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1100 North Grand Avenue,
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Re: Impact Assessment for Historic Resources included in the Proposed Mount San Antonio College
2018 Educational and Facilities Master Plan

Dear Ms. Klein

ASM Affiliates, Inc. (ASM) has prepared this cultural resource technical memo for the Draft Environmental Impact Report (EIR) being prepared by Psomas for the Mount San Antonio College *2018 Educational and Facilities Master Plan (EFMP)*. This report was prepared in compliance with federal and state guidelines, Walnut City ordinances, and the California Environmental Quality Act (CEQA). The scope of the proposed Mount San Antonio College 2018 Educational and Facilities Master Plan construction and renovation projects includes the renovation of a number of historical resources in the Mount San Antonio College Historic District. ASM has previously prepared the following cultural resources reports for historic buildings on the Mount San Antonio College (Mt. SAC) campus:

- 2012 *Historic Resources Analysis for Five Buildings at Mount San Antonio College* for 5 contributing buildings in the Mt. SAC Historic District;
- 2016 *Cultural Resource Evaluation Report for Mt. SAC SEIR for 2015 Facilities Master Plan Update and Physical Education Projects* for 33 contributing buildings in the Mt. SAC Historic District (listed in the report's Table 4 and shown in Figure 42);
- 2018 Historic American Buildings Survey (HABS) documentation for 17 of the buildings in the historic district (shown in the HABS report's Table 1) that were expected to be impacted by planned campus construction projects, including the demolition of the National Register of Historic Places (NRHP) individually eligible Hilmer Lodge Stadium.

Subsequent to ASM's preparation of the above cultural resource reports, Mt. SAC distributed a 2018 Notice of Preparation (NOP) of a Draft EIR in relation to the proposed Mt. San Antonio College EFMP. This letter report assesses the potential impacts from the EFMP to the contributing resources to the Mount San Antonio College Historic District identified in ASM's prior comprehensive evaluation report (Davis 2016).

2018 Educational and Facilities Master Plan (EFMP)

The scope of the 2018 EFMP is a 10-year period of development and redevelopment of the Mt. SAC campus, and includes multiple renovation, demolition, and construction projects; the overall project has been ordered as Phase 1A, Phase 1B, Phase 2, and Phase 3. Phases 1A, 1B, and 2 are included in the EFMP and the EIR and will include 17 contributing resources in the Mt. SAC Historic District

(highlighted in Table 1, below). Although Phase 3 is outside of the horizon year for the 2018 EFMP, the buildings that are part of Phase 3 are also addressed in this report to identify those buildings with the potential for adverse impacts.

Building Number	Building Name	Individually Eligibility	CA SHPO Status Code	Included in Prior HABS	Impacts Considered in 2016
1A	Art Center		3CD	Yes	
1B/C	Art Center/Gallery		3CD	Yes	
3	Gym		3CD	Yes	
4	Administration		3CD	No	
6	Library		3CD	Yes	Yes*
7	Science South		3CD	No	
8	Campus Cafe			Yes	
9A	SAC Book Rac (Bookstore)		3CD	Yes	Yes*
9C	Student Life Center		3CD	Yes	
10	Founder's Hall		3CD	No	
11	Science North		3CD	No	
12A/B	Oden House			Yes	Direct Yes
17	Building 17		3CD	Yes	
18	Building 18		3CD	Yes	
19A	Building 19A		3CD	No	
19B	Building 19B		3CD	Yes	
20	Building 20		3CD	Yes	
26A	Humanities/Social Sciences North		3CD	No	
26B	Humanities/Social Sciences East		3CD	No	
26D	Humanities/Social Sciences South		3CD	No	
26C	Planetarium		3CD	No	
27A	Exercise Science/Wellness Center		3CD	Yes	Yes
27B	Pool Building		3CD	Yes	Yes
27C	Physical Education Center		3CD	Yes	Yes
28A/B	Technology Center	Yes, Criterion 3	3CB	Yes	Yes*
47	Facilities Planning & Management/Maintenance & Operations Center		3CD	No	
48	Receiving/Transport		3CD	No	
F1	Horticulture Unit		3CD	No	
F2A	Farm Offices		3CD	No	
F2B	Horticulture Storage		3CD	No	
F3A	Old Dairy Unit		3CD	No	
F4A	Swine Market Pens		3CD	No	
F5A	Vivarium		3CD	No	
F7	Mountie Makerspace		3CD	No	
G2	Greenhouse			No	
50A-H	Stadium	Yes, Criterion 1	3CB	Yes	Direct Yes
	Wildlife Sanctuary		3CD	No	Yes

Table 1. Contributing Resources to the Mt. SAC Historic District

* Prior assessment of direct impacts assumed renovations complied w/ the *SOI Standards*

Yellow highlight indicates buildings that are subject to potential impacts as part Phases 1A, 1B, and 2 of the 2018 Master Plan

Blue highlight indicates buildings that are subject to potential impacts as part Phase 3 of the 2018 Master Plan

Renovation Projects

Specific designs for the EFMP project's renovations to contributing resources to the Mt. SAC Historic District have not yet been developed. Some of the buildings/projects in the EFMP were included in an assessment of impacts on cultural resources for the Supplemental Environmental Impact Report (Davis 2016). However, renovations proposed for Buildings 7, 26 A/B/D, 47, and 48 were not previously considered. Because these buildings are contributing resources to the Mt. SAC Historic District, it is recommended that the designs for their renovations comply with the *Secretary of the Interior's Standards for Rehabilitation*. Should the renovations not comply with the *Standards*, the project may result in a significant direct and/or indirect impact to a historical resource pursuant to CEQA Section 15064.5.

Demolition Projects

Buildings 1A and 19A are scheduled to be demolished as part of Phase 1A. Building F3A is scheduled to be demolished as part of Phase 3. In addition, Buildings 3, 9C, 17, 18, 19A, 19B, and 20 will be demolished to allow for new construction. The demolition of the buildings poses the potential to cause an adverse direct impact because the Project results in the complete loss of contributing resources to a historic district (Attachment A). As such, the Project will result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Section 21084.1 and a significant direct impact pursuant to CEQA Section 15064.5.

New Construction

The EFMP also calls for new construction throughout the historic district which poses the potential to cause adverse indirect visual impacts. Visual impacts upon the historic district and individually eligible resources potentially include views to and from the district and buildings. Mid-ground views of the historic district towards and from the contributing resources are character-defining features. Distant views are not a character-defining feature of the historic district, due to the dense concentration of buildings and/or topography of the land. New construction of the following buildings will take place within the boundaries of the Mt. SAC Historic District within the viewsheds of contributing resources to the district:

- Student Center (located in the center of campus)
- Bookstore (located in the center of campus)
- Parking Structure R and Tennis Courts (located in the south portion of campus below Temple)
- Parking Structure S (located in the south portion of campus below Temple)
- Sand Volleyball Courts (located in the south portion of campus below Temple)
- Replacement Communication Tower (located outside the historic district boundary but within viewshed of the eastern portion of the district)

The new parking structures, tennis court, volleyball courts, and communication tower will not result in a visual impact. These buildings/structures will not introduce an element that is incompatible with the criteria under which the property is eligible, nor will they result in obstructive views. Their design will be compatible with the character-defining features of the historic district. The overall impact to the historic district's integrity of setting, feeling, or association as a whole is minimal; there is no impact on the historic district's integrity of location, design, materials, and workmanship. As such, this aspect of the project will not result in any adverse indirect visual impacts pursuant to CEQA Section 15064.5.

The Student Center and Bookstore are located in the center of the historic district and will create a visual interruption of the mid-ground views from contributing resources in the historic district (specifically 10, 11, and 26 A/B/C/D). The new Student Center and Bookstore will also impact the historic district's

integrity of setting, feeling, or association. These new buildings will result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Section 21084.1 and a significant indirect impact pursuant to CEQA Section 15064.5.

Cumulative Impacts

In consideration of cumulative impacts within the APE, several prior Projects have been conducted that resulted in adverse impacts. The 2003 Facilities Master Plan resulted in the demolition of several contributing resources to the Mt. SAC Historic District, as identified by Tim Gregory (Gregory 2003). The 2015 Facilities Master Plan and Physical Education Projects (2016) resulted in the demolition of several additional contributing resources to the Mt. SAC Historic District, as identified by Gregory in 2003 and ASM in 2012 and 2016 (Gregory 2003; Davis 2012; Davis et al. 2016). As the prior two Facilities Master Plans and updates identified adverse impacts, combined with the currently identified adverse impacts, the EFMP will result in adverse cumulative impacts to a CEQA historical resource, specifically, the Mt. SAC Historic District. With the number of contributing resources lost as a result of the EFMP, the Mt. SAC Historic District will no longer be eligible (Attachment A). As such, the EFMP constitutes a substantial adverse change in the significance of a historical resource pursuant to CEQA Section 21084.1 and a significant indirect impact pursuant to CEQA Section 15064.5.

Mitigation Measures

1) HABS Documentation Addendum for Mt. SAC Historic District

HABS documentation shall be implemented to reduce the significant impact on contributing resource the Mt. SAC Historic District. An augment to the prior HABS documentation package shall be prepared to include all contributing resources within the district not previously recorded specifically 4, 7, 10, 11, 19A, 26A, 26B, 26D, 26C, 47, 48, F1, F2A, F2B, F3A, F4A, F5A, F7, G2, and the Wildlife Sanctuary:

a) HABS Level II Narrative Historical Report

As HABS documentation has been prepared for the historic district, this report would serve as an addendum to the extant documentation prepared consistent with *Historic American Buildings Survey (HABS) Guidelines for Historical Reports* (National Park Service 2007). Prior to the demolition or renovation of resources contributing to the Mt. SAC Historic District, the college shall enlist the services of a qualified architectural historian to prepare an Addendum HABS Narrative Historical Report as well as CA DPR 523 forms that documents all contributing resources that were not previously documented. Documentation through HABS is an important measure because it allows documentation of the resource before alterations begin. Given the relative historic significance of the resources, Level II HABS is the recommended documentation standard, to be prepared in accordance with the *Secretary of Interior Standards and Guidelines for Architectural and Engineering Documentation* and HABS specific guidelines (<http://www.nps.gov/hdp/standards/habsguidelines.htm>). A narrative historical report following the *Historic American Buildings Survey Guidelines for Historical Reports* (National Park Service 2007) should be prepared for the adversely impacted resources. All historic documents shall be made available to the public in the collection of the College's Learning Technology Center. Facilities Planning & Management shall ensure compliance.

b) HABS Level II Large-format Photographs

A qualified HABS photographer shall provide photo-documentation all the that documents all contributing resources that were not previously documented. As described in Section 7, *Mitigation Measures CRER Mt. SAC SEIR for 2015 FMPU and PEP 71* (Davis 2016), the photo-documentation shall be made available to the public in the collection of the College's Learning

Technology Center. The documentation should be done in accordance with the Guidelines provided in the *Photographic Specifications: Historic American Building Survey, Historic American Engineering Record, Division of National Register Programs, National Park Service, Western Region*. Facilities Planning & Management shall ensure compliance.

c) HABS Level II Reproduction of select existing drawings (if available)

The college shall prepare archivally stable reproduction of original as-built drawings for all contributors that were not previously included in the HABS documentation. Reproductions of drawings shall be done in accordance with the *Secretary of the Interior's Guidelines for Architectural and Engineering Documentation*. Select existing drawings, where available, may be photographed with large-format negatives or photographically reproduced on Mylar or Velum in accordance with the U.S. Copyright Act, as amended. Facilities Planning & Management shall ensure compliance.

d) Monitoring

There is a possibility of unanticipated and accidental archaeological discoveries during ground disturbing activities. For the demolition of Buildings 1A, 19A, and F3A, and ground disturbance for the new construction within the district:

- During construction grading and site preparation activities, the Contractor shall monitor all construction activities. In the event that cultural resources (i.e., prehistoric sites, historic sites, and/or isolated artifacts) are discovered, work shall be halted immediately within 50 feet of the discovery and the Contractor shall inform the Project Manager. A qualified archaeologist that meets the Secretary of the Interior's Standards and Guidelines for Professional Qualifications in Archaeology shall be retained to analyze the significance of the discovery and recommend further appropriate measures to reduce further impacts on archaeological resources. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Facilities Planning & Management shall monitor compliance.
- If, during the course of implementing the project, human remains are discovered, all work shall be halted immediately within 50 feet of the discovery, the Contractor shall inform the Project Manager, and the County Coroner must be notified according to Section 5097.98 of the PRC and Section 7050.5 of California's Health and Safety Code. If the remains are determined to be Native American, the coroner will notify the Native American Heritage Commission, and the procedures outlined in CEQA Section 15064.5(d) and (e) shall be followed.

2) Interpretative Display for Mt. SAC Historic District

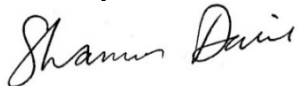
To recognize the history of Mt. SAC, interpretive sign(s) shall be established in one or adjacent to one of the major buildings in the historical heart of the campus, such as the Library or Student Center. The interpretative panels could utilize information from the HABS Level II Narrative Historical Report and large-format photographic documentation, as well as historical views of the campus. Facilities Planning & Management shall ensure compliance.

Level of Significance After Mitigation

The demolition of buildings in the EFMP results in the loss of eligibility of the Mt. SAC Historic District. This constitutes an adverse direct impact even after undertaking the recommended mitigation. As such, the Project will result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Section 21084.1 and a significant direct impact pursuant to CEQA Section 15064.5.

Although the above recommended mitigation measures are recommended by ASM to lessen the significant adverse impacts, demolition or complete loss of eligibility of a CEQA historical resource cannot be mitigated to less than significant. As such, even after the implementation of the mitigation measures, the Project will still result in a substantial adverse change in the significance of a historic resource pursuant to CEQA Section 21084.1 and a significant direct impact pursuant to CEQA Section 15064.5.

Sincerely,



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Attachment A: Mt. SAC Historic District Contributors Remaining After EFMP

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EFMP**

