

## **5.4 Cultural Resources**

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## 5.4 CULTURAL RESOURCES

The purpose of this section is to identify cultural resources affected by the Project and to assess the significance of such resources. The analysis in this section has been prepared in accordance with *CEQA Guidelines*, Section 15064.5, which considers potential impacts on prehistoric and historic resources. Cultural resources relate to archaeological remains, historic buildings, traditional customs, tangible artifacts, historical documents, and public records that are unique or significant. Mitigation measures to avoid or lessen impacts to cultural resources are identified, as necessary. The information in this section is based on the *City of Whittier General Plan* (General Plan), the *Lincoln Specific Plan Archaeological and Paleontological Assessment Report* (Archaeological/Paleontological Report) prepared by Duke CRM, June 17, 2014, and the *Lincoln Specific Plan Historical Resource Report* (Historical Resource Report) prepared by GPA Consulting, October 2014. The Archaeological/Paleontological Report and Historical Resource Assessment are provided as [Appendix 11.6, \*Cultural Resources Reports\*](#).

The purpose of the Archaeological/Paleontological Report is to inventory any archaeological and paleontological resources and assess the potential for archaeological and paleontological resources during implementation of the Project. The Historical Resource Report provides information on the historic period built environment resources and whether Project implementation will impact these historical resources.

### 5.4.1 EXISTING ENVIRONMENTAL SETTING

#### ARCHAEOLOGICAL/PALEONTOLOGICAL SETTING

##### Paleontological Setting

Paleontological resources are plant and animal fossils dated from 3.5 million to 7,000 years ago. Typical paleontological resources include hardened remains from plants, vertebrates, or invertebrates. Paleontological resources are afforded protection by Federal, State, and County environmental laws and guidelines.

The Project location is part of the Transverse Ranges Geomorphic Province, which is an east-west trending series of mountains and valleys. The Project site sits on the Los Angeles basin, inland from the coast approximately 20 miles. It is located on alluvial sediments approximately one mile southwest of the Puente Hills. The Project site is entirely disturbed. The paleontological records search indicated that the project is underlain by Quaternary alluvium. These sediments have the potential to produce Pleistocene-aged fossils; therefore any excavation below a depth of seven feet has a potential for impacting paleontological resources.

##### Archaeological Setting

##### PREHISTORY

Archaeological resources are defined as the material remains of any area's pre-historic (aboriginal/Native American) or historic (European and Euro-American) human activity. Archaeological resources are those that are associated with prehistoric cultural sites, prehistoric isolates and the remnants of historic cultural sites that lack substantive building remnants (termed "historic archaeological sites") such as roads and trails.



Of the many chronological sequences proposed for southern California, two primary regional syntheses are commonly used in the archaeological literature. The first defines four cultural horizons for the southern California coastal province, each with characteristic local variations:

- Early Man (~9000–8500 B.P.)
- Milling Stone (8500–4000 B.P.)
- Intermediate (4000–1500 B.P.)
- Late Prehistoric (1500~200 B.P.)

A more ecological approach to the deserts of southern California, defines five periods in prehistory:

- Lake Mojave (12000–7000 B.P.)
- Pinto (7000–4000 B.P.)
- Gypsum (4000–1500 B.P.)
- Saratoga Springs (1500–800 B.P.)
- Shoshonean (800~200 B.P.)

Cultural continuity and change has been viewed in terms of various significant environmental shifts, defining the cultural ecological approach for archaeological research of the California deserts. Many changes in settlement patterns and subsistence focus are viewed as cultural adaptations to a changing environment, beginning with the gradual environmental warming in the late Pleistocene, the desiccation of the desert lakes during the early Holocene, the short return to pluvial conditions during the middle Holocene, and the general warming and drying trend, with periodic reversals, that continues to this day.

## **ETHNOGRAPHY**

The Project site is located within the boundaries of Gabrielino or Tongva Indians. The name Gabrielino was given them by the Spanish to note they were within the territory of the Mission San Gabriel. The Gabrielino are one of the least known Native American groups in California. Generally, their territory included all of the Los Angeles Basin, parts of the Santa Ana and Santa Monica Mountains, along the coast from Aliso Creek in the south to Topanga Canyon in the north, and San Clemente, San Nicolas, and Santa Catalina Islands.

The Gabrielino spoke a dialect of the Cupan group of the Takic language family. This language was part of the larger Uto-Aztecan language stock which migrated west from the Great Basin. The Gabrielino shared this language with their neighboring groups to the south and east.

Groups of Gabrielino lived in villages that were autonomous from other villages. Each village had access to hunting, collecting, and fishing areas. Villages were typically located in protected coves or canyons near water. Acorns were the most important food for the Gabrielino, although the types and quantity of different foods varied by season and locale. Other important sources of food were grass and many other seed types, deer, rabbit, jackrabbit, woodrat, mice, ground squirrels, quail, doves, ducks and other fowl, fish, shellfish, and marine mammals.

Typically women gathered and men hunted, although work tasks often overlapped. Each village had a chief who controlled religious, economic, and warfare authorities. The chief had an assistant and an advisory council who assisted in important decisions and rituals. Each of these positions was hereditary being passed down from generation to generation.



Prior to Spanish settlement of the area, in the Whittier Narrows, the Rio Hondo and San Gabriel rivers merged to create a large marshland on the northern slopes of the Puente Hills. This area was home to the *Kichireños*, a group of Gabrielino. A Gabrielino village, *'lisanchanga*, was reportedly located near the original location of Mission Vieja in the Whittier Narrows area. Another village is also known and recorded in Mission records near the Whittier Narrows, *Wiichinga*. Both of these communities are thought to be small in size, comprised of few families.

## HISTORY

Historic resources generally consist of buildings, structures, improvements, and remnants associated with a significant historic event or person(s) and/or have a historically significant style, design, or achievement. In general, resources greater than 50 years old have the potential to be considered a historic resource.

In California, the historic era is generally divided into three periods: the Spanish Period (1769 to 1821), the Mexican Period (1821 to 1848), and the American Period (1848 to present). The first Europeans in California were the Spanish. In 1542, Juan Rodriguez Cabrillo entered what was to become known as San Diego Harbor. There he met a group of Kumeyaay Indians while on shore. Over the next several hundred years there were several maritime excursions along the California coast, but it would be more than 225 years until the Spanish established a permanent settlement. In order to protect its interests, Spain sent four excursions into California, two by land and two by sea. The entire expedition was led by Captain Gaspar de Portolá, military commander of California. Portolá came through the San Gabriel Valley in 1769. To fulfill part of the goals of the expedition, Father Junípero Serra was sent to California to establish a system of Missions. In September 1771, *Mission San Gabriel Arcángel* was established in the Whittier Narrows area only to be destroyed five years later by a flood. This location is now called the *Mission Vieja* or Old Mission. In 1776, the Mission was moved north to its present location in San Gabriel. It is from here that the pueblo of Los Angeles was established.

The Project site is located on lands that were granted to Manuel Nieto in 1784 by Spanish Governor Pedro Fages. This grant was known as the *Rancho Los Nietos*; it was reportedly one of the largest in California at 300,000 acres. The Mission Padres petitioned the Governor to reduce the size of the grant and return some lands back to the Mission, especially those lands to the south. Governor Fages returned 133,000 acres back to Mission San Gabriel including the Project area which became known as the *Rancho Paso de Bartolo*. Following Mexican independence from Spain in 1821 and the eventual secularization of the Missions in 1834, Mexican Governor Jose Figueroa granted *Rancho Paso de Bartolo* to Juan Crispin Perez, who served at the Mission, in 1835. The Rancho was 10,075 acres. After Perez' death in 1847 and after the Mexican-American War former Mexican Governor Pío Pico purchased 8,991 acres of Rancho Paso de Bartolo from the heirs of Perez. Rancho Paso de Bartolo, or "El Ranchito" as he called it, was his favorite piece of land and would be the last he owned.

The City of Whittier began in the 1880s as a Quaker colony. The City is named after well-known Quaker poet John Greenleaf Whittier (who never set foot in Whittier). John H. Thomas established a ranch in the area in 1880. In 1887, Chicago resident Aquilla Pickering founded the Pickering Land and Water Company on 1,259 acres in Whittier and provided land for other Quakers to establish farms. Jonathan Bailey was made President of the Pickering Land and Water Company. The site of Whittier was laid out over 32 blocks. The area quickly became known for its production of citrus fruits and eventually walnuts. By 1888, the Southern Pacific Railroad had established a spur that reached Whittier. Pickering donated a 20-acre parcel for the development of a College which was opened in 1891 and would become known as Whittier



College. For a discussion on the history of the Nelles Facility, refer to the *Historic Resources Setting* section below.

## Archaeological/Paleontological Methods and Results

### RECORDS SEARCHES

On January 9, 2014, Duke CRM conducted a records search at the South Central Coastal Information Center (SCCIC). The SCCIC is part of the California Historical Resources Information System (CHRIS) and is located at California State University, Fullerton. The records search focused on archaeological resources. It included a review of all recorded historic and prehistoric archaeological sites within a one-mile radius of the Project site, as well as a review of known cultural resource survey and excavation reports. The California State Historic Property Data File (HPD) was examined, which includes the National Register of Historic Places (National Register or NRHR), California Register of Historical Resources (California Register or CRHR), California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI). Historical resource reports prepared for the Nelles Facility were also inspected for relevant background information, including historic maps and photos. A search was also conducted at the Los Angeles County Museum of Natural History for paleontological resources.

Map data from the SCCIC indicates that there are no archaeological resources recorded within the Project boundaries. However, there is one historical archaeological resource recorded adjacent to the northern portion of the Project. This resource, 19-008558 is a refuse scatter located near the original location of the Southern Pacific Depot. The highly fragmented and disturbed refuse was found during excavation of auger holes and 1 x 1 meter units. There is no discernable stratigraphy and historic and modern refuse are found together. Subsequent monitoring conducted later in 1991 did not identify any additional historic refuse. In total, 23 cultural resource studies were on file within one mile of the Project site. Two of these are located adjacent to the Project boundaries, but none are shown within the Project boundaries.

The Nelles Facility is recorded as a historic district with nine of the buildings mapped within the Nelles Facility. The historic built environment inventory and analysis are addressed in *Historic Resources Setting* below.

Additional historic reports (Page and Turnbull 2011, 2005; Wuellner 2005; and California Youth Authority, n.d) were reviewed, as were the following maps and aerial photos:

- Map, State Reform School, 1891 (Wuellner 2005)
- Site Plan, 1919 (Page and Turnbull 2005)
- Site Plan, 1928 (Page and Turnbull 2005)
- Aerial Photograph, 1928 (Page and Turnbull 2005)
- Site Plan, 1930 (Page and Turnbull 2005)
- Aerial Photograph, 1933 (Page and Turnbull 2005)
- Aerial Photograph, 1935 (Page and Turnbull 2005)
- Aerial Photograph, 1950s (Page and Turnbull 2005)
- Site Plan, 1951 (Page and Turnbull 2005)
- Site Plan, 1954 (Page and Turnbull 2005)
- Map, 1954 (Page and Turnbull 2005)
- Site Plan, 1961 (Page and Turnbull 2005)
- Site Plan, 1968 (Page and Turnbull 2005)
- Site Plan, 1979 (Page and Turnbull 2005)



Review of the maps and aerial photos reveals that the original layout of the State Reform School in 1891 consisted of four main buildings: the large four-story administration building in the central part of the campus, girls dormitory to the north, a trades building to the south and a barn and corral further south with lawns, gardens, and carriage roads connecting these buildings. By 1919, the original administration building is not shown on site plans, it has been replaced by a core group of school and work buildings (trades, bath house, glass house, gymnasium, power house, shops, creamery and dining hall) surrounded by the newer cottages built by Nelles. The 1928 site plan depicts several old buildings removed and many new building (new administration building, superintendent's cottage, hospital, chapel, and new trade shops). The 1928 aerial photo shows mature stands of trees throughout the campus and large orchards surrounding the campus on the south and west. The 1930 site plan shows the extant hospital and chapel (although it is labeled "kitchen and commissary"). The 1933 and 1935 are very similar to each other and to the 1930 site plan. By the 1950s several more cottages are added in the south portion of the campus and new landscaping has replaced the mature treescape that adorned the campus and orchards have been removed and replaced with open fields.

The Los Angeles County Museum of Natural History conducted a search of their vertebrate paleontological records for the project vicinity. There are no fossil localities recorded within the project boundaries. The Museum discusses three geologic units: younger Quaternary alluvium at the surface, older Quaternary alluvium beneath the surface sediments, and the Fernando Formation (Pliocene marine). The younger alluvium dates to the Holocene and postdates the fossil bearing sediments; therefore it is assigned a low potential for paleontological resources. The older alluvium dates to the earlier Pleistocene and is given rank of high potential. The Pliocene aged Fernando Formation is assigned a high potential for paleontological resources. It is not certain the depths at which each of these geologic units will be discovered. The younger alluvium is likely within the top approximately seven feet; however its bottom has not been defined. The exact depth of the contact between the younger alluvium and the older alluvium is not known at this time.

## **NATIVE AMERICAN CONSULTATION**

The Project is subject to Senate Bill 18 (SB 18) which requires local agencies to consult with California Indian Tribes and consider their comments in the planning process. The Native American Heritage Commission (NAHC) was contacted to search the Sacred Lands File (SLF) and provide a list of Native Americans to contact for the project. See Appendix B of the Archaeological/Paleontological Report ([Appendix 11.6](#) of this EIR) for details and any correspondence.

The NAHC did not identify any Native American cultural resources within or near the area of potential effect (APE) and recommended contact with four Native American groups/individuals. Four Native American groups/individuals were contacted by U.S. Postal Service Certified Mail. Two groups responded stating that the area was sensitive and recommending that a Native American monitor be present during ground disturbance associated with development of the facility. No further consultation was requested by these groups (see Appendix C of [Appendix 11.6](#)).

## **FIELD SURVEY**

On January 9, 2014, a reconnaissance level pedestrian survey was conducted by Curt Duke of Duke CRM for the Project. The reconnaissance was focused on finding areas with ground visibility to conduct an archaeological survey. Attention was given to areas of exposed soils and



locations of former buildings that have been demolished. Ground visibility was poor, less than 10 percent, due to landscape, hardscape, and buildings throughout most of the Project. No archaeological resources were observed during the field survey.

## HISTORICAL RESOURCES SETTING

### History and Description of the Project Area

The Project is located at the site of the former Fred C. Nelles Youth Correctional Facility (Nelles Facility). The Nelles Facility is the oldest juvenile detention center in California, and operated from 1891 to 2004. Extant buildings on the campus include dormitories (known as cottages), staff residences, school buildings, an auditorium, a gymnasium, and several support structures, in a variety of architectural styles including Tudor Revival, Romanesque Revival, Mid-Century Modern, and others. The property has evolved from a collection of individual cottages surrounding a central administration building into its current configuration, which is characterized by nine buildings dating from 1920 to 1934 scattered across the Project site, interspersed with more than 40 buildings from the late 1940s, 1950s, 1960s, 1980s, and 1990s; refer to [Exhibit 5.4-1, \*Nelles Facility Construction Dates\*](#).

The campus grounds are characterized by several large landscaped areas and athletic fields, which are set among a network of paths and roadways. There is a wide range of vegetation, including palms, eucalyptus, magnolia, pine, cedar, ash, orange, lemon, fig, avocado, and grapefruit trees. The Project site's athletic fields consist of a large football/soccer field surrounded by an asphalt track and a long, open, grassy field, which is divided into softball fields. Historically, the campus included a fully functioning farm, which was located in the area currently occupied by the softball fields. The majority of the paths and roadways on the Project site have been altered, although two pieces of the road network remain: a section of road running from the Visiting Control Center to the Administration Building and a section of road running from Assistant Superintendent's Residence to the Chapel.

On March 11, 1889, the Nelles Facility was established by the Act of the California Legislature as a "Reform School for Juvenile Offenders," and was dedicated by Governor R. W. Waterman on February 12, 1890. The founding of the school in Whittier followed the "boom of the eighties" in Southern California, which was characterized by rapid population growth. The location was chosen due to the 40-acre donation of land made by the Pickering Land and Water Company, which was attempting to pull the town out of the depression of 1890 and establish a financial base for the small community.

Opening on July 1, 1891, the school was intended to provide "discipline, education, employment, reformation and protection" to juvenile delinquents. The school's earliest buildings included a large barn, a conservatory, a gardener's residence, a powerhouse and trades building, a ten-room girl's cottage, and a large four-story administration building (also known as the "Castle") which contained the boy's dormitories, kitchen, chapel, and classrooms. The Richardsonian Romanesque brick and red sandstone "Castle," designed by architect Robert Brown Young, was the centerpiece of the campus and distinguished by a tall clock tower. Preston Castle at the Preston School of Industry, a reform school in Lone, northern California, was patterned after the Whittier building. The multipurpose facility was typical for its time in style and plan for educational buildings associated with schools, academies, and colleges.



Source: GPA Consulting, Lincoln Specific Plan Historical Resource Report, October 2014.

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LINCOLN SPECIFIC PLAN  
ENVIRONMENTAL IMPACT REPORT

# Nelles Facility Construction Dates

Exhibit 5.4-1



As noted above, during the early years, a fully functioning farm accompanied the complex of school buildings. The farm provided food for the institution, while also teaching the children about discipline and hard work. In addition to farm labor, the children were educated in the industrial arts or trades, such as carpentry, painting, printing, animal husbandry and dairying, tailoring, or shoemaking. This gave the children “real world” knowledge, which they could utilize back in society. In 1893, the school’s name was changed to the “Whittier State School,” due to the negative connotations associated with the word “reform.”

The main entrance to the school campus was off the County Road, which later became Whittier Boulevard. The Whittier Branch of the Southern Pacific Railroad ran along the County Road. The formal entrance to the school featured a carriage drive flanked by large flower gardens and buildings on the campus were linked by a secondary carriage drive. The property had a conservatory for propagating trees and plants for the orchard and gardens. The campus was originally characterized by an open landscape with large grass lawns in the front planted with palms and evergreens.

Over the next ten years, the school operated under its agriculture and discipline philosophy and even incorporated measures utilized by adult detention facilities. Of note was the use of the Oregon Boot, which prevented cadets from running away by shackling a 15 to 25 pound weight to one of their legs. During this time period, the school developed into a small, self-sustaining community and slowly obtained additional buildings and features, such as a pool, print shop, and trades building.

In 1912, the Board of Trustees hired Los Angeles businessman Fred C. Nelles as the Superintendent. From this point, the school became focused on a program of rehabilitation and re-socialization. Nelles’ new philosophy involved reintegrating the children into society. This was exemplified in the abolition of all forms of corporal punishment in 1913. In 1915, the Juvenile Court Act was revised to exclude boys over 16 years old. Finally in 1916, all of the girls at the school were transferred to the newly founded Ventura School for Girls, thus fulfilling Nelles’ desire for a separate institution for girls.

In addition to philosophical changes, the school underwent dramatic changes to its physical environment. In 1913, the original administration building suffered a damaging fire, and was subsequently demolished in 1920. From 1915 to 1934, the campus was redesigned and facilities were improved and expanded. The Division of Architecture and Department of Public Works were responsible for the design and construction of the campus improvements, which included administration buildings, recreational facilities, staff residences, several dormitory buildings, and support service buildings. The primary buildings were situated around a central core that was accessed by two circular drives and surrounded by a park-like landscape setting.

The resources which remain from this period of improvements include: the Superintendent’s Residence (1920, Tudor Revival); Auditorium (1923, originally a chapel, Romanesque Revival); Assistant Superintendent’s Residence (1926, French Revival Cottage); Administration Building (Tudor and Gothic Revival, 1929); Old Infirmary (1929, Tudor and Spanish Colonial Revival); Electrical Distribution Building (1930; No Style); Athletic Track and Field (c. 1930, No Style); Maintenance Garage (1931, Brick Industrial); Chapels Building (1933, originally the Kitchen and Commissary, Tudor Revival); Gymnasium (1934; Romanesque Revival); circulation elements; and ornamental trees. No dormitories or classroom buildings remained.

Overall, Nelles’ changes to the school can be characterized as humane and judicious. Renowned as his most significant achievement, Nelles instituted a cottage system, whereby the boys were separated into cottages based on age, maturity, attitude, and delinquency. Each



cottage had a married couple who served as the “house mother and father” and was made to simulate a home environment. Instead of corporal punishment, Nelles instituted a lost privilege system, in which rebellious boys and runaways lived under closer supervision and worked on tasks such as road building and ditch digging. His other major achievements at the School included the founding of the Journal of Delinquency and the recognition of the research fields of juvenile delinquency and mental retardation. In 1919, Nelles successfully introduced the first staff psychiatrist and psychologists to the School, and established a department for the study of mental defects, which would later influence the establishment of the State Bureau of Juvenile Research in 1921. Nelles also instituted clinical procedures for the evaluation of “feeble-minded” boys, who were transferred to the Sonoma State Home, as early as 1914. The introduction of these types of clinical programs at the Whittier State School represents one of the earliest by a state agency.

Fred C. Nelles’ tenure at the Whittier State School ended in 1927 with his death. He was succeeded by four superintendents: Kenyon Scudder (1927-1931); Claude S. Smith (1931); Dr. George Sabaski (1931-1933); and Judge E. J. Miline (1933-1942), all of whom continued his rehabilitation philosophy. These superintendents focused on specific programs, such as vocational arts and the development of social skills, to re-socialize and rehabilitate the boys. In addition, these superintendents furthered Nelles’ earlier aspirations for clinical programs and developmental research by acquiring adolescent psychologists and aid from the State Bureau of Juvenile Research.

In 1941, the State adopted the Youth Authority Act and established the Youth Correction Authority (California Youth Authority), which took over management of the Whittier State School in 1942. The facility was renamed the Fred C. Nelles School for Boys, in honor of its pioneering superintendent Fred C. Nelles. From the 1940s onward, the Fred C. Nelles School for Boys operated in the same capacity as other delinquency schools.

Between 1957 and 1967, the school underwent a massive building program in which new school buildings were constructed along with a series of new dormitories, program buildings, support buildings, and detention facilities. The classroom buildings took the place of earlier education buildings and were inserted in between some of the facility’s largest extant buildings, such as the Gymnasium and the Auditorium. The new dormitories, program buildings, and detention facilities took the place of earlier dormitories and open space and were located around a new U-shaped road in the southern portion of the property. It appears that most, if not all, of the 1957-1967 buildings remain on the Nelles Facility property.

The next significant building period in the facility’s history began in the late 1980s and continued into the 1990s. Many of the new buildings were modular trailers, but some were permanent structures. The new buildings were located both among the extant buildings from the earlier building programs and along the property’s perimeter. One building of note from this period is the Carter-Nixon Building, the school’s first true detention facility, which mirrored the design of adult penitentiaries. Later, the school dropped the “for Boys” portion of its name and became the Fred C. Nelles School. Soon after, the Fred C. Nelles School was renamed the Fred C. Nelles Youth Correctional Facility. In December 2004, the Project site was closed as mandated by Governor Arnold Schwarzenegger, who declared it state surplus property.

## Historic Contexts

The following relevant historic contexts were the primary contexts used to evaluate historical resources on the property under the established National Register, California Register, and



Whittier Historic Landmarks and District criteria: 1) Development of the California Juvenile Justice System; 2) the Work of Fred C. Nelles; and 3) Correctional Facility Design.

## **DEVELOPMENT OF THE CALIFORNIA JUVENILE JUSTICE SYSTEM**

The State Reform School at Marysville, established in 1860, was California's first state-run institution for the reform of juvenile offenders. It operated for eight years, until 1868, when it was closed. At that time, the 28 remaining wards from Marysville were transferred to the Industrial School at San Francisco, a city and county institution that was established in 1858 and operated until 1892. Prior to the establishment of these institutions, serious juvenile cases were sent to state prisons in San Quentin and Folsom.

An Act of the California Legislature in 1889 established two State reform schools, which were opened in 1891 as the Reform School for Juvenile Offenders in Whittier and 1892 as the Preston School of Industry in Lone. The Preston School was governed by the State Board of Prison Directors until 1893, when the Governor appointed a board of trustees to supersede the board. The Whittier School was operated by a board of trustees from inception. Female wards were housed at the Whittier School until 1913, when a separate California School for Girls was established. The reform schools operated independently until 1921, when they were placed under the jurisdiction of the Department of Institutions.

The State of California established a Juvenile Court in 1903. The early juvenile courts treated cases as civil (noncriminal) actions. Working together with the reform schools, the intent of the juvenile court was to care for and rehabilitate, rather than simply punish, juvenile offenders. This was in line with the legal doctrine of *parens patriae* ("parent of the nation"), in which the juvenile corrections system assumes the role of guardian and focuses on "the best interests of the child." In 1941, the California Youth Correction Authority Act established a state juvenile corrections agency. This legislation made California the first state to implement the American Law Institute's model Youth Correction Authority Act, which was developed and promoted by the Institute in response to reports of injustice and brutality in the existing juvenile justice system. The Act set forth the purpose of the Authority "to protect society by substituting training and treatment for retributive punishment of young persons found guilty of public offenses," and represents the first time an elected legislative body declared the purpose of juvenile corrections was rehabilitation rather than punishment.

In 1942, the state's three reform schools were moved from the Department of Institutions and placed under the Authority's jurisdiction. The agency changed its name to the California Youth Authority (CYA) in 1943. In 1944, the Prison Reorganization Act placed the CYA under the Department of Corrections, where it remained until 1953, when it became an independent department once again.

Following the model developed at the Whittier State School by Superintendent Fred C. Nelles during his tenure from 1912-1927, the CYA developed a treatment model that focused on clinical diagnosis and the development of individual treatment plans. In the first 20 years of its existence, the CYA continued in its innovations, including being the first to establish reception centers and clinics to establish treatment plans, and pioneered juvenile forestry camps, community treatment, and an inmate grievance program. These programs would be replicated by correctional agencies throughout the United States and internationally.

In the 1950s through mid-1970s, the CYA experimented with new diagnostic and treatment approaches, including guided-group interaction, therapeutic communities, group therapy, behavior modification, differential treatment, and transactional analysis. The CYA also



experimented with treating juvenile delinquents in the community rather than in its institutions through the Community Treatment Project. While some of these programs showed promising results, none were major breakthroughs and struggled against increasing public sentiment that “nothing works” in juvenile corrections.

Changes to the juvenile court system began with four Supreme Court rulings in the mid-1960s through the early 1970s. In making their arguments, the Justices questioned if juvenile courts had the resources, personnel, and facilities to fulfill their original intent of protection and reformation. They expressed concern that juveniles got the “worst of both worlds” with neither “the protections accorded to adults nor the solicitous care and regenerative treatment postulated for children.” The cumulative effect of these four decisions made juvenile court proceedings more similar to those of the criminal court by incorporating some of the rigid safeguards of “due process of law” and stepping away from the flexibility earlier juvenile courts employed in dealing with delinquency.

In the 1980s and 1990s, the CYA, like most correctional agencies in the United States, suffered from budgetary cutbacks and public disillusionment. During this time, the CYA also became increasingly focused on heavy security as opposed to its traditional emphasis on training and treatment. However, the agency did continue to operate its juvenile forestry camps and introduced the Free Venture Program, which partnered with the private sector to provide employment experience, and the Leadership, Esteem, Ability, and Discipline (LEAD) program, an intensive boot camp program based on the California National Guard’s officer training program.

In the 2000s, reports of violence among wards and between wards and officers, ward suicides, extensive lockdowns, and the use of steel mesh “cages” in classrooms made news headlines. Several lawsuits were brought against the CYA, most notably *Farrell v. Allen*, which was settled in 2004 with a consent decree that required reforms to address inhumane and illegal conditions. In a reorganization of the California corrections agencies in 2005, the CYA became the Division of Juvenile Justice (DJJ) within the Department of Corrections and Rehabilitation. At present, most youthful offenders are committed to county facilities, and the DJJ’s three remaining correctional facilities and one camp house those who have the most serious criminal backgrounds and most intense treatment needs.

### **FREDERICK C. NELLES**

Frederick C. (Fred) Nelles was born in London City, Ontario, Canada in 1876, to parents Henry E. and Anna H. (Annie) Nelles. His father, Henry, was of English Canadian decent, while his mother, Annie, was of Scottish descent. He had an older brother, Henry B., and two younger sisters: Anna E. and Cora M.

The Nelles family emigrated from Canada to the United States in 1894. The 1900 U.S. Census indicates their residence as Spring Valley, San Diego County, California. Henry, Sr., was occupied in real estate and insurance, while his son Fred was a farmer. A Naturalization Certificate issued by the Superior Court of San Diego County proves Fred became a U.S. Citizen on August 4, 1900.

By the time the 1910 U.S. Census was administered, the Nelles family was residing in the City of Los Angeles. At the time of the Census, Henry, Sr. worked as a lawyer in his own office, while Fred was a manager in a real estate office. Los Angeles City Directories indicate that Henry, Sr. and Fred co-operated The Nelles Co., an investment company, from at least 1909 to 1911, and the Gas Power Machinery Co. from at least 1911 to 1917. Henry, Sr. also co-



operated the Chelsea Green Land Co. with Fred's brother, Henry, Jr., from at least 1909 to 1915. In addition to these joint ventures, the Nelles men also had individual business pursuits, including the California Investment Co. and the San Miguel Oil and Development Co, which Henry, Sr. was associated with in 1909, and the Prudential Life Insurance Co., of which Henry, Jr. was the Southern California manager from at least 1909 to 1938.

After his business pursuits in Los Angeles, Fred was appointed superintendent of the Whittier State School in 1912. He implemented a system of individual attention coordinated with activities, academics, vocational training, and athletics. This approach, which became known as the "Nelles system," emphasized character development and training tailored to the particular needs of the child.

His approach also included a cottage system, whereby the boys were separated into cottages based on age, maturity, attitude, and delinquency. Each cottage had a married couple who served as the "house mother and father" and was made to simulate a home environment. Nelles himself approached his relationship with the wards as "father-and-son," and he resided on the premises with his own family, sisters Elizabeth and Cora. Instead of corporal punishment, Nelles instituted a lost privilege system, in which rebellious boys and runaways lived under closer supervision and worked on tasks such as road building and ditch digging. Nelles' practice was at first denounced as "visionary and impractical" by long-time staffers who were accustomed to the harsher system of strict discipline. These individuals were either discharged or resigned when not allowed by Nelles to enforce the status quo of corporal punishment.

His other major achievements included the founding of the Journal of Delinquency and the recognition of the research fields of juvenile delinquency and mental retardation. In 1919, Nelles successfully introduced the first staff psychiatrist and psychologists to the School. With these individuals, Nelles established a department for the study of mental defects, which would later influence the establishment of the State Bureau of Juvenile Research in 1921. Nelles also instituted clinical procedures for the evaluation of "feeble-minded" boys, who were transferred to the Sonoma State Home, as early as 1914. The introduction of these types of clinical programs at the Whittier State School represents one of the earliest by a state agency.

Nelles served as superintendent of the Whittier State School for 15 years until his death in 1927. About a year prior, he had suffered a physical breakdown attributed to overwork. A testament to his importance across a broad section of the population, his obituary was included in both English and Spanish in the Los Angeles Times.

## **CORRECTIONAL FACILITY PLANNING AND DESIGN**

In the 19th century, correctional facility design was largely based upon two design systems – the outside cell based upon 18th century prison design and the inside cell of the Auburn-type system. These two systems continued to be influential into the 20th century. The prototype of the outside cell design system was the prison at San Michele in Rome, created in 1704. It was a rectangular structure with outside cells arranged on three levels, each with a balcony and/or window facing the outside. The cells were arranged around a large center hall that was utilized as a chapel, dining room, and workroom.

The Auburn-type system was utilized for the first time at the Auburn prison in New York. The prison was constructed between 1817 and 1825, and became the prototype for the majority of later prison construction in America. The Auburn-type system consisted of interior, individual cells (the cellblock) stacked on multiple levels and surrounded by interior hallways. They were



completely enclosed within a building and were arranged around communal dining halls and workhouses. Buildings utilizing the Auburn-type system tended to be large and imposing. One of the most well-known examples of the system was Sing Sing Prison in New York.

The dominant systems of correctional facility construction in the United States for much of the 19th and 20th centuries consisted of the two systems described above. The Auburn-type system of stacked cells remained influential, though prison design in the 20th century continued to evolve in response to changing ideas about the rehabilitation and incarceration of prisoners. An increased emphasis on vocational training and education resulted in less restricted movement for prisoners.

In the mid-20th century, a plan called the open campus plan evolved. It was derived from 18th century hospitals and 19th century prisons in Europe. The plan was influenced by the idea that the existing standards of vocational and academic training were failing and new standards for career and educational training were necessary. Facility planners “began to focus on the inmate, his contacts with fellow inmates, and now, how these contacts might be properly structured – rather than cut off – through new architectural devices.” The result was the open campus plan, which placed less of an emphasis on security. In this plan, “cottages or dormitories along with school, dining and other service facilities might be grouped formally along a central mall [...] and rectangular-shaped cottages or cell buildings were most commonly used.” The plan began to be used in the late 1920s and early 1930s in the United States, especially for juvenile and women’s correctional facilities, though it was never as popular as other design systems. By the 1950s, the open campus plan’s usage had extended to men’s prisons, as well.

## Historical Resources Methodology

As part of the analysis of historic resources, a number of California Historical Resource Status Codes are referenced to characterize the various resources onsite and their relation to the National Register, California Register, or local criteria. The status codes are as follows:

- 1CL: Automatically listed in the California Register – Includes State Historical Landmarks 770 and above and Points of Historical Interest nominated after December 1997 and recommended for listing by the State Historic Resources Commission.
- 2S2: Individual property determined eligible for National Register by a consensus through Section 106 process. Listed in the California Register.
- 3CS: Appears eligible for California Register as an individual property through survey evaluation.
- 3S: Appears eligible for National Register as an individual property through survey evaluation.
- 5S3: Appears to be individually eligible for local listing or designation through survey evaluation.
- 6Z: Found ineligible for National Register, California Register or Local designation through survey evaluation.
- 7N: Needs to be reevaluated (Formerly National Register Status Code 4)



GPA Consulting performed the following tasks to identify historical resources and analyze Project impacts for the Historical Resource Report.

1. A field inspection of the Project site and surrounding area was conducted to determine the study area and to identify potential historical resources that might be affected by the proposed Project. The study area was identified as the Nelles Facility property. Potential historical resources that might be affected by the proposed Project were identified as the buildings, structures, objects, and landscape features that are greater than 45 years of age and that are located within the property's legal parcel boundary. A total of 41 potential historical resources were identified during the field inspection. Photographs and notes were taken during the field inspection and used to prepare the report.
2. A records search was conducted and existing documentation was reviewed to determine whether or not the property or any buildings thereon are currently listed as landmarks under any national, state, or local designation programs and whether or not they has/have been previously identified or evaluated as a historical resources. The review revealed the following:
  - a. The property as a whole is listed as California Historical Landmark #947. It is also listed in the California Register and has been formally determined eligible for the National Register. Its Status Code at the initiation of this report was 2S2: individual property determined eligible for the National Register by a consensus through Section 106 Process and listed in the California Register.
  - b. Two buildings on the property have been determined eligible for the National Register both individually and as contributors to an unidentified historic district. Their Status Codes at the initiation of this report were 2S2 (defined above) and 2D2: contributor to a district determined eligible for the National Register by a consensus through Section 106 Process and listed in the California Register.
  - c. Six buildings were evaluated previously and each assigned Status Code 4B: may become eligible for the National Register as an individual property and as a contributor to a historic district. In 2003, the 4B Status Code was eliminated and replaced with 7N: needs to be re-evaluated. Therefore, six buildings on the property had 7N Status Codes at the initiation of this report.
  - d. At least four studies of the property have been conducted since 2005. One study concluded that the property is a historic district, but it did not complete the documentation required to support this conclusion. Two studies concluded that the property does not appear to be a historic district due to a high number of non-contributing resources and a low number of contributing resources, but they also did not complete the documentation required to support their conclusions. None of these studies yielded a change in the property's Status Code or in the Status Codes of individual buildings on the property. The fourth study focused on adaptive reuse alternatives, not historical resource analyses.
  - e. No other buildings, structures, or features on the property have been previously evaluated or assigned Status Codes.
3. Property-specific research was conducted on the buildings within the Project site to determine their dates of construction, original and subsequent uses, and building



history. The property had been documented extensively prior to the preparation of this report in the CHL nomination, other preliminary historical resource reports, and various historical essays. The previous reports and histories were used as the primary source of property-specific information for the Historical Resource Report.

4. Contextual research was conducted to establish a framework for evaluating the buildings in the study area. Previous reports and historical essays adequately documented the contexts relevant to the property's pre-1934 resources and were used in the preparation of this report; however, none addressed contexts related to the property's mid-20<sup>th</sup> century history when the majority of the extant buildings were constructed. Therefore, additional research was conducted on contexts related to this later period. Sources included relevant databases, newspapers, books, magazines, and journal articles.
5. The information compiled during the field inspection and research phases was utilized to determine the best approach for evaluating the buildings on the property. Since the property consists of a significant concentration of related buildings, it was determined as the most logical approach to evaluate the property as a historic district, rather than evaluating every resource individually. Therefore, one district record was prepared for the property as a whole, and one Department of Parks and Recreation (DPR) 523A form was prepared for every resource greater than 45 years of age.

In addition, ten resources were recorded on DPR 523B forms, because they were identified as having the potential to be significant as individual resources. Two of these had been previously determined eligible for the National Register, but the documentation was incomplete. They were re-evaluated herein to bring their records up to current industry standards.

6. The components of the proposed project were analyzed to determine if they would cause a substantial adverse change to historical resources.
7. Appropriate recommended mitigation measures were developed based on the scope and degree of impact.
8. Ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation designations, assessment processes, and programs were reviewed and analyzed.

## **EVALUATIONS OF ELIGIBILITY**

The Historical Resource Report includes a historic district evaluation that identifies the Nelles Facility property as a whole, addressing multiple periods of development, including all resources greater than 45 years of age. It also includes evaluations for ten resources that were identified as having the potential to be individually significant. The following sections provide summaries of the evaluations; refer to [Appendix 11.6](#) for copies of all DPR forms with complete evaluations.

### **Historic District Evaluation**

#### **NATIONAL REGISTER OF HISTORIC PLACES EVALUATION**

The Nelles Facility property has significance as a historic district under Criteria A, B, and C for its direct association with the development of the California juvenile justice system, its direct



association with the productive life of Fred C. Nelles, and as an example of early 20th century correctional facility design, respectively; however, it does not retain sufficient integrity under any of these contexts to be eligible for listing. Due to the demolition of many buildings from the periods of significance and numerous episodes of infill construction from the late 1940s through the 1990s, if it were considered a historic district, the property would have at least 46 non-contributing resources and only nine contributing resources (see Historical Resource Report Figure 3, *Contributing and Non-contributing Resources*). The percentage of contributing resources would be only 16 percent. As a result, the property no longer retains integrity of setting, design, feeling, or association, and its workmanship and materials have been compromised. The only aspect of integrity which it retains in full is location. This alone is not enough for the property to be eligible for listing in the National Register as a historic district.

Regardless of the Nelles Facility's inability to constitute a historic district, it has been formally determined eligible as an individual resource for the National Register through the Section 106 process. Therefore, while the appropriate California Historical Resource Status Code for the Nelles Facility as a historic district is 6Z, the applicable Status Codes for the individual historical resource are 1CL and 2S2. The character-defining features of the individual historical resource include: the irregular site plan; its historical property boundary; low density of buildings; expanses of open space and lawns; vegetation dating from the periods of significance; roads and paths dating from the periods of significance; the Superintendent's Residence; Auditorium; Assistant Superintendent's Residence; Administration Building; Old Infirmary; Athletic Track and Field; Maintenance Garage; Chapels Building; and Gymnasium.

#### **INVESTIGATION OF SMALLER DISTRICTS WITHIN THE PROPERTY BOUNDARY**

Previous reports discussed the possibility of delineating smaller districts within the property boundary relating to the Nelles Facility's pre-1942 history. To investigate potential smaller districts in this report, mapping analyses were conducted utilizing the guidelines for historic districts presented in National Register Bulletin 15. The analyses did not present any reasonable way to delineate a historic district or group of historic districts, either contiguous or discontinuous, that would represent one of the periods of significance defined above. Most of the pre-1942 buildings are scattered throughout the property and their original spatial relationships have been ruined by demolition and infill construction. There are only two buildings from the periods of significance that retain their original relationship to one another: the Administration Building and the Superintendent's Residence. Two buildings do not equal a significant concentration of related buildings and are not enough to constitute a historic district.

#### **CALIFORNIA REGISTER HISTORIC DISTRICT EVALUATION**

The Nelles Facility property is not eligible for the California Register as a historic district for the same reasons outlined in the Section *National Register of Historic Places Evaluation* above. Although the enabling legislation for the CRHR does not explicitly include the same integrity language as the National Register, there is still an expectation that properties reflect their appearance from their period of significance. The Nelles Facility does not reflect its appearance from the periods of significance identified above due to extensive demolition and infill construction.

However, the property as a whole is listed in the CRHR as an individual historical resource, because it is a designated California Historic Landmark (#947) and because it has been formally determined eligible for the National Register through the Section 106 process. Therefore, while the appropriate California Historical Resource Status Code for the Nelles Facility as a historic



district is 6Z, the appropriate Status Codes for the individual historical resource are 1CL and 2S2.

### **CITY OF WHITTIER HISTORIC DISTRICT EVALUATION**

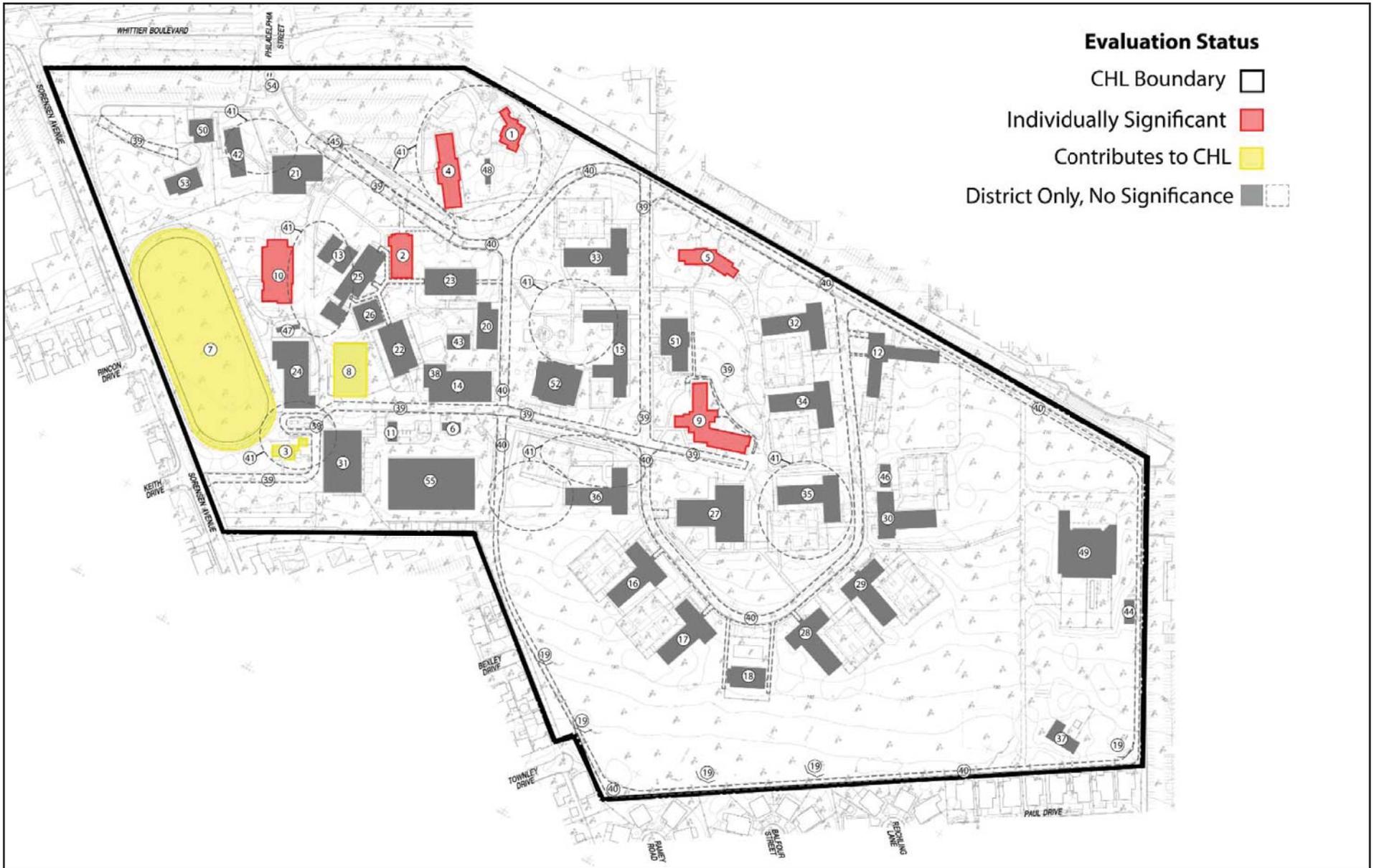
In order for the property to be eligible as a Whittier Historic District, it must consist “primarily of historic resources” (WMC, Chapter 18.84). As explained above under Section *National Register of Historic Places Evaluation*, this is not the case for the Nelles Facility. It consists of only nine historic resources out of 55 total resources. Therefore, the Nelles Facility is not eligible as a Whittier Historic District.

### **Individual Resource Evaluations**

According to the Historical Resource Report, ten resources were identified as having the potential to be eligible as individual historical resources for listing in the National and California Registers and as Whittier Landmarks; refer to Table 5.4-1, *Individual Historical Resource Evaluations*. All other resources lacked potential historic or architectural significance. They were recorded on DPR 523 A forms only as part of the historic district evaluation (refer to Historical Resource Report Table 4). The locations of the individually significant historical resources are depicted on Exhibit 5.4-2, *Individual Resource Evaluations*.

**Table 5.4-1  
Individual Historical Resource Evaluations**

Map Number <sup>1</sup>	Building Name	Year Built	Status Codes
1	Superintendent’s Residence	1920	1CL; 2S2; 5S3
2	Auditorium	1923	1CL; 3S; 3CS; 5S3
3	Assistant Superintendent’s Residence	1926	1CL
4	Administration Building	1929	1CL; 2S2; 5S3
5	Old Infirmary	1929	1CL; 3S; 3CS; 5S3
6	Electrical Distribution Building	1930	6Z
7	Athletic Track and Field	c. 1930	1CL
8	Maintenance Garage	1931	1CL
9	Chapels Building	1933	1CL; 3S; 3CS; 5S3
10	Gymnasium	1934	1CL; 3S; 3CS; 5S3
Note:			
1. The map number corresponds to <u>Exhibit 5.4-2, <i>Individual Resource Evaluations</i></u> .			
Source: GPA Consulting, <i>Lincoln Specific Plan Historical Resource Report</i> , October 2014.			



Source: GPA Consulting, *Lincoln Specific Plan Historical Resource Report*, October 2014.

NOT TO SCALE



10/14 • JN 135060

LINCOLN SPECIFIC PLAN  
ENVIRONMENTAL IMPACT REPORT

## Individual Resource Evaluations

Exhibit 5.4-2



## **SUPERINTENDENT'S RESIDENCE**

The Superintendent's Residence was evaluated previously and determined eligible for the National Register. The Historical Resource Report confirms the previous evaluation and finds the building is significant under Criteria A/1/E and B/2/B as a direct reflection of the function and importance of the Nelles Facility during its 1891-1942 period of significance and for its direct association with Fred C. Nelles as his onsite residence from 1920-1927. The building retains all seven aspects of integrity. Therefore, the Superintendent's Residence, including its landscaping, is eligible for listing in both the National and California Registers as an individual resource. It also appears to be eligible as a Whittier Landmark. In addition, the building contributes to the Nelles property's CHL designation (#947). The applicable Status Codes are 1CL, 2S2, and 5S3; refer to [Table 5.4-1](#).

The character-defining features of the historical resource include: its overall form and massing; irregular plan; steeply pitched hipped roof; steeply pitched lower gables; dormers; brick masonry exterior walls; stucco; half-timbering; main entrance configuration; fenestration pattern; wood windows; all details related to the Tudor Revival style; attached garage; interior plan of partitioned living spaces; interior features and finishes from the period of significance; immediate setting; backyard with English garden features; mature trees; and relationship to the Administration Building.

## **AUDITORIUM**

Based on the Historical Resource Report, the Auditorium appears to be significant under Criterion A/1/E as a direct reflection of the function and importance of the Nelles Facility during its period of significance. The building retains integrity of location, materials, workmanship, feeling, and association. Its setting has been compromised by nearby infill construction, and its design has been compromised by the demolition of an original conical tower, roof dormers, and part of the north wing. Despite these alterations, the Auditorium remains able to convey its association with the early history of the Nelles Facility. As a result, it appears to be eligible for listing in both the National and California Registers as an individual resource. It also appears to be eligible as a Whittier Landmark. Additionally, the building contributes to the Nelles property's CHL designation (#947). The applicable Status Codes are 1CL, 3S, 3CS, and 5S3; refer to [Table 5.4-1](#).

The character-defining features of the historical resource include: its overall form and massing; nearly rectangular plan; steeply pitched gabled roof; steeply pitched lower side-gable; clay tile roofing; stucco-clad exterior walls; arched main entrance configuration; fenestration pattern; metal-sash windows; buttresses; all details related to the Romanesque Revival style; open interior auditorium plan; exposed trusses; interior features and finishes from the period of significance; immediate setting; and mature trees.

## **ASSISTANT SUPERINTENDENT'S RESIDENCE**

The Assistant Superintendent's Residence does not appear to be significant as an individual resource under any of the established criteria. While it was present during the facility's period of significance and during the tenure of Fred C. Nelles, it was an outlying secondary building. It is, therefore, not able to adequately reflect the property's significance on its own. As a result, it does not appear to be eligible for listing in either the National or California Registers as an individual resource. Additionally, it does not appear to be eligible as a Whittier Landmark.



However, the Assistant Superintendent's Residence does contribute to the Nelles Facility property which as a whole is already listed in the California Register (CHL #947). It contributes to the property's CHL status, because it existed during the property's period of significance of 1891-1942 and it retains integrity from the period. Therefore, the building is eligible for listing in the California Register under Criteria 1 as a contributing feature of CHL #947. The applicable Status Codes is 1CL; refer to [Table 5.4-1](#).

The character-defining features of the historical resource include: its overall form and massing; nearly rectangular plan; gable-on-hip roof; lower front-gable; stucco-clad exterior walls; arched main entrance configuration; fenestration pattern; wood windows; all details related to the French Revival style; detached garage; interior plan of partitioned living spaces; interior features and finishes from the period of significance; immediate setting; grassy yards; and mature trees.

### **ADMINISTRATION BUILDING**

The Administration Building was evaluated previously and determined eligible for the National Register. The Historical Resource Report confirms the previous evaluation and finds the Administration Building is significant under Criterion A/1/E as a direct reflection of the function and importance of the Nelles Facility during its period of significance. The building retains all seven aspects of integrity. Therefore, the Administration Building, including its landscaping, is eligible for listing in both the National and California Registers as an individual resource. It also appears to be eligible as a Whittier Landmark. In addition, the building contributes to the Nelles property's CHL designation (#947). The applicable Status Codes are 1CL, 2S2, and 5S3; refer to [Table 5.4-1](#).

The character-defining features of the historical resource include: its overall form and massing; nearly rectangular plan; steeply pitched hipped roof; steeply pitched lower gables; dormers; brick masonry exterior walls; stucco and half-timbering in some locations; main entrance configuration; fenestration pattern; wood windows, many with leaded glass; decorative brickwork; all details relating to the Tudor Revival style; interior plan of double-loaded corridor with offices and reception spaces; interior features and finishes from the period of significance; immediate setting; open front lawn; mature trees; and relationship to the Superintendent's Residence.

### **OLD INFIRMARY**

According to the Historical Resource Report, the Old Infirmary appears to be significant under Criterion A/1/E as a direct reflection of the function and importance of the Nelles Facility during its period of significance. The building retains integrity of location, design, materials, workmanship, feeling, and association. Its setting has been compromised by nearby infill construction. Despite the changes in setting, the Old Infirmary remains able to convey its association with early history of the Nelles Facility. As a result, it appears to be eligible for listing in both the National and California Registers as an individual resource. It also appears to be eligible as a Whittier Landmark. Additionally, the building contributes to the Nelles property's CHL designation (#947). The applicable Status Codes are 1CL, 3S, 3CS, and 5S3; refer to [Table 5.4-1](#).

The character-defining features of the historical resource include: its overall form and massing; open V-shaped plan; steeply pitched gabled roof; clay tile roofing; Flemish stepped parapet; cast-in-place concrete walls covered with stucco; main entrance configuration; fenestration pattern; wood windows; all details relating to the blend of Tudor Revival and Spanish Colonial Revival styles; immediate setting; and open lawns.



## ELECTRICAL DISTRIBUTION BUILDING

Based on the Historical Resource Report, the Electrical Distribution Building does not appear to be significant as an individual resource under any of the established criteria. While it existed during the facility's period of significance, it is not able to adequately convey the significance of the property on its own due to its original use as a basic utility building. It was not directly related to the property's significant function as a juvenile detention facility. In addition, it has been altered by two additions. Therefore, the Electrical Distribution Building does not appear to be eligible for listing in either the National or California Registers as an individual resource. Additionally, it does not appear to be eligible as a Whittier Landmark.

The Electrical Distribution Building is part of the Nelles Facility property, which is already listed in the California Register (CHL #947); however, the building does not contribute to the property's CHL status, because it has no connection to the property's original use and because it does not retain integrity. Therefore, the Electrical Distribution Building is not eligible for listing in the California Register under Criteria 1 as a contributing feature of CHL #947. The applicable Status Codes is 6Z; refer to [Table 5.4-1](#).

## ATHLETIC TRACK AND FIELD

The Athletic Track and Field does not appear to be significant as an individual resource under any of the established criteria. While it existed during the period of significance for the Nelles Facility as a whole, it is not able to adequately convey the significance of the property on its own as a single landscape feature. Therefore, it does not appear to be eligible for listing in either the National or California Registers as an individual resource. Additionally, it does not appear to be eligible as a Whittier Landmark.

However, the Athletic Track and Field does contribute the Nelles Facility property which as a whole is already listed in the California Register (CHL #947). It contributes to the property's CHL status, because it existed during the property's period of significance and it retains sufficient integrity from the period. Therefore, the landscape feature is eligible for listing in the California Register under Criteria 1 as a contributing feature of CHL #947. The applicable Status Code is 1CL.

The character-defining features of the historical resource include: its elliptical plan; grassy field; running track; sloped and rectilinear concrete retaining walls; and relationship to the Gymnasium.

## MAINTENANCE GARAGE

Based on the Historical Resource Report, the Maintenance Garage does not appear to be significant as an individual resource under any of the established criteria. While it was present during the facility's period of significance, it was a modest support building without a direct relationship to the facility's primary function as a reform school for juvenile offenders. It is, therefore, not able to reflect the property's significance as an individual building. As a result, the Maintenance Garage does not appear to be eligible for listing in either the National or California Registers as an individual resource. Additionally, it does not appear to be eligible as a Whittier Landmark.

However, the Maintenance Garage does contribute the Nelles Facility property which as a whole is already listed in the California Register (CHL #947). It contributes to the property's CHL status, because it existed during the property's period of significance and it retains integrity



from the period. Therefore, the building is eligible for listing in the California Register under Criteria 1 as a contributing feature of CHL #947. The applicable Status Codes is 1CL; refer to [Table 5.4-1](#).

The character-defining features of the historical resource include: its overall form and massing; rectangular plan; combination of gabled and modified saw-tooth roof; clay roof tiles; brick masonry exterior walls; arched entrances; large wood folding doors; fenestration pattern; metal-sash windows; open interior spaces; exposed trusses; and interior features and finishes from the period of significance.

### **CHAPELS BUILDING**

According to the Historical Resource Report, the Chapels Building appears to be significant under Criterion A/1/E as a direct reflection of the function and importance of the Nelles Facility during its period of significance. It also appears to be significant under Criterion C/3/A and F for embodying the distinctive characteristics of the Tudor Revival style. The building retains six of the seven aspects of integrity completely. Its setting has been compromised, but not to the degree that it is unable to convey its significance under both Criterion A/1 and Criterion C/3. As a result, it appears to be eligible for listing in both the National and California Registers as an individual resource. It also appears to be eligible as a Whittier Landmark. In addition, the building contributes to the Nelles property's CHL designation (#947). The applicable Status Codes are 1CL, 3S, 3CS, and 5S3; refer to [Table 5.4-1](#).

The character-defining features of the historical resource include: its overall form and massing; nearly L-shaped plan; combination hipped and gabled roof with steep pitches; steeply pitched lower gables; dormers; brick chimney; brick masonry exterior walls; stucco and half-timbering in some locations; entrance configurations from the period of significance; fenestration pattern; wood and metal-sash windows; buttresses; all details related to the Tudor Revival style; interior plan of corridors, open chapels, and offices; interior features and finishes from the period of significance; immediate setting; open lawns; and mature trees.

### **GYMNASIUM**

The Gymnasium appears to be significant under Criteria A/1/E as a direct reflection of the function and importance of the Nelles Facility during its period of significance. The building retains integrity of location, design, materials, workmanship, feeling, and association. Its setting has been compromised by nearby infill construction, but not to a significant degree. Therefore, the Gymnasium appears to be eligible for listing in both the National and California Registers as an individual resource. It also appears to be eligible as a Whittier Landmark. In addition, the building contributes to the Nelles property's CHL designation (#947). The applicable Status Codes are 1CL, 3S, 3CS, and 5S3; refer to [Table 5.4-1](#).

The character-defining features of the historical resource include: its overall form and massing; rectangular plan; steeply pitched gabled roof; dormers; cast-in-place concrete exterior walls; arched main entrance configuration; fenestration pattern; wood and metal-sash windows; all details related to the Romanesque Revival style; open interior auditorium plan; exposed trusses; interior features and finishes from the period of significance; immediate setting; mature trees; and relationship to the Athletic Track and Field.



## 5.4.2 EXISTING 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, 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, 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.

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 would 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.

### **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 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 California Register. 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 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. Native American consultation in compliance with SB 18 was performed as part of the Archaeological/Paleontological Report. As noted above, the NAHC did not identify any Native American cultural resources within or near the APE and recommended contact with four Native American groups/individuals. Four Native American groups/individuals were contacted by U.S. Postal Service Certified Mail. Two groups responded stating that the area was sensitive and recommending that a Native American monitor be present during ground disturbance associated with development of the facility. No further consultation was requested by these groups.

### **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 WHITTIER**

### **Whittier General Plan**

City policies pertaining to cultural resources are contained in the Historic Resources Element of the Whittier General Plan. The Historic Resources Element provides guidelines for the designation and preservation of historic structures in the City. It contains a listing of structures identified by different agencies as suitable candidates for preservation, criteria for evaluating historical significance, and programs to minimize the alteration and prevent the destruction of significant structures or sites. These goals and policies provide needed direction in balancing development pressures with preservation efforts. In order to preserve the historic character of



certain neighborhoods, it is necessary that historic structures are preserved, new structures are designed to be compatible with existing architecture and the surrounding elements, and historic structures are maintained in their original form. These goals and policies include, but are not limited to, the following:

**Goal 1:** Determine the nature and extent of Whittier's physical and cultural heritage.

Policy 1.1: Identify buildings, sites, objects, neighborhoods, landscaped areas, and gardens which have special significance to the history and/ or character of Whittier.

Policy 1.2: Require investigations for new development during the environmental review to evaluate the potential for archaeological and paleontological resources.

**Goal 2:** Develop an historic resources preservation program, recognizing that effective utilization of the City's historic resources supports community identity and appeal, social and economic vitality, and neighborhood stability. Determine the nature and extent of Whittier's physical and cultural heritage.

Policy 2.3: Encourage new development near historic structures, sites or districts to be compatible with the existing significant structures in scale, material, and character. Identify buildings, sites, objects, neighborhoods, landscaped areas, and gardens.

Policy 2.4: Encourage the preservation of open areas around historic buildings.

## Whittier Municipal Code

Whittier Municipal Code (WMC) Chapter 18.84, *Historic Resources*, promotes the public health, safety, and general welfare of historic resources through the following measures:

- A. Safeguard the heritage of the city by protecting resources that reflect its cultural, historical and architectural legacy;
- B. Promote public understanding, appreciation and involvement in the unique heritage of the city;
- C. Foster civic pride in the beauty and notable accomplishments of the past;
- D. Protect and enhance the city's attractions to residents and visitors and to support and stimulate business and industry;
- E. Enhance the visual and aesthetic character of the city;
- F. Promote the use of historic resources; and
- G. Protect and safeguard the property rights of the owners whose property is declared to be a historic resource.

Article II, *Designation of Historic Landmarks and Districts* provides the designation criteria for historic landmarks and historic districts.



WMC Section 18.84.050, *Designation Criteria for Historic Landmarks* defines that a historic resource shall be designated a historic landmark if the council finds that it meets the criteria for listing on the National Register of Historic Places or the California Register of Historical Resources; or meets one or more of the following criteria:

- A. It is particularly representative of a distinct historical period, type, style, region or way of life;
- B. It is connected with someone renowned, important, or a local personality;
- C. It is connected with a use that was once common, but is now rare;
- D. It represents the work of a master builder, engineer, designer, artist, or architect whose individual genius influenced his age;
- E. It is the site of an important historic event or is associated with events that have made a meaningful contribution to the nation, state or city;
- F. It exemplifies a particular architectural style;
- G. It exemplifies the best remaining architectural type of a neighborhood;
- H. It embodies elements of outstanding attention to architectural or engineering design, detail, material or craftsmanship; or
- I. It has a unique location, singular characteristic or is an established and familiar visual feature of a neighborhood, community or the city.

WMC Section 18.84.060, *Designation Criteria for Historic Districts* states that a neighborhood consisting primarily of historic resources, or the thematic grouping of same, shall be designated a historic district if the council finds that it meets one or more of the following criteria:

- A. It meets the criteria for a historic landmark;
- B. It contributes to the architectural, historic or cultural significance of an area, being a geographically definable area possessing a concentration of historic resources or a thematically related grouping of structures which contribute to each other and are unified by plan, style or physical development; or
- C. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes or distinctive examples of a park landscape, site design or community planning.

Article III. *Certificate of Appropriateness - Economic Hardship* sets forth requirements and establishes a process to ensure that any alteration to a historic resource is in keeping with the historic character of the resource. No permit shall be issued for work on a historic resource until a Certificate of Appropriateness (COA) or waiver has been issued in accordance with the provisions of this chapter. Once a COA has been issued, the secretary shall, from time to time, inspect the work to ensure that the work complies with the approved COA.



### 5.4.3 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 onsite; 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 Whittier 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;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; and/or
- Disturb any human remains, including those interred outside of formal cemeteries (refer to Section 8.0, *Effects Found Not To Be Significant*).

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.

## 5.4.4 IMPACTS AND MITIGATION MEASURES

### ARCHAEOLOGICAL RESOURCES

- **DEVELOPMENT ASSOCIATED WITH IMPLEMENTATION OF THE PROPOSED PROJECT COULD IMPACT ARCHAEOLOGICAL RESOURCES WITHIN PROJECT SITE BOUNDARIES.**

**Impact Analysis:** The Project involves the following primary components: demolition of approximately 406,261 square feet of existing buildings associated with the former Nelles facility and existing onsite commercial use; construction of 750 DU; approximately 208,350 square feet of commercial land uses; 4.6 acres of open space; and offsite utility and roadway infrastructure improvements. The project site and surrounding area have been highly disturbed as part of development that has occurred onsite, and the project site occurs in a highly urbanized area. Based on the Archaeological/Paleontological Report, the research conducted indicates that



while no archaeological resources were identified within the Project, the fact that the Nelles Facility was constructed in 1891 and all of the original buildings were demolished in the early 1900s indicates that there is a high potential to discover buried historical archaeological resources within the Project during future ground disturbing activities within the top seven feet of the existing ground surface. This material may include agricultural items and personal items left behind by students and staff. Also, it is likely that there are trash pits and privies buried within the Project. This information would have the potential to answer questions about the early history of the Nelles Facility, a unique property type. In addition, there would likely be public interest in turn of the century items from the school that could be used for educational purposes at local museums and institutions.

There is a moderate/high potential to discover archaeological resources within seven feet in depth from the current surface during future development based on the Archaeological/Paleontological Report. Therefore, Project development could result in a potentially significant impact to archaeological resources, should there be grading activities within seven feet in depth from the current surface during future development. In order to mitigate this potential impact to less than significant, archaeological monitoring is recommended, as specified in Mitigation Measure CUL-1. Mitigation Measure CUL-1 would require that an archaeological monitor, working under the supervision of a qualified archaeologist, be present full-time during excavation within the top approximately seven feet from the current surface. If any earth removal or disturbance activities result in the discovery of archaeological resources, the monitor would temporarily halt or redirect grading efforts. The monitor would then consult with the qualified archaeologist to assess the nature and significance of the discovery. If the discovery proves to be significant, notification to the City and Project Applicant would be conducted immediately and with consultation, they would develop a mitigation plan involving salvage excavation, laboratory analysis and processing, research, curation of the find in a local museum or repository, and preparation of a report summarizing the find. Therefore, upon compliance with General Plan and WMC policies and implementation of Mitigation Measure CUL-1, impacts to archaeological resources would be less than significant.

### ***Mitigation Measures:***

CUL-1 An archaeological monitor shall be present to observe grading operations in the top seven feet in depth from the current ground surface. The monitor shall work under the direct supervision of a qualified archaeologist (Secretary of Interior Professional Qualification Standards - M.A. or M.S. in anthropology, or related discipline with an emphasis in archaeology and demonstrated experience and competence in archaeological research, fieldwork, reporting, and curation).

- The qualified archaeologist shall be onsite at the pre-construction meeting to discuss monitoring protocols.
- The archaeological monitor shall be present full-time during excavation within the top approximately seven feet from the current surface. If, after excavation begins, the qualified archaeologist determines that the sediments are not likely to produce historical archaeological resources, monitoring efforts shall be reduced.
- The monitor shall be empowered to temporarily halt or redirect grading efforts if archaeological resources are discovered.



- In the event of an archaeological discovery, the monitor shall flag the area and notify the construction crew immediately. No further disturbance in the flagged area shall occur until the qualified archaeologist has cleared the area.
- In consultation with the qualified archaeologist, the monitor shall quickly assess the nature and significance of the find. If the discovery is not significant, it shall be quickly mapped, documented, removed and the area cleared.
- If the discovery is significant, the qualified archaeologist shall notify the City of Whittier Community Development Director and Project Applicant immediately.
- In consultation with the City of Whittier Community Development Director and Project Applicant, the qualified archaeologist shall develop a plan of mitigation which will likely include salvage excavation, laboratory analysis and processing, research, curation of the find in a local museum or repository, and preparation of a report summarizing the find.

*Level of Significance:* Less Than Significant With Mitigation Incorporated.

## PALEONTOLOGICAL RESOURCES

- **DEVELOPMENT ASSOCIATED WITH IMPLEMENTATION OF THE PROPOSED PROJECT COULD IMPACT PALEONTOLOGICAL RESOURCES WITHIN THE SPECIFIC PLAN AREA.**

*Impact Analysis:* Based on the paleontological records search conducted by the Natural History Museum of Los Angeles County, there are no known fossil localities recorded within the Project boundaries. However, the paleontological records search indicated that the project contains three geologic units: younger Quaternary alluvium at the surface, older Quaternary alluvium beneath the surface sediments, and the Fernando Formation (Pliocene marine). The younger alluvium is assigned a low potential for paleontological resources as it dates to the Holocene and postdates the fossil bearing sediments. The older alluvium is assigned a high potential for paleontological resources as it dates to the earlier Pleistocene. The Pliocene aged Fernando Formation is also assigned a high potential for paleontological resources. It is not certain the depths at which each of these geologic units will be discovered. The younger alluvium is likely within the top approximately seven feet. The exact depth of the contact between the younger alluvium and the older alluvium is not known at this time.

There is a moderate/high potential to discover paleontological resources below seven feet in depth from the current surface during future ground disturbing activities based on the Archaeological/Paleontological Report. Therefore, Project development could result in a potentially significant impact to paleontological resources, should there be grading activities below seven feet in depth from the current surface during future development. In order to mitigate this potential impact to less than significant, paleontological monitoring is recommended, as specified in Mitigation Measure CUL-2. Mitigation Measure CUL-2 would require that a paleontological monitor, working under the supervision of a qualified paleontologist, be present to observe grading operations below seven feet in depth from the current surface. The qualified paleontologist shall be onsite at the pre-construction meeting to



discuss monitoring protocols. Paleontological monitoring would start at half-time. If any significant paleontological resources are discovered, the monitoring would be increased to full-time. The monitor would temporarily halt or redirect grading efforts and would then consult with the qualified paleontologist to assess the nature and significance of the discovery. If the discovery proves to be significant, notification to the City and Project Applicant would be conducted immediately and with consultation, they would develop a mitigation plan involving salvage excavation and removal of the find, removal of sediment from around the specimen (in the laboratory), research to identify and categorize the find, curation of the find in a local qualified repository, and preparation of a report summarizing the find. Therefore, impacts would be less than significant levels upon compliance with General Plan and WMC policies and implementation of Mitigation Measure CUL-2.

### ***Mitigation Measures:***

CUL-2 A paleontological monitor shall be present to observe grading operations below seven feet in depth from the current surface. The monitor shall work under the direct supervision of a qualified paleontologist (B.S. or B.A. in geology, or related discipline with an emphasis in paleontology and demonstrated experience and competence in paleontological research, fieldwork, reporting, and curation).

- The qualified paleontologist shall be onsite at the pre-construction meeting to discuss monitoring protocols.
- Paleontological monitoring shall start at half-time. If after two weeks of monitoring no paleontological resources are discovered, monitoring shall be reduced to spot-checking on a weekly basis. If significant paleontological resources are identified, then monitoring shall be increased to full-time when working in Pleistocene-aged sediments, as determined by the paleontologist or project geologist.
- The monitor shall be empowered to temporarily halt or redirect grading efforts if paleontological resources are discovered.
- In the event of a paleontological discovery, the monitor shall flag the area and notify the construction crew immediately. No further disturbance in the flagged area shall occur until the qualified paleontologist has cleared the area.
- In consultation with the qualified paleontologist, the monitor shall quickly assess the nature and significance of the find. If the specimen is not significant it shall be quickly removed and the area cleared.
- If the discovery is significant, the qualified paleontologist shall notify the City of Whittier Community Development Director and Project Applicant immediately.
- In consultation with the City of Whittier Community Development Director and the Project Applicant, the qualified paleontologist shall develop a plan of mitigation which will likely include salvage excavation and removal of the find, removal of sediment from around the specimen (in the laboratory), research to identify and categorize the find, curation of the find in a local qualified repository, and preparation of a report summarizing the find.



**Level of Significance:** Less Than Significant With Mitigation Incorporated.

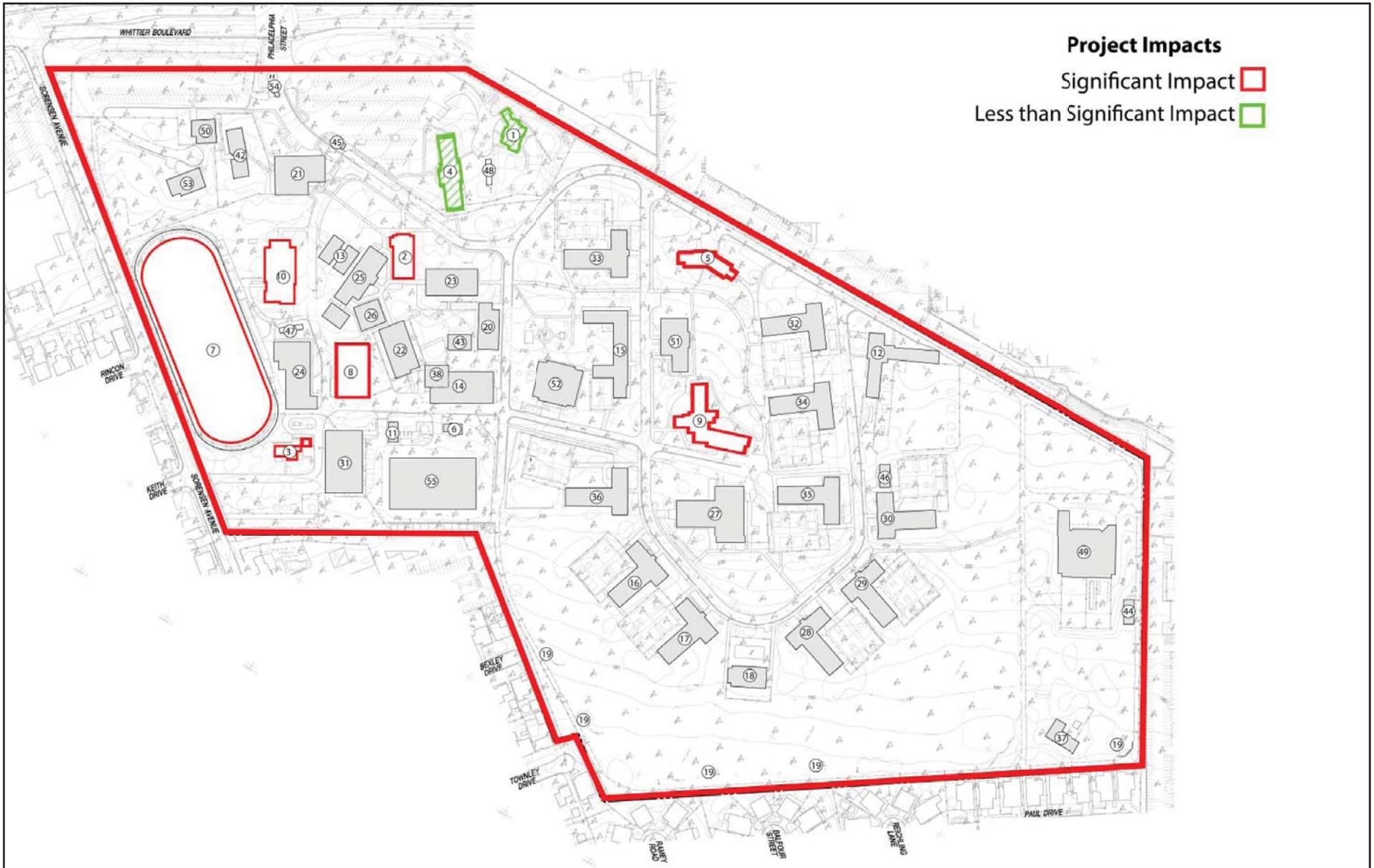
## HISTORICAL RESOURCES

- **DEVELOPMENT ASSOCIATED WITH IMPLEMENTATION OF THE PROPOSED PROJECT WOULD RESULT IN SIGNIFICANT IMPACTS HISTORICAL RESOURCES WITHIN THE PROJECT SITE.**

**Impact Analysis:** The Project consists of the demolition of 50 structures (approximately 400,156 square feet of non-operational institutional building area) associated with the former Nelles facility, and would include the adaptive reuse of the former Superintendent’s Residence and Administration Building onsite. Based on the Historical Resource Report, there are a total of ten historical resources on the Project site. The Fred C. Nelles Youth Correctional Facility is listed as California Historic Landmark #947, and it is listed in the California Register. Additionally, it was previously determined eligible for the National Register. Therefore, it is a historical resource as defined by CEQA; however, the Nelles Facility is not eligible for designation as a historic district. There are two historical resources on the property (Superintendent’s Residence and Administration Building) that were previously determined eligible for the National Register as individual historical resources and also contribute to the CHL designation; four historical resources on the property (Auditorium, Old Infirmary, Chapels Building, and Gymnasium) that both contribute to the CHL designation and appear to be individually eligible for the National, California, and Whittier Registers; and three historical resources on the property (Assistant Superintendent’s Residence, Athletic Track and Field, and Maintenance Garage) that contribute to the CHL designation only and do not appear to be individual historical resources. Therefore, there are a total of ten historical resources on the property; refer to Table 5.4-2, Historical Resources on the Project Site, and Exhibit 5.4-3, Historical Impacts. No other resources on the property appear to be eligible for designation at any level due to lack of historical significance and lack of architectural distinction. Therefore, they are not historical resources subject to CEQA.

**Table 5.4-2  
Historical Resources on the Project Site**

Map Number <sup>1</sup>	Building Name	Year Built	Status Codes
N/A	Fred C. Nelles Youth Correctional Facility	Various	1CL; 2S2; R
1	Superintendent’s Residence	1920	1CL; 2S2; 5S3
2	Auditorium	1923	1CL; 3S; 3CS; 5S3
3	Assistant Superintendent’s Residence	1926	1CL
4	Administration Building	1929	1CL; 2S2; 5S3
5	Old Infirmary	1929	1CL; 3S; 3CS; 5S3
7	Athletic Track and Field	c. 1930	1CL
8	Maintenance Garage	1931	1CL
9	Chapels Building	1933	1CL; 3S; 3CS; 5S3
10	Gymnasium	1934	1CL; 3S; 3CS; 5S3
Note:			
1. The map number corresponds to <u>Exhibit 5.4-3, Historical Impacts</u> .			
Source: GPA Consulting, <i>Lincoln Specific Plan Historical Resource Report</i> , October 2014.			



Source: GPA Consulting, Lincoln Specific Plan Historical Resource Report, October 2014.

NOT TO SCALE



10/14 • JN 135060

LINCOLN SPECIFIC PLAN  
 ENVIRONMENTAL IMPACT REPORT  
**Historical Impacts**

**Exhibit 5.4-3**



Based on the Vesting Tentative Tract Map for the proposed Project, known changes in the vicinity of the Superintendent's Residence and Administration Building would be limited to the introduction of a new two-way road between the buildings and associated landscaping (refer to Exhibit 3-8). As setting is one of the seven aspects of integrity defined by the National Register program, the new road and landscaping would alter the buildings' settings.

Under CEQA, the changes to each building's setting would only cause a substantial adverse change if they would materially impair the historical resource's ability to convey its significance to the degree that it would no longer be eligible for inclusion in the California Register. While the plans for the new road and landscaping are preliminary, it is unlikely that they would impair each historical resource's ability to convey its significance to such a degree. The Administration Building would retain its front lawn and associated landscaping, which are character-defining features of its setting. Likewise, the Superintendent's Residence would retain both its front and back lawns and associated landscaping, character-defining features of its setting. The relationship between the two buildings and their larger settings would be altered, but this would not impact each building's ability to convey its significance as an individual historical resource. Each would still retain integrity of location, design, materials, workmanship, feeling, and association. Each would remain eligible for the National and California Registers and as City of Whittier Landmarks. Therefore, of the ten total historical resources on the Project site, the implementation of the proposed Specific Plan would have less than significant impacts on the former Superintendent's Residence and Administration Building. However, Project development would result in a potentially significant impact to historical resources on the remaining eight historical resources as outlined in Table 5.4-2.

In order to minimize these potential impacts to historical resources, the Project includes Mitigation Measure CUL-3, which would require retaining and rehabilitating the Chapels Building and relocating and rehabilitating the Assistant Superintendent's Residence. Mitigation Measure CUL-3 would also require recordation of affected resources, documentation, photography/media, an interpretive program, and commemorative signage (among other requirements) with the intent of educating the public regarding the affected resources at the Nelles facility and providing a memory and understanding of the resources after their removal. None of the proposed measures in Mitigation Measure CUL-3, either alone or in combination, would mitigate impacts to all historical resources to a level of less than significant. Upon implementation of Mitigation Measure CUL-3, impacts to the 10 identified onsite historic resources are as follows:

- Superintendent's Residence and Administration Building: As noted above, with retention and rehabilitation of these two buildings, the Project would have less than significant impacts on the Superintendent's Residence and Administration Building.
- Chapels Building: With the requirement to retain and rehabilitate the Chapels Building under Mitigation Measure CUL-3, the Project would have a less than significant impact on the Chapels Building.
- Auditorium, Old Infirmary, Athletic Track and Field, Maintenance Garage, and Gymnasium: The Project would result in the demolition of these five resources. With the historic characteristics associated with these five resources described above, impacts to these resources would represent a significant and unavoidable impact.
- Fred C. Nelles Youth Correctional Facility: The Project would have a negative impact on the Nelles Facility as an individual historical resource which is listed in the California Register as a CHL and for a formal determination of National Register eligibility. It would



materially impair the historical resource’s significance through demolition and alteration. Despite the adaptive reuse of a total of four historic buildings, reducing impacts to less than significant would be unlikely given the demolition that would occur and the development proposed onsite. Site-specific Project plans would have to be carefully analyzed to determine the extent of impacts and the property as a whole would have to be re-evaluated for California Register eligibility once the Project was complete. Since the Historical Resource Report identified that a significant impact to the Nelles Facility as an individual historic resource is likely, this analysis assumes that a significant and unavoidable impact would occur to this resource.

- ***Assistant Superintendent’s Residence:*** With the requirement under Mitigation Measure CUL-3 to relocate and rehabilitate the Assistant Superintendent’s Residence, impacts to this resource would be reduced. However, the precise location for placement of the residence and the context of surrounding development have not been determined. Thus, similar to the Nelles Facility, site-specific Project plans would have to be carefully analyzed to determine the extent of impacts on the residence once it has been relocated and rehabilitated. Since the Historical Resource Report identified that a significant impact to the Assistant Superintendent’s Residence is likely, this analysis assumes that a significant and unavoidable impact would occur to this resource.

As a result, even upon compliance with General Plan and WMC policies and implementation of Mitigation Measure CUL-3, the proposed Project would have significant and unavoidable impacts on seven historical resources and less than significant impacts on three historical resources; refer to Table 5.4-3, *Impacts to Historical Resources*, which provides a summary of impacts after implementation of Mitigation Measure CUL-3.

**Table 5.4-3  
Impacts to Historical Resources**

Map #	Name	Status Codes	Significant Impact
N/A	Fred C. Nelles Youth Correctional Facility	1CL; 2S2; 5S3	<b>Yes</b>
1	Superintendent’s Residence	1CL; 2S2; 5S3	No
2	Auditorium	1CL; 3S; 3CS; 5S3	<b>Yes</b>
3	Assistant Superintendent’s Residence	1CL	<b>Yes</b>
4	Administration Building	1CL; 2S2; 5S3	No
5	Old Infirmary	1CL; 3S; 3CS; 5S3	<b>Yes</b>
7	Athletic Track and Field	1CL	<b>Yes</b>
8	Maintenance Garage	1CL	<b>Yes</b>
9	Chapels Building	1CL; 3S; 3CS; 5S3	No
10	Gymnasium	1CL; 3S; 3CS; 5S3	<b>Yes</b>
Notes:			
1. The map number corresponds to <u>Exhibit 5.4-3, <i>Historical Impacts</i></u> .			
2. The table takes into consideration Mitigation Measure CUL-3, which would require adaptive reuse of the Chapels Building and Assistant Superintendent’s Residence.			
Source: GPA Consulting, <i>Lincoln Specific Plan Historical Resource Report</i> , October 2014.			

It should be noted that Mitigation Measure CUL-3 includes an extensive range of requirements to minimize historical impacts, such as the retention of resources, recordation, commemoration, rehabilitation, and salvage/reuse. As part of preparation of the EIR for this Project, a *Reuse Feasibility Study* (refer to Appendix 11.17, *Reuse Feasibility Study*) was prepared that explored



the potential for additional adaptive reuse, onsite relocation of historic buildings, and offsite relocation of historic buildings. Based on the study, these potential mitigation options were determined to be infeasible (for additional detail, refer to Section 7.0, *Alternatives to the Proposed Project* and Appendix 11.17). Although the Reuse Feasibility Study determined that relocation of the Assistant Superintendent's Residence was infeasible from an economic perspective, the Assistant Superintendent's Residence is a wood-framed structure that more easily provides for relocation, and avoids the need for substantial seismic bracing/structural separation and potential safety hazards that may occur during moving. As such, the City has included a requirement for the relocation and rehabilitation of this building as part of Mitigation Measure CUL-3.

## HISTORIC TREES

As noted in Section 5.9, *Land Use and Planning*, the City's known historic resources have been identified in the Historic Resources Element Background Report (Background Report). The Background Report identifies the City's exceptional trees, which are considered significant due to age, historical/cultural value, and aesthetic quality, among other factors. These trees are listed in Background Report Table 9 and illustrated in Background Report Exhibit 9-2. According to in Background Report Table 9 and Exhibit 9-2, two trees have been identified within Project site boundaries, including one Banyan fig tree (planted in 1904) and one silk oak (planted in 1900). The City's designation of exceptional trees is based upon a report entitled "Exceptional Trees of Los Angeles," prepared by Donald R. Hodel in 1988.

Neither the City's Background Report nor the Exceptional Trees of Los Angeles report note the specific location of either of these two trees on the Project site. However, based upon the *Fred Nelles School Tree Evaluation* (Tree Evaluation) prepared for the proposed Project (refer to Appendix 11.3, *Tree Evaluation*), there are no Banyan fig trees that exist on the Project site. It is assumed that the Banyan fig cited in the Exceptional Trees of Los Angeles report was removed since the report was prepared in 1988. In addition, the Tree Evaluation indicates that there are a total of four silk oak trees existing on the Project site. Three of the four silk oaks were determined to have declining structural health, most likely due to a lack of irrigation and maintenance since the Nelles facility ceased operations. The fourth silk oak was determined to be of good health and average structure, but due to long limb lengths, is considered a safety risk if left in place. As the exceptional trees designated by the City on the Nelles site either no longer exist, are in declining structural health, or represent a safety risk, impacts in this regard are considered less than significant.

### ***Mitigation Measures:***

CUL-3 Mitigation requirements associated with Mitigation Measure CUL-3 shall consist of the following:

#### Mitigation Measures For Impacts To The Nelles Facility As A Whole

Mitigation for demolishing multiple historical resources on the Fred C. Nelles Youth Correctional Facility property shall include all of the following stipulations. While Stipulation B1, third party sale and relocation offsite, could potentially mitigate impacts to a level of less than significant for some of the historical resources on the property, none of the mitigation measures, either alone or in combination, is likely to mitigate impacts to the Nelles Facility property as a whole to a level of less than significant.



A. Retention

1. Project developer shall retain the Chapels Building in situ to offset the losses of other buildings which would be more costly and/or unreasonable to retain in place based on current project plans and feasibility studies. This would mitigate impacts to the Chapels Building to a level of less than significant, but not the Nelles Facility as a whole.
2. Project developer shall relocate the Assistant Superintendent's Residence to a compatible location onsite to offset the losses of other buildings which would be more costly and/or unreasonable to retain in place or relocate onsite based on current project plans and feasibility studies. This would lessen impacts to the Nelles Facility as a whole, but not necessarily to a level of less than significant.

B. Third Party Sale

1. Project developer shall offer historic buildings scheduled for demolition to the public for sale and relocation off-site by a third party:
  - a. Buildings to be offered include:
    - i. Auditorium
    - ii. Old Infirmary
    - iii. Maintenance Garage
    - iv. Gymnasium
  - b. Shall be advertised by the project developer in the following locations
    - i. Project developer's website
    - ii. City's website
    - iii. Los Angeles Times website and print editions
    - iv. Whittier Daily News
    - v. National Trust for Historic Preservation magazine and website
  - c. Bidding period shall remain open for 60 days after the date of advertisement to allow adequate response time from interested parties.
  - d. Qualified parties shall meet the following minimum qualifications to be considered realistic buyer:
    - i. Possess adequate financial resources to relocate and rehabilitate the buildings
    - ii. Possess an available location for the buildings
    - iii. Provide for a new use for the buildings
  - e. City shall approve qualified buyer.

C. Recordation

1. Project developer shall create Historic American Buildings Survey (HABS)-like Level II documentation prepared according to the Secretary of the



Interior's Standards and Guidelines for Architectural and Engineering Documentation. Information on the Standards and Guidelines is available at the following links:

- [http://www.nps.gov/history/local-law/arch\\_stnds\\_6.htm](http://www.nps.gov/history/local-law/arch_stnds_6.htm); and
  - <http://www.nps.gov/history/hdp/standards/index.htm>.
- a. Photographs: photographs with large-format (4x5 or larger), black and white negatives of the property as a whole; photocopies with large format negatives of select existing drawings, site plans, or historic views where available.
    - i. Minimum of 12 views showing context and relationship of historical resources to each other; must include aerial views showing the whole property.
  - b. Written data: written historical descriptive data, index to photographs, and photo key plan.
  - c. Shall be created by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards with demonstrated experience in creating HABS Level II documentation.
  - d. Shall be created prior to any demolition or relocation work.
  - e. Shall be distributed to the following repositories for use by future researchers and educators. Before submitting any documents, each repository must be contacted to ensure that they are willing and able to accept the items:
    - i. Whittier Public Library
    - ii. Whittier Historical Society and Museum
    - iii. Los Angeles Public Library
    - iv. California State Library, Sacramento
    - v. South Central Coastal Information Center at CSU Fullerton
    - vi. State Office of Historic Preservation
  - f. Shall be made available on the interactive website described below under Stipulation D3.
2. Project developer shall archive artifacts found on-site prior to relocation or demolition.
    - a. Every effort shall be made to archive historic artifacts stored within all buildings scheduled for demolition or relocation prior to any work.
    - b. Found artifacts shall be cataloged and stored according to best archival practices.
    - c. Found artifacts shall be offered to the Whittier Historical Society and Museum for use in its collection. Before submitting any artifacts, the repository must be contacted to ensure that they are willing and able to



accept the items. If the historical society is not able to accept the artifacts, the Whittier Public Library must be contacted to see if they are willing and able to accept the items.

- d. Shall be performed by a qualified curator of historical artifacts with demonstrated experience in archival techniques and procedures.
  - e. Artifacts may include, but are not necessarily limited to:
    - i. Manuscripts
    - ii. Maps
    - iii. Logs
    - iv. Journals
    - v. Personnel files
    - vi. Other documents pertaining to the history and operations of the site
3. Project developer shall record oral histories designed to address multiple themes and time periods.
- a. Shall include interviews with the following if available:
    - i. Former superintendents
    - ii. Former facility staff members
    - iii. Former inmates
    - iv. City staff
    - v. Members of the Whittier community
    - vi. Persons related to Fred C. Nelles or with special knowledge of his life and work
    - vii. Experts on the site, such as authors, historians, and biographers
    - viii. Experts on the California correctional system, such as high-ranking officials, authors, historians, and biographers
  - b. Shall include people related to the site from a variety of time periods, not just the most recent period. Every effort should be made to identify people from the earliest periods possible, those who would have special knowledge of the buildings being demolished, and those with detailed knowledge of the site, its operations, and its history.
  - c. Shall be video-recorded, so they can be incorporated into the documentary film described below under Stipulation C6 below.
  - d. Shall be made available on the interactive website described below under Stipulation D3.
  - e. Shall be conducted by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards with demonstrated experience with conducting oral histories for the purposes of creating broadcast-quality documentaries and archival records.
  - f. Shall be recorded by a qualified filmmaker with demonstrated experience in producing broadcast-quality documentaries.



4. Project developer shall create a documentary film about the history and significance of the site.
  - a. Shall address each of the following themes:
    - i. General site history
    - ii. Work of Fred C. Nelles
    - iii. Unique rehabilitation programs
    - iv. Education
    - v. Job training
    - vi. Athletics
    - vii. Agriculture
    - viii. Religious life
    - ix. Innovations in site planning
    - x. Architecture
    - xi. Role of the site within the larger theme of the California correctional system
    - xii. Role of the site within the history of Whittier
  - b. Shall be broadcast-quality. It shall utilize modern filmmaking technology, a professional script, a professional score, and professional actors.
  - c. Shall be created by a qualified filmmaker with demonstrated experience in producing broadcast-quality documentaries.
  - d. Present-day footage shall be created prior to relocation or demolition work.
  - e. Shall utilize oral histories and building-specific video shorts created for individual building mitigation discussed later in this document.
  - f. Shall be made available in downloadable format on the interactive website described below Stipulation D3.
  - g. Shall be produced in DVD format and distributed to the following repositories. Before submitting any DVDs, each repository must be contacted to ensure that they are willing and able to accept the items:
    - i. Whittier Public Library
    - ii. Whittier Historical Society and Museum
    - iii. Los Angeles Public Library
    - iv. California State Library, Sacramento

#### D. Interpretation

1. Project developer shall implement an Interpretation program throughout the site.
  - a. Project developer shall install at least six (6) or more permanent, on-site, educational displays about the history of the site and its significance. More displays throughout the property may be necessary as the interpretation program shall address the following topics and themes:



- i. General site history
    - ii. Work of Fred C. Nelles
    - iii. Unique rehabilitation programs
      1. Education/job training
      2. Athletics
      3. Agriculture
      4. Psychology
    - iv. Architecture
    - v. Role of the site within the larger theme of the California correctional system
    - vi. Role of the site within the history of Whittier
  - b. Shall be museum-quality.
  - c. Shall be located either along the bike/pedestrian trail or in another park space with the greatest anticipated number of visitors, so it will have the greatest visibility and availability to the public.
  - d. Shall be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards with demonstrated experience creating museum-quality interpretation programs.
  - e. Shall be approved by the City.
  - f. Shall be created and installed as part of the overall construction schedule for the project, prior to the opening of the location to the public.
  - g. Content created for the display shall be utilized to create the interactive website described under Stipulation D3.
2. Project developer shall create an Interpretation program off-site.
  - a. Project developer shall create two (2) educational displays, one for each of the following locations. Before submitting any displays, each repository must be contacted to ensure that they are willing and able to accept the items:
    - i. Whittier Public Library
    - ii. Whittier Historical Society and Museum
  - b. Shall address the following topics and themes at minimum:
    - i. General site history
    - ii. Work of Fred C. Nelles
    - iii. Role of the site within the larger theme of the California correctional system
    - iv. Role of the site within the history of Whittier
  - c. Shall be museum-quality.
  - d. Shall be portable and reproducible, such as high-quality framed posters.



- e. The same display may be created for both locations and duplicated.
  - f. Shall be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards with demonstrated experience creating museum-quality interpretation programs.
  - g. Shall be approved by the City.
  - h. Shall be created and installed as part of the overall construction schedule for the project, prior to the opening to the public.
3. Project developer shall create an interactive website centralizing all documentation, educational materials, and videos.
- a. Shall be commercial-quality.
  - b. Shall address the following themes:
    - i. General site history
    - ii. Work of Fred C. Nelles
    - iii. Unique rehabilitation programs
    - iv. Education
    - v. Job training
    - vi. Athletics
    - vii. Agriculture
    - viii. Innovations in site planning
    - ix. Architecture
    - x. Role of the site within the larger theme of the California correctional system
    - xi. Role of the site within the history of Whittier
  - c. Shall include information on all demolished historical resources, as well as those retained as part of the project.
  - d. May include audio and video clips.
  - e. Shall be prepared by the following:
    - i. A historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards
    - ii. Qualified graphic designer with demonstrated experience in website design
    - iii. Qualified website developer with demonstrated experience in commercial-quality website creation
    - iv. Shall be approved by the City.
  - f. Shall be made accessible via basic Google searches and through links on the following websites. The administrators of the websites must be contacted to ensure that they are willing and able to accept the links:
    - i. Whittier Public Library



- ii. Whittier Historical Society and Museum
  - iii. City of Whittier
- g. Shall be created and launched as part of the overall construction schedule for the project, prior to the opening of the site to the public.
4. Project developer, in consultation with the City, shall implement a sign program visually linking the site to its past.
- a. Shall include the development of a logo based on the history of the site. Examples of sources for the logo include:
    - i. Silhouette(s) of historic building(s)
    - ii. Historic seal
    - iii. Fonts used on historic letterhead or other official documents
    - iv. Colors used on historic seals, letterhead, uniforms, etc.
  - b. Logo shall be incorporated on street signs, park signs, and building signs throughout the site.
  - c. Shall be created by a qualified graphic designer with demonstrated experience in logo design.
  - d. Shall be created and installed as part of the overall construction schedule for the project, prior to the opening of the location to the public.
  - e. Shall be approved by the City.
- E. Commemoration
- 1. Project developer shall install plaques on remaining buildings.
    - a. Project developer shall install plaques on the following buildings:
      - i. Administration Building
      - ii. Superintendent's Residence
      - iii. Chapels Building
      - iv. Assistant Superintendent's Residence
    - b. Shall include one (1) plaque per building.
    - c. Shall be located near the subject building's main entrance.
    - d. Shall provide a brief narrative on history and significance of the subject building.
    - e. Shall be of sufficient size to tell the story of the subject building in a readable font size.
    - f. Shall be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards with demonstrated experience with writing plaque language.



- g. Shall be approved by the City.
- h. Shall be created and installed as part of the overall construction schedule for the project, prior to the opening of the site to the public.
2. Project developer, in consultation with the City, shall implement a naming program throughout the site.
  - a. Project developer shall utilize the names of historic buildings, persons, and activities associated with the site.
    - i. Examples include Fred C. Nelles Blvd, Chapels Park, etc.
  - b. Scope of the program shall be determined by the City.
  - c. May include naming parks, streets, benches, picnic areas, pools, clubhouses, and other community spaces.
  - d. Shall be approved by the City.
  - e. Shall be created and implemented as part of the overall construction schedule for the project, prior to the opening of the site to the public.
3. Project developer, in consultation with the City, shall implement a public art program throughout the site.
  - a. May include murals, sculptures, fountains, and other permanent art installations.
  - b. Scope of the program shall be determined by the City.
  - c. Shall interpret the history of the site and relevant themes.
  - d. Artwork shall be created by qualified artists with demonstrated public art experience.
  - e. Shall be approved by the City.
  - f. Shall be created and implemented as part of the overall construction schedule for the project, prior to the opening of the site to the public.

#### F. Rehabilitation

1. Project developer shall rehabilitate the Administration Building, Superintendent's Residence, Chapels Building, and Assistant Superintendent's Residence according to the Secretary of the Interior's Standards for Rehabilitation.
  - a. A detailed character-defining features analysis and historical resource treatment plan shall be prepared for each historical resource by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards. The analysis and treatment plan



shall be submitted to the project architect prior to the development of project plans.

- b. Plans for rehabilitation shall be created by a licensed architect with historic preservation experience.
- c. Plans shall be reviewed in the schematic design phase, prior to any construction work, as well as in the 50% and 90% construction documents phases for compliance with the Standards by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards with demonstrated experience with Standards compliance reviews.
- d. Reviewer shall create a technical memo at each phase and submit to the City for concurrence.
- e. Construction monitoring shall be performed by a qualified historic preservation professional at key milestones to ensure the work complies with the Standards. The milestones shall be agreed upon in advance by the project team.
- f. Finished rehabilitation shall be reviewed in person by City staff and by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards with demonstrated experience with Standards compliance reviews.
- g. In the event that the buildings are leased to third-party tenants and tenant improvements will be made, all of the terms of this stipulation [F(1)(a) – F(1)(g)] shall be disclosed in the lease agreements, agreed upon in writing, and mutually enforced by the project developer and the City. The tenants shall not be permitted to conduct work that does not comply with the Standards.

#### Mitigation Measures For Impacts To Individually Eligible Historical Resources

Mitigation for impacts to all individually eligible historical resources shall include the following stipulations, in addition to those stipulated above for the Nelles Facility as a whole. The individually eligible historical resources impacted by the Project as currently proposed include: the Auditorium, the Old Infirmary, the Gymnasiums, and the Chapels Building. If the Chapels Building is rehabilitated according to the Standards, as recommended above, then the following would only apply to the other three individual historical resources. None of these mitigation measures, either alone or in combination, will mitigate impacts to the historical resource to a level of less than significant.



A. Recordation<sup>1</sup>

1. Project developer shall create HABS-like Level II documentation prepared according to the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation.
  - a. Photographs: photographs with large-format (4x5 or larger), black and white negatives of the building; photocopies with large format negatives of select existing drawings, site plans, or historic views where available.
    - i. Minimum of 12 views showing context, cardinal directions, details, and interiors.
  - b. Written data: written historical descriptive data, index to photographs, and photo key plan.
  - c. Shall be created by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards with demonstrated experience in creating HABS Level II documentation.
  - d. Shall be created prior to any demolition or relocation work.
  - e. Shall be distributed to the following repositories for use by future researchers and educators. Before submitting any documents, each repository must be contacted to ensure that they are willing and able to accept the items:
    - i. Whittier Public Library
    - ii. Whittier Historical Society and Museum
    - iii. Los Angeles Public Library
    - iv. California State Library, Sacramento
    - v. South Central Coastal Information Center at CSU Fullerton
    - vi. State Office of Historic Preservation
  - f. Shall be made available on the interactive website described under Stipulation D3 for the mitigating impacts to the Nelles Facility as a whole.
2. Project developer shall archive artifacts found on-site prior to demolition or relocation per the requirements set forth in Stipulation C2 for mitigating impacts to the Nelles property as a whole.
3. Project developer shall create a short video clip about the history of the building, its use, and its importance as part of the rehabilitation facility.
  - a. Shall be broadcast-quality.
  - b. Shall be created by a qualified filmmaker with demonstrated experience in producing broadcast-quality documentaries.

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<sup>1</sup> All interior recordation of the Old Infirmary shall depend on the safety of the conditions. The presence of hazardous materials may prevent extensive interior recordation.



- c. Present-day footage shall be created prior to any demolition or relocation work.
- d. Shall be incorporated into the documentary film in Stipulation C4 for mitigating impacts to the Nelles property as a whole.
- e. Shall be made available on the interactive website set forth in Stipulation D3 for mitigating impacts to the Nelles property as a whole.
- f. May utilize oral histories in Stipulation C3 for mitigating impacts to the Nelles property as a whole.

#### B. Interpretation

1. Dedicate space on one of the on-site educational displays set forth in Stipulation D1 for mitigating impacts to the Nelles property as a whole to the history of building, its use, and its importance as part of the rehabilitation facility.

#### C. Salvage and Reuse

1. If relocation off-site by a third party is not accomplished, project developer shall create a salvage and reuse plan identifying elements and materials that can be saved prior to any demolition work.
  - a. Salvage and reuse plan shall be included in bid documents prepared for the site.
  - b. Elements and materials that may be salvageable include:
    - i. Windows
    - ii. Doors
    - iii. Roof tiles
    - iv. Decorative elements
    - v. Framing members
    - vi. Furniture
    - vii. Lighting
    - viii. Flooring materials, such as tiles and hardwood
  - c. Shall be created by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards with demonstrated experience in creating salvage and reuse plans.
2. Project developer shall identify individuals, organizations, or businesses interested in receiving the salvaged items.
  - a. These may include:
    - i. Habitat for Humanity Restore
    - ii. Other affordable housing organizations
    - iii. Salvage yards



- b. Shall be completed by the project developer in consultation with the City.
  - c. Shall be accomplished by contacting potentially interested parties directly first.
  - d. Shall be advertised in the following locations for a period of 60 days if none of the contacted parties are able to receive the items.
    - i. Los Angeles Times
    - ii. Whittier Daily News
3. Project developer shall remove salvageable items in the gentlest, least destructive manner possible.
- a. Store salvaged items in indoor, climate- and weather-controlled conditions until recipients can retrieve them.
  - b. Shall be performed by a licensed contractor with demonstrated experience with implementing salvage and reuse plans.

#### Mitigation Measures For Impacts To Contributors To The CHL Only

Mitigation for impacts to all historical resources which contribute to the CHL only shall include the following stipulations, in addition to those stipulated above for the Nelles Facility as a whole. Historical Resources which contribute to the CHL only include: the Assistant Superintendent's Residence, Athletic Track and Field, and the Maintenance Garage. The Assistant Superintendent's Residence shall still be recorded as described below, even if it is relocated onsite and rehabilitated according to the Standards, so there will be record of it in its original location and setting. None of these mitigation measures, either alone or in combination, will mitigate impacts to the historical resource to a level of less than significant.

#### A. Recordation

1. Project developer shall create HABS-like Level II documentation prepared according to the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation.
  - a. Photographs: photographs with large-format (4x5 or larger), black and white negatives of the building; photocopies with large format negatives of select existing drawings or historic views where available.
    - i. Minimum of 8 views showing context, cardinal directions, and details.
  - b. Written data: written historical descriptive data, index to photographs, and photo key plan.
  - c. Shall be created by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards with demonstrated experience in creating HABS Level II documentation.



- d. Shall be created prior to any demolition or relocation work.
  - e. Shall be distributed to the following repositories for use by future researchers and educators. Before submitting any documents, each repository must be contacted to ensure that they are willing and able to accept the items:
    - i. Whittier Public Library
    - ii. Whittier Historical Society and Museum
    - iii. Los Angeles Public Library
    - iv. California State Library, Sacramento
    - v. South Central Coastal Information Center at CSU Fullerton
    - vi. State Office of Historic Preservation
  - f. Shall be made available on the interactive website described below under Stipulation D3.
2. Project developer shall archive artifacts found on-site prior to demolition or relocation per the requirements set forth in Stipulation C2 for mitigating impacts to the Nelles property as a whole.

#### Special Mitigation Measures For Impacts To The Maintenance Garage

The Maintenance Garage has special potential for salvage and reuse based on its brick walls. As such, the following additional mitigation for impacts to this historical resource shall include the following stipulations, in addition to those stipulated above for the Nelles Facility as a whole and for historical resources which contribute to the CHL only.

##### A. Salvage and Reuse

1. If relocation off-site by a third party is not accomplished, project developer shall create a salvage and reuse plan identifying elements and materials that can be saved prior to any demolition work.
  - a. Salvage and reuse plan shall be included in bid documents prepared for the site.
  - b. Shall be created by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards with demonstrated experience in creating salvage and reuse plans.
2. Project developer shall identify reuse opportunities within the project site.
  - a. Elements and materials that shall be reused include:
    - i. Bricks – example reuse opportunities include as paving material for walkways in parks and/or on the bike/pedestrian trail and to construct new park or neighborhood features, such as fountains, planters, recreation equipment, etc.
  - b. Shall be completed by the project developer in consultation with the City.



3. Project developer shall remove salvageable bricks in the gentlest, least destructive manner possible.
  - a. Store salvaged items in indoor, climate- and weather-controlled conditions until reinstalled as part of the project plans.
  - b. Shall be performed by a licensed contractor with demonstrated experience with implementing salvage and reuse plans.

**Level of Significance:** Significant and Unavoidable Impacts to the Fred C. Nelles Youth Correctional Facility, the Auditorium, the Assistant Superintendent's Residence, the Old Infirmary, the Athletic Track and Field, the Maintenance Garage, and the Gymnasium. Less Than Significant Impacts to the Superintendent's Residence, the Administration Building, and the Chapels Building.

## 5.4.5 CUMULATIVE IMPACTS

- **THE PROPOSED PROJECT, IN COMBINATION WITH RELATED CUMULATIVE DEVELOPMENT, WOULD RESULT IN SIGNIFICANT CUMULATIVE IMPACTS TO CULTURAL RESOURCES.**

**Impact Analysis:** Table 4-1, *Cumulative Projects List*, identifies the related projects and other possible development in the area determined as having the potential to interact with the proposed project to the extent that a significant cumulative effect may occur. The following discussions are included per topic area to determine whether a significant cumulative effect would occur.

### Cumulative Archaeological Resources Impacts

Impacts related to archaeological resources are generally considered site-specific and are assessed on a case-by-case basis. As with the Project, potential impacts to archaeological resources due to cumulative development within the Project area would be analyzed and mitigated on a site-specific, individual basis. Incremental development within the Project area would be required to comply with all applicable City, State, and Federal regulations concerning preservation, salvage, or handling of archaeological resources.

As discussed above, impacts to archaeological resources due to implementation of the Project would be less than significant with incorporation of Mitigation Measure CUL-1. In addition, given the site-specific nature of archaeological resources and existing regulations applicable to cumulative development in the Project area, cumulative impacts related to these resources would not be considerable. As such, cumulative impacts in this regard would be less than significant.

**Mitigation Measures:** Refer to Mitigation Measure CUL-1.

**Level of Significance:** Less Than Significant Impact With Mitigation Incorporated.



## Cumulative Paleontological Resources Impacts

As with archaeological resources, impacts related to paleontological resources are generally considered site-specific and are assessed on a case-by-case basis. As with the Project, potential impacts to paleontological resources due to cumulative development within the Project area would be analyzed and mitigated on a site-specific, individual basis. Incremental development within the Project area would be required to comply with all applicable City, State, and Federal regulations concerning preservation, salvage, or handling of paleontological resources.

As discussed above, impacts to paleontological resources due to implementation of the Project would be less than significant with incorporation of Mitigation Measure CUL-2. In addition, given the site-specific nature of paleontological resources and existing regulations applicable to cumulative development in the Project area, cumulative impacts related to these resources would not be considerable. As such, cumulative impacts in this regard would be less than significant.

**Mitigation Measures:** Refer to Mitigation Measure CUL-2.

**Level of Significance:** Less Than Significant Impact With Mitigation Incorporated.

## Cumulative Historical Resources Impacts

The proposed Project would result in a significant and unavoidable impact related to the loss of historic resources existing on the site, despite implementation of Mitigation Measure CUL-3. Although none of the cumulative development projects listed in [Table 4-1](#) are known to feature unique or significant historic buildings or features, additional analysis through the CEQA process on a case-by-case basis would be required to make such a determination. However, the City of Whittier, having been incorporated in 1898, has a rich and diverse history with an extensive range of historic-era resources situated throughout the City. Surrounding cities and communities (i.e., Santa Fe Springs, Pico Rivera, County of Los Angeles) feature a similarly extensive history tied to 19<sup>th</sup>- and 20<sup>th</sup>- century development in the Los Angeles area.

The demolition of the seven historical resources associated with the former Nelles facility would contribute to a cumulative loss of historic resources in the Project area when past, current, and probable future projects are considered. The Nelles facility represents a unique historic resource in Whittier, and is a prominent feature that has been associated with the local community since the late 1800s. Although Mitigation Measure CUL-3 would reduce the impacts to these resources, Project impacts would remain significant and unavoidable. Therefore, the proposed Project's cumulative contribution to the loss of historic resources is considered significant and unavoidable.

**Mitigation Measures:** Refer to Mitigation Measure CUL-3.

**Level of Significance:** Significant Unavoidable Impact.



## 5.4.6 SIGNIFICANT UNAVOIDABLE IMPACTS

Project implementation would result in a significant and unavoidable impact for the following area:

- Historical Resources. Compliance with the General Plan and WMC policies and implementation of Mitigation Measure CUL-3 would mitigate historical resources impacts to the Superintendent's Residence, the Administration Building, and the Chapels Building to less than significant levels. However, impacts to the Fred C. Nelles Youth Correctional Facility, the Auditorium, the Assistant Superintendent's Residence, the Old Infirmary, the Athletic Track and Field, the Maintenance Garage, and the Gymnasium would be significant and unavoidable on a Project-level and cumulative basis.

If the City of Whittier approves the Project, the City would be required to adopt findings of fact in accordance with CEQA Guidelines Section 15091, as well as adopt a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093.

## 5.4.7 SOURCES CITED

City of Whittier, *City of Whittier General Plan*, Comprehensively Adopted 1993.

City of Whittier, *City of Whittier Municipal Code*, Passed July 8, 2014, Codified through Ordinance No. 3023.

Duke Cultural Resources Management, LLC, *Lincoln Specific Plan Archaeological and Paleontological Assessment Report*, June 17, 2014.

GPA Consulting, *Lincoln Specific Plan Historical Resource Report*, October 2014.

Hodel, Donald R., *Exceptional Trees of Los Angeles*, 1988.

Public Resource Code Section 5020.1(q).

Public Resources Code Section 5031(a).



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