5.1 Cultural Resources
5.1 CULTURAL RESOURCES

The purpose of this section is to examine the potential for cultural resources (including historic, prehistoric, and paleontological) to occur within and around the Project site and to assess their significance. Mitigation measures are recommended to avoid or lessen impacts to cultural resources resulting from Project implementation. The information in this section is based upon the following documentation:

- 2810 E. 1st Street Long Beach, California Historical Resource Report (Galvan Preservation Associates, February 2013) (Appendix B, Historical Resource Report);
- City of Long Beach Historic Preservation Element (2010);
- City of Long Beach Municipal Code (enacted August 17, 2010); and
- Bluff Park Historic Landmark District Designation Ordinance.

5.1.2 REGULATORY SETTING

Numerous laws and regulations require Federal, State, and local agencies to consider the effects a project may have on cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies (i.e., State Historic Preservation Office and the Advisory Council on Historic Preservation). The National Historic Preservation Act (NHPA) of 1966, as amended, the California Environmental Quality Act (CEQA), and the California Register of Historical Resources, Public Resources Code (PRC) 5024, are the primary Federal and State laws governing and affecting preservation of cultural resources of national, State, regional, and local significance. The applicable regulations are further discussed below.

FEDERAL

National Historic Preservation Act of 1966

Enacted in 1966 and amended in 2000, the National Historic Preservation Act (NHPA) declared a national policy of historic preservation and instituted a multifaceted program, administered by the Secretary for the Interior, to encourage the achievement of preservation goals at the Federal, State and local levels. The NHPA authorized the expansion and maintenance of the National Register of Historic Places (NRHP or National Register), established the position of State Historic Preservation Officer (SHPO) and provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assisted Native American tribes to preserve their cultural heritage and created the Advisory Council on Historic Preservation (ACHP).

Section 106 Process

Through regulations associated with the NHPA, an impact to a cultural resource would be considered significant if government action would affect a resource listed in or eligible for listing.
in the National Register. The NHPA codifies a list of cultural resources found to be significant within the context of national history, as determined by a technical process of evaluation. Resources that have not yet been placed on the National Register, and are yet to be evaluated, are afforded protection under the Act until shown to be not significant.

**CRITERIA**

Section 106 of the NHPA and its implementing regulations (36 Code of Federal Regulations Part 800) note that for a cultural resource to be determined eligible for listing in the National Register, the resource must meet specific criteria associated with historic significance and possess certain levels of integrity of form, location, and setting. The criteria for listing on the National Register are applied within an analysis when there is some question as to the significance of a cultural resource. The criteria for evaluation are defined as the quality of significance in American history, architecture, archeology, engineering, and culture. This quality must be present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

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

Criterion D is usually reserved for archaeological resources. Eligible cultural resources must meet at least one of the above criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character.

The Section 106 evaluation process does not apply to projects undertaken under City environmental compliance jurisdiction, however, should the undertaking require funding, permits or other administrative actions issued or overseen by a federal agency, analysis of potential impacts to cultural resources following the Section 106 process will likely be necessary. The Section 106 process typically excludes cultural resources created less than 50 years ago unless the resource is considered highly significant from the local perspective. Finally, the Section 106 process allows local concerns to be voiced and the Section 106 process must consider aspects of local significance before a significance judgment is rendered.

**PHYSICAL INTEGRITY**

According to National Register Bulletin #15, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity.” Integrity is defined in National Register Bulletin #15 as “the ability of a property to convey its significance.” Within the concept of integrity, the National Register
recognizes seven aspects or qualities that in various combinations define integrity. They are feeling, association, workmanship, location, design, setting, and materials, and they are defined by National Register Bulletin #15 as follows:

- Location is the place where the historic property was constructed or the place where the historic event occurred.
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting is the physical environment of a historic property.
- 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.

CONTEXT

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

Secretary of the Interior’s Standards for the Treatment of Historic Properties

Evolving from the Secretary of the Interior’s Standards for Historic Preservation Projects with Guidelines for Applying the Standards that were developed in 1976, the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings were published in 1995 and codified as 36 CFR 67. Neither technical nor prescriptive, these standards are “intended to promote responsible preservation practices that help protect our Nation’s irreplaceable cultural resources.” “Preservation” acknowledges a resource as a document of its history over time, and emphasizes stabilization, maintenance, and repair of existing historic fabric. “Rehabilitation” not only incorporates the retention of features that convey historic character but also accommodates alterations and additions to facilitate continuing or new uses. “Restoration” involves the retention and replacement of features from a specific period of significance. “Reconstruction,” the least used treatment, provides a basis for recreating a missing resource. These standards have been adopted, or are used informally, by many agencies at all levels of government to review projects that affect historic resources.
STATE

California Environmental Quality Act

As defined in CEQA Section 21083.2, a “unique” archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is high probability that it meets any of the following criteria:

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

If a lead agency determines that an archaeological site is a historical resource, the provisions of Section 21084.1 of CEQA and Section 15064.5 of the CEQA Guidelines apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site is to be treated in accordance with the provisions of CEQA Section 21083, which covers a unique archaeological resource. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (CEQA Guidelines Section 15-64.5(c)(4)).

California Register of Historical Resources

Created in 1992 and implemented in 1998, the California Register of Historical Resources (CRHR) is “an authoritative guide in California to be used by State and local agencies, private groups, and citizens to identify the State’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.” Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historical resources surveys or designated by local landmarks programs, may be nominated for inclusion in the CRHR.

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

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

The criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1 to 4 instead of A to D. To be eligible for listing in the California Register, a property must be at least 50 years of age and possess significance at the local, state, or national level, under one or more of the following four criteria:

- **Criterion 1**: It is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.

- **Criterion 2**: It is associated with the lives of persons important in our past.

- **Criterion 3**: It 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.

- **Criterion 4**: It has yielded, or may be likely to yield, information important in history or prehistory.

Historical resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. Resources less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.

**California Points of Historical Interest**

California Points of Historical Interest (Points) are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental or other value. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historical resource may be designated as both a landmark and a “point.” If a point is subsequently granted status as a landmark, the point designation will be retired.

To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

- The first, last, only or most significant of its type within the local geographic region (city or county);

- Associated with an individual or group having a profound influence on the history of the local area; or

- A prototype of, or an outstanding example of, a period, style, architectural movement, or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder.
State Historical Building Code

Created in 1975, the State Historical Building Code (SHBC) provides regulations and standards for the preservation, restoration, rehabilitation, or relocation of historic buildings, structures, and properties that have been determined by an appropriate local or State governmental jurisdiction to be significant in the history, architecture, or culture of an area. Rather than being prescriptive, the SHBC constitutes a set of performance criteria. The SHBC is designed to help facilitate restoration or change of occupancy in such a way as to preserve original or restored elements and features of a resource; to encourage energy conservation and a cost-effective approach to preservation; and to provide for reasonable safety from earthquake, fire, or other hazards for occupants and users of such “buildings, structures and properties.” The SHBC also serves as a guide for providing reasonable availability, access, and usability by the physically disabled.

Government Code (Section 65352.3, SB 18/Sacred Lands File Search)

Pursuant to Government Code Section 65352.3, prior to the adoption or any amendment of a city or county’s general plan (proposed on or after March 1, 2005), the city or county shall conduct consultations with California Native American tribes that are on the contact list maintained by the Native American Heritage Commission (NAHC) for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code that are located within the city or county’s jurisdiction.

The Project does not involve a General Plan Amendment, thus, does not warrant consultations with California Native American tribes.

California Health and Safety Code (Section 7050.5)

California Health and Safety Code Section 7050.5 requires that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

California Public Resources Code (Section 5097.98)

Section 5097.98 of the California Public Resources Code stipulates that whenever the commission receives notification of a discovery of Native American human remains from a county coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The decedents may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any
associated grave goods. The descendents shall complete their inspection and make their recommendation within 24 hours of their notification by the Native American Heritage Commission. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

**CITY OF LONG BEACH**

**General Plan**

The City of Long Beach General Plan contains a Historic Preservation Element. The Element is composed of two parts: Part 1, Background and Context for Historic Preservation; and Part 2, Historic Preservation Program. The Element defines historic and cultural resources based on legal statutes at the federal and state levels. It also contains lists of National Historic Landmarks, Properties Listed in the National Register of Historic Places, and California Historical Landmarks. No California Points of Historical Interest are noted. Included in the historic preservation designation programs is a listing of Long Beach’s Designated Historic Landmarks and Historic Districts. Bluff Park Historic District (District), where the Project site is located, is included in the General Plan’s list of Historic Districts as District #4. Additionally, Long Beach has the primary components of a comprehensive preservation program in place:

- Participation in the Certified Local Government (CLG) Program;
- A Cultural Heritage Ordinance that allows for the designation of individual structures and districts;
- A Cultural Heritage Commission to advise the Planning Commission and City Council on historic preservation issues; and
- A comprehensive historic resources inventory with a plan for continuing updates.

The following General Plan Goals, Policies, and Implementation Measure are in place regarding historic, cultural, or archeological resource preservation pertaining to the Project:

**Goal 1**: Maintain and support a comprehensive, citywide historic preservation program to identify and protect Long Beach’s historic, cultural, and archaeological resources.

**Policies (P):**

P.1.1 - The City shall comply with City, State, and Federal historic preservation regulations to ensure adequate protection of the City’s cultural, historic, and archaeological resources.

**Implementation Measures (IM)**

IM.1.1 - The City will continue to monitor historic preservation regulations from federal and state codes and, as changes occur, incorporate the new standards into the City’s Municipal Code, and into its planning and development review activities. With assistance from the Legal Department, the Development Services Department will periodically recommend updates to the provisions of the Municipal Code to ensure consistency with federal and state codes.
IM.1.2 - Alterations to historic properties will be reviewed according to the Secretary of the Interior’s Standards and in accordance with the California Environmental Quality Act.

Goal 2: Protect historic resources from demolition and inappropriate alterations through the use of the City’s regulatory framework, technical assistance, and incentives.

P.2.2 - The City shall encourage and allow for adaptive reuse of historic buildings.

P.2.3 - The City shall continue to use the Secretary of the Interior’s Standards as guidelines for appropriate rehabilitation projects, adaptive reuse, or additions to historic structures.

P.2.4 - The City shall ensure compliance of all historic preservation, redevelopment, and new construction projects with the California Environmental Quality Act (CEQA), and Section 106 of the National Historic Preservation Act.

P.2.5 - The City shall enforce historic preservation codes and regulations.

IM.2.2 The City will ensure compliance with the California Environmental Quality Act (CEQA) and Section 106 of the National Historic Preservation Act, and will continue to consult with the appropriate organizations and individuals to minimize potential impacts to historic, cultural, and archaeological resources.

Goal 3: Maintain and expand the inventory of historic resources in Long Beach.

Goal 5: Integrate historic preservation policies into City’s community development, economic development, and sustainable-city strategies.

P.5.6 - The City shall encourage creative and adaptive reuse of historic buildings as a sustainable practice, as well as an opportunity to further cultural tourism, and the economic or community development objectives of the surrounding community.

IM.5.5 - The City will encourage historic preservation through adopted provisions for reduced parking and adaptive reuse of historically significant properties, and will uphold such provisions in future updates to the Municipal Code.

IM.5.8 - As a sustainable practice, the City will encourage salvaging architectural features for reuse prior to the demolition or rehabilitation of a building.

Municipal Code

The Long Beach Municipal Code (LBMC) Chapter 2.63 is the primary tool used to protect historic resources in Long Beach. The City’s current Cultural Heritage Ordinance is fairly comprehensive and is structured to address the particular needs and resources within the community. In general, the Cultural Heritage Ordinance provides for the establishment of a Cultural Heritage Commission, sets the number of commissioners required, and establishes their qualifications and duties. It also establishes procedures for the designation of landmarks and landmark districts, and for reviewing proposed work on designated landmarks or properties within landmark districts (Certificate of Appropriateness). The Commission administers the...

The LBMC provides criteria for designation of landmarks and landmark districts. A resource may be recommended for designation as a landmark or landmark district if it manifests one or more of the following criteria:

A. It possesses a significant character, interest or value attributable to the development, heritage or cultural characteristics of the city, the southern California region, the state or the nation; or

B. It is the site of a historic event with a significant place in history; or

C. It is associated with the life of a person or persons significant to the community, city, region or nation; or

D. It portrays the environment in an era of history characterized by a distinctive architectural style; or

E. It embodies those distinguishing characteristics of an architectural type or engineering specimen; or

F. It is the work of a person or persons whose work has significantly influenced the development of the city or the southern California region; or

G. It contains elements of design, detail, materials or craftsmanship which represent a significant innovation; or

H. It is a part of or related to a distinctive area and should be developed or preserved according to a specific historical, cultural or architectural motif; or

I. It represents an established and familiar visual feature of a neighborhood or community due to its unique location or specific distinguishing characteristic; or

J. It is, or has been, a valuable information source important to the prehistory or history of the city, the southern California region or the state; or

K. It is one of the few remaining examples in the city, region, state or nation possessing distinguishing characteristics of an architectural or historical type; or

L. In the case of the designation of a tree(s) based on historic significance, that the tree(s) is (are) associated with individuals, places and/or events that are deemed significant based on their importance to national, state and community history; or

M. In the case of the designation of a tree(s) based on cultural contribution, that the tree(s) is (are) associated with a particular event or adds (add) significant aesthetic or cultural contribution to the community.
The Project site is located within the Bluff Park Historic District (District). The Long Beach City Council adopted the City’s Cultural Heritage Commission Ordinance (Chapter 2.63 of the Long Beach Municipal Code) in 1992. The Ordinance provides for the establishment of a Cultural Heritage Commission, sets the number of commissioners required, and establishes their qualifications and duties. It also establishes procedures for the designation of landmarks and landmark districts, and reviewing proposed work on designated landmarks or properties within landmark districts (Certificate of Appropriateness).

According to the ESMC, when considering a proposed change to a landmark or a landmark district, the Cultural Heritage Commission or, as appropriate, the Director of Development Services, shall only issue a Certificate of Appropriateness if it is determined that the proposed environmental changes:

1. Will not adversely affect any significant historical, cultural, architectural or aesthetic feature of the concerned property or of the landmark district in which it is located and that issuance of the certificate is consistent with the spirit and intent of this Chapter;
2. Will remedy any condition determined to be imminently dangerous or unsafe by the fire department or the development services department;
3. The proposed change is consistent with or compatible with the architectural period of the building;
4. The proposed change is compatible in architectural style with existing adjacent contributing structures in a historic landmark district;
5. The scale, massing, proportions, materials, colors, textures, fenestration, decorative features and details proposed are consistent with the period and/or compatible with adjacent structures; and
6. The proposed change is consistent with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings of the U.S. Department of the Interior.¹

**Bluff Park Historic Landmark District Designation Ordinance**

The Bluff Park Historic Landmark District Designation Ordinance was adopted by the City Council on December 18, 1990. The Ordinance designated the area known as Bluff Park as a Historic Landmark District and included general guidelines and standards to ensure that construction in the District preserves and enhances the area’s architectural continuity. The Ordinance also included standards and guidelines that regulate demolitions, alterations, and environmental changes to existing structures, as well as new construction or alterations.

5.1.2 ENVIRONMENTAL SETTING

HISTORICAL RESOURCES

History and Description of the Project Area

The Project site is located in the Bluff Park Historic District, which was designated by the City of Long Beach as a Landmark District in 1982 and amended in 1990. The District boundary, which is generally rectangular in shape, is formed by Broadway to the north, Ocean Boulevard to the south, Loma Avenue to the east, and Junipero Avenue to the west; refer to Exhibit 5.1-1, Map of the Bluff Park Historic District. The District encompasses approximately 109 contributing buildings and 30 full or partial City blocks. It is comprised of single- and multiple-family residences constructed between approximately 1903 and 1949. The District is characterized predominantly by large two-story Craftsman Bungalows and Period Revival style houses. Street trees are prevalent and there are minimal curb cuts for driveways. The street grid includes wide boulevards running in the east-west direction and narrower streets running north-south. Long rectangular blocks are bisected lengthwise by east-west alleys. Blocks are subdivided into residential lots that mostly face north or south onto the boulevards; smaller lots are found at the block ends, often facing east or west. The general lot layout includes front yards, paved entryways, setbacks between houses, and alley-loaded lots with garages located at the backs of lots.

The subject property at 2810 East 1st Street was designated as a contributing resource to the Bluff Park Historic District in 1982. In the immediate Project vicinity, contributing resources are also located directly adjacent to and across the street from the subject property; refer to Exhibit 5.1-2, Map of Contributing Resources. These include:

- 2800 East 1st Street (located to the west): A single-family dwelling constructed in 1920 in a minimalist Classical style;
- 2820 East 1st Street (located to the east): A 12-unit apartment building constructed in 1921 in the Mediterranean Revival style;
- 100 Temple Avenue (located to the north and across the street): A single-family dwelling constructed in 1922 in the Mediterranean Revival style;
- 2809 East 1st Street (located to the north and across the street): A single-family residence constructed in 1907 in the Shingle style; and
- 2817 E. 1st Street (located to the north and across the street): A 4-unit apartment building constructed in 1920 in the Monterey style.

HISTORY OF THE BLUFF PARK HISTORIC DISTRICT

The Bluff Park Historic District is a portion of the original Alamitos Beach Townsite, recorded by Jotham Bixby, Isaias Helman, and John Bixby in 1888 on land that was part of the Rancho Los Alamitos. The syndicate’s original intent was to attract new residents arriving by train during the land boom of the 1880s. Broadway Street was originally called “Railroad Street” because a branch of the Southern Pacific Railroad ran along the street’s alignment. The Los Angeles &
Map of Contributing Resources

100 Temple Ave.
2809 E. 1st St.
2817 E. 1st St.
2800 E. 1st St.
2810 E. 1st St.
2820 E. 1st St.

Salt Lake Railroad ran along Alamitos Avenue, to the west of the Alamitos Townsite. Growth in the tract was slow until the turn of the century. In 1902, the tract was updated with a dedicated park (later named Bixby Park) and in 1904, a new Pacific Electric right-of-way created a diagonal swath across the tract. As streetcars brought more day-tourists to the Long Beach area, more residents came to settle in Alamitos Beach, Naples, and the Long Beach Peninsula. Alamitos Beach was annexed to the City of Long Beach in 1909.

While generally gridiron in plan, the neighborhood was designed with wide east-west streets, which was a nod to the grand boulevards popularized by the emerging planners and landscape architects of the “City Beautiful” movement. Bixby Park, a donation to the City after annexation, occupied three irregular blocks in the center of the tract. Another long, narrow park located between the tract and the coastline was named “Bluff Park” and donated to the City in 1919.

The neighborhood continued to attract new residents, over the course of the early 20th century. Buyers in Alamitos Beach tended to be wealthier, working in the booming oil industry as well as medical and financial industries. After World War I, a general real estate boom swept Southern California, and many new residences, duplexes, and flats were built in the Alamitos Beach neighborhood. In 1921, the residence at 2810 was constructed in the neighborhood as part of this larger building boom. The proximity of Balboa Studios, a movie studio at 6th Street and Alamitos Avenue, attracted silent film stars to the area such as Fatty Arbuckle and Theda Bara. Reportedly, Clark Gable and Carole Lombard had their initial rendezvous in a mansion on Ocean Boulevard. In addition, Herbert Hockheimer, the president of Balboa Studios, lived in a mansion on Ocean Street.

The neighborhood remained a stable residential area until the latter half of the 20th century, when the desirability of the neighborhood’s location near the beach attracted new, denser development. After several of these development pressures resulted in demolitions in favor of condominiums and residential towers, the residents banded together to halt the destruction of the neighborhood. Their efforts resulted in the designation of the Bluff Park Historic District in 1982. In the nearly 30 years following the designation, the residents of Bluff Park Historic District have been vigilant in their efforts to preserve the neighborhood’s low-density residential character and historic sense of place.

HISTORY AND DESCRIPTION OF THE PROJECT SITE

The Project site is a typical residential property in the Bluff Park Historic District. Located near the District’s geographic center, the Project site is located on the south side of East 1st Street, between Temple and Orizaba Avenues. The subject parcel is 6,877 square feet in area. The lot size is typical of those lots in the neighborhood that are located at or near the east and west ends of blocks, which are generally smaller than lots located in the middle of the blocks. The subject property is provided automobile access via a frontloading driveway on the east side of the property. This arrangement is provided because the subject lot does not extend all the way to the alley, which provides most lots on the block with rear-loaded access. A garage is located at the property’s southeast corner. The garage has a flat roof, stucco cladding, and stucco cornice and banding that matched that on the original residence. The garage has a metal roll-up door. Landscaping at the site includes a paved walkway and grass lawns in front, and a citrus tree in the backyard.
The residence on the property is recorded by the County Assessor as 1,920 square feet of building living area. It is compact in plan, irregular in shape, with a projecting front porch and a southwest rear wing. The subject building currently lacks roof, walls, doors, and interior; refer to Exhibit 3-3, North Elevation of Project Site – Existing Condition. It consists of mostly intact wood framing on a concrete foundation. Several windows remain in their frames. The roof over the porch is partially intact, and small sections of stucco cladding remain at the porch and around the base of the building. Removed roof tiles are stored onsite.

**Architectural Description of the Intact Building**

For the purpose of conducting an analysis of the proposed restoration Project, it is appropriate to consider the subject building as it existed before work commenced in December 2005. The previously intact state of the building is described below and illustrated on Exhibit 5.1-3, North Elevation of Project Site – December 2004 Condition. The previously intact state of the building is established from photographs taken in December 2004 and from visual inspection of the existing framing and windows in February 2013.

The building at 2810 East 1st Street is a one-story single-family residence constructed in 1921 with elements of the Mission Revival style. It has a flat roof, stucco cladding, and a concrete foundation. The bottom section of stucco wall is slightly raised across the base of the building. The primary elevation contains a wide partially enclosed, shed-roof entry porch at center. The porch roof is covered in Spanish clay tile and it has exposed carved wood rafters and beams. The corners of the porch feature decorative curving buttresses, pierced by narrow eyelet openings. The sides of the porch contain arched windows. The front of the porch is a wide basket-handle-arch opening with low wing walls. It is accessed by a short rise of concrete steps with rounded corners. A landing leads to the recessed entry door at center. It is a solid wood door, covered by a metal storm door with diamond-shaped detail, flanked by large square single-light wood windows. A pair of undivided wood picture windows flanks the porch. They feature heavy label mold decorations. The front elevation terminates in a mission-style parapet broken into three sections. The side sections are flat and capped with Spanish tile. The bell-shaped middle section, located over the main entry, is higher and recessed, with sloped pier walls connecting it to the lower sections. Its face is pierced by a neat row of small, square openings below a decorative band. The middle section also features tile coping. Below the parapet, a stucco cornice runs across the façade, broken at the porch, and continues around the sides; a lighter band runs in parallel below it. A metal gate with diamond-shaped detail is located at the northeast corner of the house across the driveway.

The residence’s side elevations display stucco cladding, flat parapet rooflines with Spanish tile coping, and continuous stucco cornice and lighter band below, which are continued from the primary elevation. The east side elevation contains a three-part wood picture window at the front and a pair of windows at the back. The picture window consists of a large fixed central pane with a three-light upper band and narrow double-hung windows in the sidelights. The pair of windows includes a wood doublehung sash and a fixed single-light. At the west side elevation of the residence, the front section contains a single double-hung wood window; the back section, which jogs out, contains a band of three double-hung wood windows.

The south (rear) elevation displays the same materials and decorative features as the sides. It is divided into three bays, which project to increasing lengths from east to west. The eastern bay is narrow and contains an entry door with metal screen accessed by rounded concrete steps. The central bay is wide and contains a picture window at the east side and an identical
North Elevation of Project Site – December 2004 Condition


Exhibit 5.1-3
door with steps flanked by double-hung wood windows at the west side. The picture window is divided into two bands and six lights. The western bay is narrow and features a double-hung wood window and another identical door and steps on the in-facing wall, and a smaller square wood double-hung window at the south wall. Additional photographs of the subject building are provided in Appendix B Page 27 of this EIR.

History of the Project Site. The residence at 2810 East 1st Street was constructed in 1921. Original permits were not found for the residence. The residence may have been constructed from a pre-cut kit or readily available plans, given that a residence with a similar layout is located one street over at 2810 East 2nd Street in Long Beach (constructed 1921) and a nearly identical residence is extant at 5625 Magnolia Avenue in Riverside (constructed 1922).

The first owner and occupant of 2810 East 1st Street was Clarence O. Waterman, a physician with a practice in the First National Bank Building of downtown Fullerton. Waterman, his wife Clara, and son Wendell Waterman lived in the residence from 1922-1944. Clarence Waterman died in 1944. Wendell Waterman was a pianist who taught at the Waterman School of Modern Piano, located at 1143 East 4th Street. He graduated from the University of Southern California with honors in music in 1928.

After 1945, the house was owned by H.D. Williams, and then new owners, Robert H. and Emma Bess, moved in around 1948. After 1950, a series of renters occupied the residence through 1969. From 1960 through 2003, the property was owned by Frank and Myra Linehan, who lived in the home in 1961-1962 and in the 1970s and 1980s. The residence was reportedly rented out in the 1990s and early 2000s.

According to the records of the Department of Building and Safety, a 120-square-foot addition to the southeast wing of the residence was permitted and constructed in 1950. In October 2005, the City issued a Certificate of Appropriateness to construct a 523-square-foot rear addition. According to schematic plans approved with the permit, the proposed work also included the replacement of roof tiles and stucco cladding, the rebuilding of the parapet wall, and the modification of windows and doors and secondary elevations. Work began on December 16, 2005. However, on January 4, 2006 the City suspended work due to concerns that the work being conducted exceeded the scope of the permit. Since that time, no further work has occurred.

EVALUATION OF ELIGIBILITY

The subject building at 2810 East 1st Street appears to have been designated as a contributing resource to the Bluff Park Historic District in 1982. However, it has never been the subject of an individual historic evaluation. Furthermore, it has undergone substantial physical changes that require its historic integrity to be reevaluated. Therefore, in order to determine if the subject building is a historical resource pursuant to CEQA, it was evaluated for listing in the National Register and the California Register using the established criteria and aspects of integrity described above in the Regulatory Setting Section. The primary historic context used to evaluate the building was the historic and architectural development of the Alamitos Beach area of Long Beach during the first half of the twentieth century.
NATIONAL REGISTER OF HISTORIC PLACES

The National Register is "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment."

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of four established criteria, as outlined above in the Regulatory Setting Section above.

Criterion A. The subject property, constructed in 1921, is associated with a real estate boom that occurred in Southern California following World War I. This boom resulted in the construction of many residences in the Alamitos Beach neighborhood, as well as throughout the region. For instance, five of the six residences within the immediate vicinity of the subject property (within the study area) were constructed between 1920 and 1924. Other factors that influenced the residential development of Alamitos Beach in the early twentieth century included the establishment of streetcar lines, the incorporation of the area into Long Beach, and the development of the nearby film industry. While the subject property is broadly associated with these events and trends, it is one of many residences to be constructed during the period in Alamitos Beach and it does not have a specific association that qualifies as individually important. According to National Register Bulletin #15: "Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property’s specific association must be considered important as well." Therefore, the subject property at 2810 East 1st Street does not appear to be individually significant under National Register Criterion A.

Criterion B. The subject property is most closely associated with its original owner and occupant, physician Clarence O. Waterman, from 1922 to 1944. It is also associated with his wife Clara and his son, pianist Wendell Waterman, during the period. Neither of these individuals is known to have been influential in their profession or in the cultural development of the area or region. According to National Register Bulletin #15: "A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group." Other past owners were short-term and/or absentee until 1960, and occupants were mostly renters. From 1960 to 2003, Frank and Myra Linehan owned the property and were long-term residents during the period. None of these individuals is known to be important in history. Therefore, the subject property at 2810 East 1st Street does not appear to be individually significant under National Register Criterion B.

Criterion C. The subject property is a typical example of a small single-family residence from the period. It lacks individual importance as an example because it employs standard building practices that were used to construct many similar properties. According to National Register Bulletin #15, "A structure is eligible as a specimen of its type or period of construction if it is an important example (within its context) of building practices of a particular time in history.” The architect if any is not known; however, the hand of a master architect or craftsman is not evident in its design, and it is not likely that it represents the work of a master. It does not possess high artistic values or express a particular concept of design more fully than other examples of its type and style. It does not express an aesthetic ideal.
Criterion D. Criterion D was not considered in this report, as it generally applies to archeological resources; however, there is no reason to believe that the property has yielded or will yield information important to the prehistory or history of the local area, state, or nation.

Physical Integrity

As discussed above in the Regulatory Setting Section, the National Register recognizes seven aspects or qualities that in various combinations define integrity: feeling; association; workmanship; location; design; setting; and materials.

The subject property at 2810 East 1st Street retains its integrity of location and setting within the neighborhood. However, the property has undergone substantial physical alterations, including the removal of the roof membrane, walls, architectural detail, entry doors and several windows. The removal of these physical elements and evidence of craftsmanship have negatively affected the integrity of materials and workmanship. This in turn has negatively affected the integrity of its overall design such that its style and character are no longer evident. Consequently, the property no longer evokes the aesthetic sense, or feeling, of its historical period. Therefore, the subject property lacks integrity of materials, workmanship, design, and feeling, and it does not retain its overall integrity.

Summary of Eligibility

In conclusion, the subject property at 2810 East 1st Street is significant under National Register Criterion C as an element of a historic district that is locally designated and that appears to be eligible for listing in the National Register under Criteria C at the local level of significance. However, the subject property does not retain its historic integrity that would allow it to convey historic significance. Therefore, the subject property is not eligible for listing in the National Register because it does not retain physical integrity, which is required in addition to significance.

CALIFORNIA REGISTER OF HISTORIC PLACES

As discussed above, to be eligible for listing in the California Register, a property must be at least 50 years of age and possess significance at the local, state, or national level, under one or more of the specified criteria. The California Register criteria and eligibility standards are modeled after, and are nearly identical to, those of the National Register. Therefore, the subject property is ineligible for listing in the California Register for the same reasons outlined above in the evaluation of potential eligibility for listing in the National Register.

CITY OF LONG BEACH LANDMARKS AND LANDMARK DISTRICTS

As discussed above, the LBMC provides criteria for designation of landmarks and landmark districts. A resource may be recommended for designation as a landmark or landmark district if it manifests one or more of the specified criteria.

The subject property is currently designated as a contributing structure to the locally designated Bluff Park Historic District. It appears to qualify under: local Criterion H, as part of a distinctive area that should be preserved according to a specific architectural motif; and local Criterion I, as an established and familiar feature of a neighborhood due to specific distinguishing characteristics. A property is presumed to be historically significant if it is listed in a local
register of historical resources or has been identified as historically significant in a survey of historical resources (provided certain criteria and requirements are satisfied). However, since the time that the subject property was designated as a contributing resource, it has undergone “substantial adverse change” as defined by CEQA, which means it has experienced demolition, destruction, relocation, or alteration such that its significance is materially impaired. Although the subject property is currently designated as a contributing resource, the preponderance of evidence demonstrates that the property is not historically or culturally significant due to a loss of integrity. Therefore, it does not qualify as a historical resource pursuant to CEQA.

**ARCHAEOLOGICAL RESOURCES**

There is no reason to believe that the property has yielded or will yield information important to the prehistory or history of the local area, state, or nation, based on the following factors:

- There are no known designated archaeological resources present on the Project site;
- The site has historically been developed with a single-family residence and is surrounded by urban/developed land that has been permanently altered due to the construction of below and aboveground improvements (i.e., buildings, parking lots, hardscapes, and utilities, etc.).
- The site has already been subject to extensive disruption and may contain artificial fill materials.

Overall, given the highly disturbed condition of the site, the presence of onsite archeological resources is not anticipated.

**Sacred Lands**

Given the highly disturbed condition of the site, the presence of human remains onsite is not anticipated. Additionally, no conditions exist that suggest human remains are present.

**PALEONTOLOGICAL RESOURCES**

No unique geologic feature is present on the Project site. Given the highly disturbed condition of the site, the presence of onsite paleontological resources is not anticipated.

**5.1.3 IMPACT THRESHOLDS AND SIGNIFICANCE CRITERIA**

The purpose of this analysis is to identify any potential cultural resources within or adjacent to the project area, and to assist the Lead Agency in determining whether such resources meet the official definitions of “historical resources,” as provided in the Public Resource Code, in particular CEQA.
SIGNIFICANCE GUIDELINES

Historical Resources

Impacts to a significant cultural resource that affect characteristics that would qualify it for the NRHP or that adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines, Section 15064.5[b][1], 2000). Material impairment is defined as demolition or alteration “in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register” (CEQA Guidelines Section 15064.5[b][2][A]).

Archaeological Resources

A significant prehistoric archaeological impact would occur if grading and construction activities would result in a substantial adverse change to archaeological resources determined to be “unique” or “historic.” “Unique” resources are defined in Public Resources Code Section 21083.2; “historic” resources are defined in Public Resources Code Section 21084.1 and CEQA Guidelines Section 15126.4.

Public Resources Code Section 21083.2(g) states:

As used in this section, “unique archaeological resource” means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;

2. Has a special and particular quality, such as being the oldest of its type or the best available example of its type; or

3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Paleontological Resources

An impact on paleontological materials would be considered a significant impact if the project results in the direct or indirect destruction of a unique or important paleontological resource or site. The following criteria are used to determine whether a resource is unique or important:

- The past record of fossil recovery from the geologic unit(s);
- The recorded fossil localities in the project site;
- Observation of fossil material on-site; and
The type of fossil materials previously recovered from the geologic unit (vertebrate, invertebrate, etc.).

CEQA SIGNIFICANCE CRITERIA

The environmental analysis in this section is patterned after the Initial Study Checklist adopted by the City of Long Beach in its environmental review process, and is contained in Appendix A of this EIR. The Initial Study includes questions relating to cultural resources. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this section. Accordingly, a project may create a significant environmental impact if it causes one or more of the following to occur:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resources pursuant to Section 15064.5 (refer to Section 8.0, Effects Found Not to be Significant);
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (refer to Section 8.0); and/or
- Disturb any human remains, including those interred outside of formal cemeteries (refer to Section 8.0).

Based on these standards/criteria, the Project’s effects have been categorized as either a “less than significant impact” or a “potentially significant impact.” If a potentially significant impact cannot be reduced to a less than significant level through the application of goals, policies, standards, or mitigation, it is categorized as a significant and unavoidable impact. The standards used to evaluate the significance of impacts are often qualitative rather than quantitative because appropriate quantitative standards are either not available for many types of impacts or are not applicable for some types of projects.

5.1.4 IMPACTS AND MITIGATION MEASURES

● PROJECT IMPLEMENTATION COULD CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A HISTORICAL RESOURCE.

Impact Analysis: The Project would restore the subject single-family residence to its historic exterior appearance and character by restoring existing historic materials, features, and elements and/or reconstructing those that are no longer extant; and it would construct a new, energy-efficient interior to the residence. The Applicant proposes to reuse over 90 percent of the existing building materials located onsite. The proposed Project components are described in Section 3.0, Project Description. The proposed restoration is illustrated on Exhibit 5.1-4, North Elevation of Project Site – Proposed Condition.
SECRETARY OF THE INTERIOR’S STANDARDS

The Project has the potential to affect a historical resource, the Bluff Park Historic District. Projects that may affect historical resources are considered to be mitigated to a level of less than significant if they conform to the Secretary of the Interior’s Standards for the Treatment of Historic Properties. Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the Standards. The Standards were issued by the National Park Service. They were not intended to be prescriptive, but to “…promote responsible preservation practices that help protect our Nation’s irreplaceable cultural resources.” The Standards are accompanied by Guidelines for four types of treatments for historic buildings: Preservation; Rehabilitation; Restoration; and Reconstruction.

The Project is evaluated according to the Standards for Restoration because the Project’s goal is to accurately depict the form, features, and character of the property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.

An analysis of the project for compliance with the Standards for Restoration follows:

1. A property will be used as it was historically or be given a new use which reflects the property’s restoration period.
   
   Response: The property would be used as a residence as it was historically. Therefore, the Project complies with Standard 1.

2. Materials and features from the restoration period will be retained and preserved. The removal of materials or alteration of features, spaces, and spatial relationships that characterize the period will not be undertaken.
   
   Response: The Project would not remove any existing materials or features that characterize the historic period, except those that are so severely deteriorated that they require replacement according to Standard 6. The project would retain and preserve over 90 percent of the existing building materials located onsite, including the existing foundation, 80 percent of the existing framing, and 90 percent of the existing roof tile. The Project would also retain the form, mass, and spatial relationships of the historic residence. Therefore, the Project complies with Standard 2.

3. Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate and conserve materials and features from the restoration period will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
   
   Response: The project would stabilize and conserve existing foundation and framing by adding new foundation and structural wood and sistering them to existing elements. However, the project does not specify how the work would be physically and visually compatible upon close inspection, or how the work would be documented for future research. Therefore, the Project does not entirely comply with Standard 3.
4. Materials, features, spaces, and finishes that characterize other historical periods will be documented prior to their alteration or removal.

Response: The Project would not remove materials, features, spaces, or finishes that characterize other historical periods. The Project would retain a small rear addition that was constructed in 1950. The Project also proposes to retain existing windows that appear to be non-original. Therefore, the Project complies with Standard 4.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the restoration period will be preserved.

Response: The Project would preserve the existing foundation, framing, roof tile, and windows by restoring and reusing them to the greatest extent feasible according to Standard 6. The Project would not remove intact features or materials. Therefore, the project complies with Standard 5.

6. Deteriorated features from the restoration period will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials.

Response: The Project would repair existing deteriorated framing to the greatest extent feasible, and it would replace severely deteriorated framing with new structural wood that matches the old. However, if it is discovered that other features are severely deteriorated beyond repair, which is likely due to long-term exposure to the elements, the Project does not specify how it would replace them. Therefore, the Project does not entirely comply with Standard 6.

7. Replacement of missing features from the restoration period will be substantiated by documentary and physical evidence. A false sense of history will not be created by adding conjectural features, features from other properties, or by combining features that never existed together historically.

Response: The Project would replace missing features such as roof tiles, stucco cladding, windows, and doors with new historically compatible elements (“circa 1920s”). However, the Project does not specify how the replacement of missing features will be substantiated by documentary or physical evidence in order to avoid adding conjectural features. Therefore, the project does not entirely comply with Standard 7.

8. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

Response: The Project would chemically treat all framing for wood destroying organisms with Vikane Gas Fumigant (Sulfuryl Fluoride), which would prevent deterioration of the wood due to structure-infesting insects. However, the Project does not indicate how the chemical treatment will be undertaken using the gentlest means possible. Also, the Project does not indicate whether or not the chemical treatment would damage the wood, in addition to eradicating structure-infesting insects. Therefore, the Project does not entirely comply with Standard 8.
9. Archeological resources affected by a project will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

Response: There are no known archeological resources located on the property, nor is the Project expected to require any ground-disturbing activities that may result in the accidental discovery and/or disturbance of archeological resources, as concluded above. Therefore, the Project complies with Standard 9.

10. Designs that were never executed historically will not be constructed.

Response: Original construction plans were not found and it is not known if there are designs for the property that were never executed historically. However, the Project would restore the property based upon physical and photographic evidence of actual historic construction. Therefore, the project complies with Standard 10.

SUMMARY OF POTENTIAL PROJECT IMPACTS

The Project entails the restoration of a single-family residence at 2810 East 1St Street within the Bluff Park Historic District. The subject property was designated as a contributing structure to the District in 1982. However, previous alterations to the subject property have negatively affected its physical integrity such that it no longer conveys its significance. Therefore, the subject property does not qualify as a historical resource that could be potentially impacted by the Project. Since no historical resources will be demolished, altered, or relocated as a result of the Project, the Project would have no direct impacts on historical resources. However, the Project may have indirect impacts on historical resources. The Bluff Park Historic District constitutes a historical resource that could be visually impacted by the Project. In addition, contributing structures in the immediate vicinity of the Project site are historical resources that could be visually impacted by the Project. The setting and relationship between these resources could be negatively impacted by a project that does not accurately restore the historic character and appearance of the subject property, which could result in disruption of the architectural cohesiveness of the neighborhood.

Based on the analysis according to the Standards for Restoration, the Project is not entirely consistent with the Standards for Restoration, and therefore it could result in a substantial adverse change to the historic district and nearby contributing structures, unless mitigated. The indirect impacts the Project could have on the historical resources in the study area would be mitigated to a less than significant level through the adoption of the specified Mitigation Measures, which would ensure compliance with the Standards for Restoration. Implementation of the recommended measures would ensure that the Project complies with the Standards. Therefore, with mitigation, the Project would have a less than significant impact on the historical resources in the study area.

Mitigation Measures:

CUL-1 Qualified Preservation Professional: Prior to issuance of the Certificate of Appropriateness, the City shall require that a Preservation Professional who meets the Secretary of the Interior’s Professional Qualifications Standards in Architectural History or Historic Architecture review and approve all project plans. The City shall approve the selection of the Preservation Professional. The Preservation Professional shall operate under the direction of the Project sponsor. The City shall
not approve plans or materials related to the Project without the prior approval of the Preservation Professional.

CUL-2 Compliance to Standard 3: During construction, the Project sponsor shall work closely with the Preservation Professional to ensure that work needed to stabilize, consolidate, and/or conserve materials and features will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research. This may include visually differentiating new work from old work (e.g., window replacement), consolidating historic materials to the most important and/or visually distinctive areas (e.g., roof tile), and/or documenting the placement of historic and non-historic materials and features (e.g., framing members).

CUL-3 Compliance to Standard 6: Prior to issuance of the Certificate of Appropriateness, the Project sponsor shall work closely with the Preservation Professional to determine the extent of deterioration in existing features and the feasibility of repairing deteriorated features. Appropriate treatments for deteriorated features shall be determined according to the applicable Preservation Briefs and the Preservation Tech Notes that are provided by the National Park Service in its Technical Preservation Services. Specifically, the Project sponsor and the Preservation Professional shall investigate the existing foundation, framing, roof tiles, and windows. All treatments of deteriorated features shall be carefully documented.

CUL-4 Compliance to Standard 7: Prior to issuance of the Certificate of Appropriateness, the Project sponsor shall work closely with the Preservation Professional to determine the appropriate replacements for missing features. This shall include careful study of photographic and physical evidence of the subject building, as well as careful study of other buildings (such as 5624 Magnolia Avenue in Riverside, California) that are known to be very similar to the subject property in its intact state. Wherever possible, the Project shall include replacement of missing features with new ones that are historically compatible. In addition, the Project sponsor shall replace all existing non-original windows at the primary façade with replacements that are historically compatible with the original design of the building. All replacement features shall be carefully documented.

CUL-5 Compliance to Standard 8: Prior to issuance of the Certificate of Appropriateness, the Project sponsor shall work closely with the Preservation Professional to determine appropriate chemical and physical treatments, and to undertake them using the gentlest means possible. This shall include, but may not be limited to, treatment of a structural fumigant to eradicate structure-infesting insects.

**Level of Significance:** Less Than Significant Impact.

### 5.1.5 CUMULATIVE IMPACTS AND MITIGATION MEASURES

- **PROJECT IMPLEMENTATION COMBINED WITH CUMULATIVE PROJECTS COULD RESULT IN CUMULATIVELY CONSIDERABLE IMPACTS TO CULTURAL RESOURCES.**

**Impact Analysis:** The cumulative projects include various Historical Permits in the Bluff Park Historic District that involved: additional floor, garage, and balcony area projects; rebuild
projects; and density-affecting projects. Each cumulative project was evaluated through the City's development review process to establish compliance with the established regulatory framework (i.e., federal, state, Long Beach Municipal Code, and Bluff Park Historic District Ordinance).

Each cumulative project was also evaluated through the City’s development review process to determine whether the subject structures qualified as historical resources, and whether the proposed improvements would demolish, alter, or relocate a historical resource. The analyses concluded that the cumulative projects would result in no direct impact or less than significant direct impacts to a qualifying historical resource. Additionally, as concluded above, the Project would not demolish, alter, or relocate a historical resource, since the subject property does not qualify as a historical resource. Therefore, Project implementation would not result in cumulatively considerable direct impacts to historical resources.

Each cumulative project was also evaluated through the City’s development review process to determine whether their implementation would result in indirect impacts due to: inaccurate restoration of the historic character and appearance of the subject properties’ (i.e., potential conflicts with Secretary of the Interior’s Standards for Restoration); and disruption of the neighborhood’s architectural cohesiveness. The analyses determined no impact or less than significant indirect impacts on the area’s historical resources. As concluded above, the Project’s indirect impacts on the area’s historical resources would be mitigated to a less than significant level through the adoption of the specified Mitigation Measures, which would ensure compliance with the Standards for Restoration. Therefore, Project implementation would not result in cumulatively considerable direct impacts to historical resources.

**Mitigation Measures:** No mitigation is required.

**Level of Significance:** Less Than Significant Impact.

### 5.1.6 SIGNIFICANT UNAVOIDABLE IMPACTS

Impacts related to cultural resources associated with Project implementation are concluded to be less than significant following adherence to the recommended mitigation measures.

### 5.1.7 SOURCES CITED


