk.”³¹

Writing Luckman’s obituary for *The New York Times* in 1999, Herbert Muschamp asserted that although designs from Luckman’s firm “adhered closely to the functionalist

²⁷ Rubin, Elihu James. *“Insuring the City: The Prudential Center and the Reshaping of Boston,”* Dissertation, University of California, Berkeley, 2004. (256).

²⁸ Rubin. (257).

²⁹ “Repeat Performance,” *New Yorker*, August 28, 1954. (16).

³⁰ “Corporations: The Second Time Around,” *Time*, March 30, 1962.

³¹ “He Sells Architecture the Way he Sold Soap,” *Business Week*, October 28, 1967. (78).

creed of modern design... his buildings highlighted the thin line that separated good modern architecture from mundane obedience to the bottom line.”³² Such assertions by colleagues and critics reinforce the general belief that much of the architectural work produced by Luckman’s office does not constitute examples of good architecture.

Although Charles Luckman was highly prolific and was certainly responsible for several iconic and distinguished buildings over his long career, no consensus has been established as to his status as a “master architect.” By 1974, Luckman was fully established as the president of Ogden Development Corporation and his influence on the design of individual commissions was probably minimal.

The Project Site was designed in an architectural style best described as “Late Modern,” a blanket term used to describe the evolution of Modern architecture from the mid-1950s through the 1970s. It is typically applied to commercial and institutional buildings. Unlike the strict geometric, simplicity of the International Style and Corporate Modernism, Late Modern buildings exhibit a more deliberate sculptural quality with bold geometric volumes, uniform surfaces such as glass skin or concrete, and a sometimes exaggerated expression of structure and systems. Sub-types of Late Modernism include New Formalism, which referenced and abstracted classical forms such as full-height columns, projecting cornices, and arcades, and Brutalism, noted for monolithic structures that stretched the limits of concrete construction.

Celebrated local examples of Late Modern architecture of the same period include the 1966 Liberty Savings and Loan building in Beverly Hills, designed by architect Kurt Meyer in a surprisingly engaging Brutalist style; the 1970 Ahmanson Center (now Wilshire Colonnade) on Wilshire Boulevard, a striking example of New Formalist architecture by Edward Durell Stone; A.C. Martin & Associates’ 1971 “Blue Cube” office building for Sears, Roebuck and Company in Alhambra, a 12-story glass skin office building perched atop canted concrete pedestals; and A. Quincy Jones’ elegant 1975 office building for Warner Bros. Records, a low, horizontal building integrated within a garden landscape.³³

The Project Site, while competently executing the programmatic needs for a corporate headquarters, is not particularly distinctive as a signature work of architecture or site planning, nor is it a distinctive example of period, style, or type. Despite some efforts to distinguish the massing with a grouped octagonal plan and articulate the façade with recessed areas and angled concrete fins in front of the window bands, the result is a fairly

³² Muschamp, Herbert, “Charles Luckman, Architect Who Designed Penn Station’s Replacement, Dies at 89,” *The New York Times*, January 28, 1999.

³³ *The Los Angeles Conservancy website*, www.laconservancy.org/architectural-style/late-modern, accessed April 4, 2014.

perfunctory example of corporate architecture that lacks the expressive qualities and formal innovations of highly regarded architecture from the same period throughout Southern California and the United States.

For these reasons, the Historic Resources Report concluded that the Project Site does not meet the National Register “exceptional importance” consideration necessary for properties that are less than fifty years old, and therefore is not eligible for listing in the National Register.

(ii) Assessment of Eligibility for the California Register of Historical Resources

As noted in Section 2.a.2 on page IV.E.1-4, the criteria for eligibility for listing in the California Register are based upon National Register criteria. Similar to the National Register criteria, the OHP has established a “special (criteria) consideration” for resources that are less than 50 years old. Because on-site development is less than 50 years old, the Project Site warrants evaluation under the special consideration. The Project Site is not known to be associated with any historically significant events or significant persons and therefore, would not be considered significant under California Register Criteria 1 and 2. Any historic significance for the property would fall under California Register Criterion 3 which is based on National Register Criterion C and recognizes a resource that “embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.”

As discussed in the National Register evaluation above, no consensus has been established as to Charles Luckman’s status as a “master architect,” and the Project Site is not a distinctive example of period, style, or type. For these reasons, the Historic Resources Report concluded that the Project Site does not meet the California Register “special consideration” criteria necessary for properties that are less than 50 years old and, therefore, is not eligible for listing in the California Register.

(iii) Assessment of Eligibility for Local Designation by the City of Pasadena

The City of Pasadena does not specify any particular age threshold for historic resources. The City’s Preservation Ordinance does state, however, that the criteria for the designation of historic resources are applied “according to applicable National Register of Historic Places Bulletins for evaluating historic properties.”

In June 2006, the City of Pasadena received a grant through the Certified Local Government program to prepare a historic context report for cultural resources of the recent past, as well as an accompanying reconnaissance survey of properties under this

context. For the purposes of the context report, the “recent past” was defined by the City as the period 1935 to 1965. The resulting historic context report was completed in 2007.³⁴

The *Cultural Resources of the Recent Past Context Report* identifies a “Commercial Building subtype: Large Office Building” as a property type under the Corporate/Industrial/Institutional Development theme.³⁵ Although the Project Site was constructed after 1965, the registration requirements provided for the Large Office Building subtype are helpful for local evaluation. Registration requirements state that “a commercial building that would qualify under this theme would typically be a large office, civic, institutional, or industrial building that is a good example of a particular architectural style associated with the period, and/or the work of a significant architect or designer. This property type would usually meet local or California registration requirements under Criterion C (3) as an individual resource.”

As discussed above, no consensus has been established as to Charles Luckman’s significance as an architect, and the on-site development is not a distinctive example of period, style, or type. Therefore, the Project Site would not be eligible under Criterion C. Likewise, the Project Site is not known to be associated with any historically significant events or significant persons and would not qualify under Criteria A or B. For these reasons, the Historic Resources Report concluded that the Project Site is not eligible for listing as a Pasadena Historic Monument, Landmark, or Landmark District.

(2) Surrounding Area Conditions

(a) *Old Pasadena National Register Historic District*³⁶

The Project Site is located just outside of the Old Pasadena Historic District (District), which is bordered by Union Street and Fair Oaks Avenue just south and east of the Project Site. The District is formally listed in the National Register and is listed in the California Register. Specifically, the District is significant under National Register Criteria A and C. Because it is listed in the National and California Registers, the District is considered a mandatory historical resource under CEQA.

³⁴ *Cultural Resources of the Recent Past*, prepared for the City of Pasadena by Historic Resources Group and Pasadena Heritage, 2007.

³⁵ *Ibid.* (58–59).

³⁶ United States Department of the Interior, National Park Service, “Old Pasadena Historic District (Additional Documentation/Boundary Change)” National Register of Historic Places Registration Form, 2008.

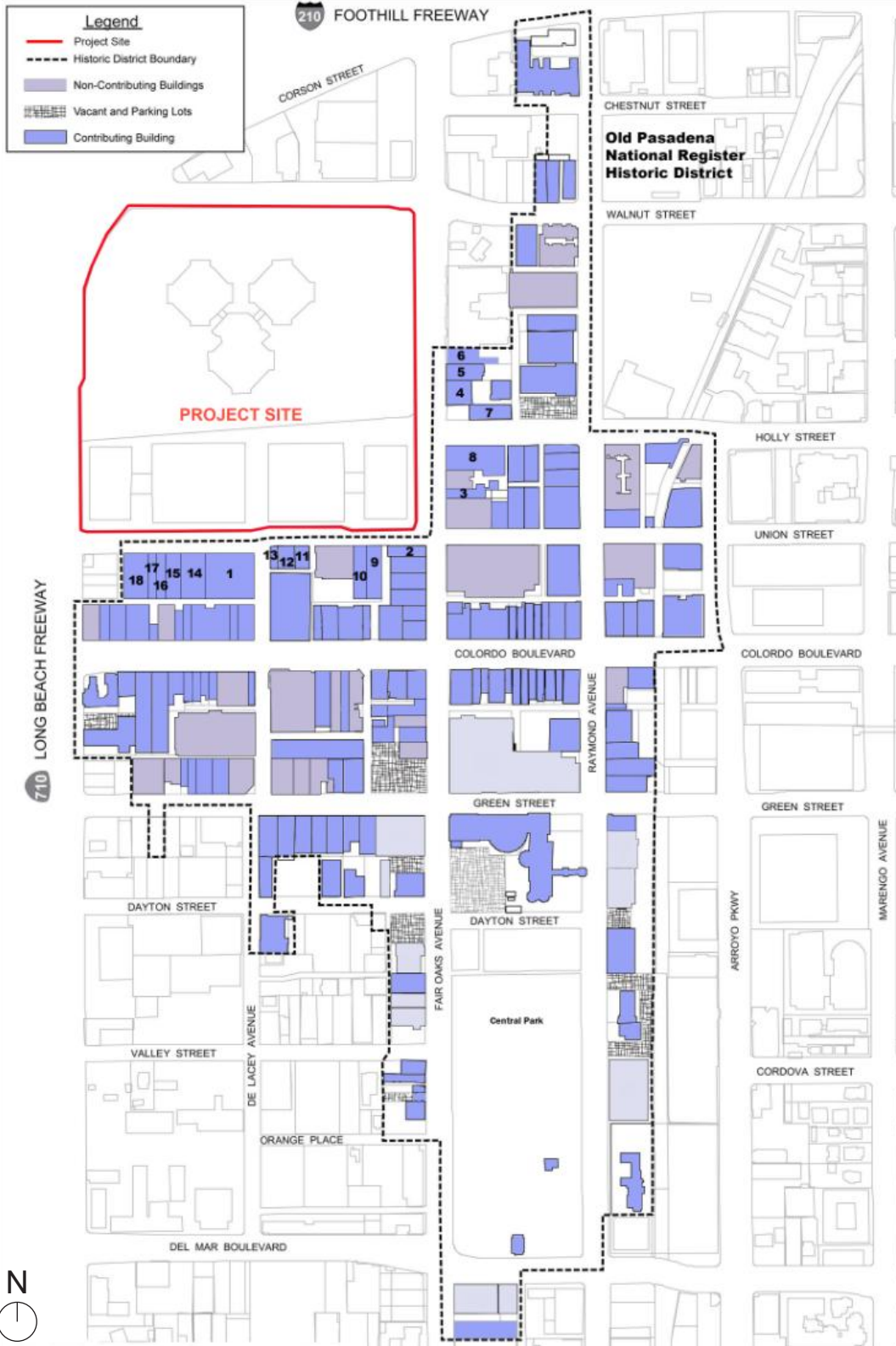
The District boundaries are irregular and incorporate Fair Oaks and Raymond Avenues, the main north-south streets, and Colorado Boulevard, the main east-west street. It is generally bound on the north by Chestnut Street, on the west by Pasadena Avenue, on the south by Del Mar Boulevard, and on the east by the Metro Gold Line tracks. The District contains 154 contributing and 40 non-contributing resources, which form the historic downtown of the City of Pasadena. Due to the changes that occurred within the District after it was first designated in 1983, the District was re-evaluated in 2008. At that time, the boundaries were expanded, and individual buildings within the District were re-classified as necessary.

As the historic commercial center of Pasadena, the District's physical form documents the economic development of the city and the city's various phases of growth between 1886 and 1936. The District also contains an important record of the evolution of architectural design in Southern California as well as the work of many prominent regional architects. Predominantly commercial in nature, the District also includes a few residential buildings, a train station, some light industrial uses, several churches, and a park. The strong stylistic eras of Old Pasadena can be discussed using three streets within the District as examples: Fair Oaks Avenue (1880s), Raymond Avenue (1890–1915), and Colorado Boulevard (1929–1930). Surrounding streets, especially Union Street and Green Street, offer small-scale buildings, which reflect their industrial and service support to businesses along the major commercial streets. Since the District was originally listed in 1983, many of the contributing buildings have been extensively rehabilitated in a manner consistent with the Secretary of the Interior's Standards.³⁷ A few contributing buildings have been demolished, and several new non-contributing buildings have been constructed. Most of the new construction occurred on vacant and surface parking lots, and is generally compatible with the historic architecture of the District. Overall, the District retains a high level of integrity and continues to convey its historic significance.

(b) Historic Resources in the Project Site Vicinity

As shown in Figure IV.E.1-1 on page IV.E.1-22, contributing buildings to the Old Pasadena Historic District are located south of the Project Site along Union Street and east

³⁷ *The Secretary of the Interior's "Standards for the Treatment of Historic Properties" (Standards) are a series of concepts about maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. Together with the "Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Guidelines), the Standards provide a framework and guidance for decision-making about work or changes to a historic property. Federal agencies use the Standards and Guidelines in carrying out their historic preservation responsibilities, and State and local officials use them in reviewing both Federal and nonfederal rehabilitation proposals. Historic district and planning commissions across the country use the Standards and Guidelines to guide their design review processes.*



of the Project Site along Fair Oaks Avenue. Contributing resources in the immediate vicinity of the Project Site include:

1. 34 N. De Lacey Avenue and 100 W. Union Street (Penn Oil Building), a two-story Art Deco building with a 47-foot tower, constructed in 1930.
2. 45–47 N. Fair Oaks Avenue, a two-story commercial brick building with Renaissance Revival, constructed in 1887.
3. 72 N. Fair Oaks Avenue, a two-story commercial brick vernacular building, constructed in 1904.
4. 76–82 N. Fair Oaks Avenue, a two-story Mission Revival style building, constructed in 1904.
5. 118–128 N. Fair Oaks Avenue (Marine Hotel), a two-story commercial brick vernacular building, constructed in 1884 and altered in 1904.
6. 130–134 N. Fair Oaks Avenue (Morison Transfer and Storage), a one-story commercial vernacular brick building located on the east side of Fair Oaks Avenue, constructed in 1918.
7. 11–15 E. Holly Street (Pierce Hotel), a two-story commercial brick vernacular building, constructed in 1924.
8. 2–20 E. Holly Street (Holly Hotel), a two-story commercial brick vernacular building, constructed in 1914.
9. 26–32 W. Union Street, a single-story commercial brick vernacular building, constructed in 1902 and altered in 1908.
10. 34–36 W. Union Street (Model Grocery Stables), a two-story vernacular brick livery building, constructed in 1905.
11. 62–64 W. Union Street (Schneider & Black Blacksmith Shop), a one- and two-story vernacular brick building, constructed in two phases in 1888–1900.
12. 70 W. Union Street (James Black Garage), a single-story commercial vernacular brick building, constructed in 1920.
13. 78 W. Union Street (Detroit Battery and Supply Company), a single-story commercial vernacular brick building, constructed in 1919.
14. 114–120 W. Union Street, a single-story commercial vernacular brick building, constructed in 1924.

15. 130 W. Union Street, a single-story commercial vernacular brick building, constructed in 1925.
16. 132 W. Union Street, a single-story commercial vernacular brick building, constructed in 1904.
17. 136 W. Union Street, a single-story commercial vernacular brick building, constructed in 1923.
18. 140 W. Union Street, a single-story commercial vernacular brick building, constructed in 1923.

3. Environmental Impacts

a. Methodology

A multi-step methodology was used to perform the Project's historical assessment, as detailed in the Historic Resources Report provided in Appendix C of this Draft EIR. In determining whether the Project would result in a "substantial adverse change" in the significance of a historic resource, the analysis: (1) evaluates the Project Site to determine if historic resources exist either within or adjacent to its boundaries; and (2) analyzes Project impacts for any adverse change in the significance of such resources. The analysis is based on field inspection and review of the following primary and secondary sources:

- Sanborn Fire Insurance maps;
- Historic photographs, aerial photographs, and local histories;
- National Register of Historic Places Inventory nomination forms;
- Architectural and Historical Inventory, City of Pasadena;
- List of Designated Historic Properties, City of Pasadena;
- Archival sources from the Pasadena Museum of History; and
- Local History Collection, the *Pasadena Star-News* Archives, and the *Los Angeles Times* Archives.

b. Thresholds of Significance

The Project may have a significant impact on historic resources if:

- The Project has the potential to cause an adverse change in the significance of a historic resource, as defined in Section 15064.5 of the State CEQA Guidelines, including those eligible for listing on the National Register of Historic Places, the California Register of Historical Resources, and/or the local register of historical resources.

c. Regulatory Compliance Measures and Project Design Features

(1) Regulatory Compliance Measures

No Regulatory Compliance Measures are in place with regard to historic resources.

(2) Project Design Features

As discussed in Section III, Project Description, of this Draft EIR, the Project proposes to create a mixed-use office campus and residential community on-site by removing the existing surface parking lots that currently surround the existing Parsons building and constructing a series of low- to mid-rise buildings. The Project will include a proposed PD Plan that will include a series of development standards that outline how the Project Site would be developed (e.g., maximum FAR, setbacks, mix of uses, parking, etc.). These standards would cover almost every category governing building and site construction such as: building setbacks, building articulation, building heights, sidewalk and paseo widths, permitted uses, and many other categories through the use of maximum and minimum quantities and measurements, and would incorporate applicable design requirements set forth in the Central District Specific Plan Design Guidelines. For further discussion of the design features included in the Project and the development standards anticipated to be included in the Project's PD Plan, refer to Section III, Project Description, of this Draft EIR.

d. Project Impacts

(1) Potential Impacts to On-Site Historic Resources

As discussed in Section 2.b.1 on page IV.E.1-12, no historically significant buildings, structures, objects, or sites are contained within the Project Site. All proposed new development under the Project would be confined within the boundaries of the Project Site and constructed on the existing surface parking lots and streets located on the Project Site. This includes the construction of new buildings, improvements to pedestrian circulation, and the extension of Holly Street west to connect with Pasadena Avenue. The existing north-south segment of Leonard J. Pieroni Street would also be realigned approximately 16 feet to the west. The Project would, therefore, involve demolition of existing surface

parking lots located on the Project Site, demolition of portions of the existing streets, and relocation of the existing north-south segment of Leonard J. Pieroni Street. These parking lots and streets, however, are not considered historically significant. Therefore, the Project would not demolish, destroy, relocate, alter, or reduce the integrity or significance of any historical resource located on the Project Site.

(2) Potential Impacts to Off-Site Historic Resources

As noted above, all new proposed development would be confined within the boundaries of the Project Site. Furthermore, the Project does not involve or anticipate the demolition, destruction, relocation, or alteration of any historic resources. Therefore, the Project would not demolish, destroy, relocate, or alter any significant historical resource in the vicinity of the Project Site.

As discussed in Section 2.b.2 on page IV.E.1-20, adjacent historical resources include contributing buildings to the Old Pasadena Historic District located south of the Project Site along Union Street and east of the Project Site along Fair Oaks Avenue (refer to Figure IV.E.1-1 on page IV.E.1-22). The Project would alter the immediate surroundings of these resources by constructing new buildings directly north and west of the Old Pasadena Historic District. As previously discussed, alteration of the immediate surroundings of a historic resource such that its significance would be materially impaired constitutes a substantial adverse change according to Section 15064.5(b) of the CEQA Guidelines. Because the Project would potentially add new buildings in areas currently used for surface parking, the immediate surroundings of the adjacent historic resources discussed above would be altered. In order for this alteration to be considered a substantial adverse change, however, it must be shown that the integrity and/or significance of the historical resources would be materially impaired by the proposed alteration.

No new buildings are proposed for Development Area E, which contains the southern portion of the Project Site south of Holly Street. Development in this area is confined to the realignment of the existing north-south segment of Leonard J. Pieroni Street and sidewalk and pedestrian improvements. The existing office buildings and parking structures would remain. Because no new buildings are planned in Development Area E, the setting and surroundings of the contributing buildings located on the south of Union Street would not substantially change, and historic resources to the south of the Project Site would not be impaired.

The construction of new buildings is proposed along Fair Oaks Avenue between Holly and Walnut streets. As shown in Figure IV.E.1-1, four contributing buildings to the Old Pasadena Historic District are located on the east side of Fair Oaks Avenue at the southern end of the block. The District is characterized by a diverse collection of buildings of varying

heights and densities, with heights ranging from one story up to eight stories. The Project proposes buildings up to 60 feet high in Development Area A, which is directly across from the contributing buildings on the east side of Fair Oaks Avenue, and up to 70 feet high in Development Area B located north of Development Area A. These heights are similar to the taller contributing buildings distributed throughout the District.

The four contributing buildings to the Old Pasadena Historic District located on the east side of Fair Oaks Avenue are one- and two-story buildings. Because the Project allows for buildings up to 70 feet in height, the proposed new buildings facing Fair Oaks Avenue would have the potential to be substantially taller than the contributing buildings across the street. This contrast in scale, however, would not adversely affect the Historic District, because a diversity of heights is consistent with the overall character of the Historic District.

Although the final design of the Project's individual buildings is not complete at this stage of the review and approval process, the Project would be governed by the Central District Specific Plan Design Guidelines which provide measures to ensure, among other things, that new developments within the Central District "respect the surrounding character" through "proper consideration of scale, massing, and detail of individual buildings." The Project includes setback and building articulation standards that incorporate those set forth in the Central District Specific Plan Design Guidelines. For instance, the Project mandates a 5-foot setback from Fair Oaks Avenue in Development Area A and setbacks between 0 and 10 feet in Development Area B. While allowing for some variation, this fairly narrow range of allowable setback would help create a building street wall on the west side of Fair Oaks Avenue more in keeping with the existing building street wall on the east side of Fair Oaks Avenue.

If designed in accordance with the Central District Specific Plan Design Guidelines and the Project's proposed development standards, the Project would result in new construction that is compatible with the overall character of the Old Pasadena Historic District, and the integrity of the District would not be materially impaired by alterations to its setting caused by the Project. The proposed new construction would not diminish the ability of any district contributor to convey its significance as a contributor to the Historic District. After implementation of the Project, the Old Pasadena Historic District would continue to convey its historic significance. Therefore, the Project would not impair the integrity or significance of any off-site historical resource.

(3) Summary of Potential Impacts to Historic Resources

The preceding analysis concludes the following:

- No historic resources are present on the Project Site.
- The Project would not demolish, relocate or alter any historic resources adjacent to or in the near vicinity of the Project Site.
- The Project would not involve construction that reduces the integrity or significance of historic resources either adjacent to or in the near vicinity of the Project Site.

For these reasons, the Project would not cause an adverse change in the significance of a historic resource, as defined in Section 15064.5 of the State CEQA Guidelines, including those eligible for listing on the National Register of Historic Places, the California Register of Historical Resources, and/or the local register of historical resources. Impacts to historic resources would be less than significant, and no mitigation measures are required.

4. Cumulative Impacts

Cumulative impacts on historic resources evaluate whether impacts of the Project and related projects, when taken as a whole, substantially diminish the number of historic resources within the same or similar context or property type. However, impacts to historic resources, if any, tend to be site-specific. It is anticipated that historic resources that are potentially affected by related projects would also be subject to the same requirements of CEQA as the Project. These determinations would be made on a case-by-case basis and the effects of cumulative development on historic resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Nevertheless, impacts for related projects could be determined to be significant and unavoidable. However, as the Project would not impact historic resources, the Project would not have a cumulatively considerable contribution to a significant impact, and thus, cumulative impacts would be less than significant.

5. Mitigation Measures

Project-level and cumulative impacts related to historic resources would be less than significant. Therefore, no mitigation measures are required.

6. Level of Significance After Mitigation

With implementation of the Project Design Features discussed above, Project-level and cumulative impacts related to historic resources during construction and operations of Phase 1, Phase 2 and Project Buildout would be less than significant.