

5. Environmental Analysis

5.2 CULTURAL AND PALEONTOLOGICAL RESOURCES

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for implementation of the Eastside Elementary School Project (proposed project) to impact cultural and paleontological resources in the City of Riverside. With the update of the California Environmental Quality Act (CEQA) Guidelines approved in December 2018, impacts to paleontological resources moved to the Geology and Soils section of the Appendix G checklist. However, geology and soils questions have been determined to have less-than-significant impacts, and this Draft EIR analyzes paleontological resources as part of this section. See Chapter 8, *Impacts Found Not to Be Significant*, for an analysis of the project impacts to geology and soils.

Cultural resources comprise archaeological and historical resources. Archaeology studies human artifacts such as places, objects, and settlements that reflect group or individual religious, cultural, or everyday activities. Historical resources include sites, structures, objects, or places that are at least 50 years old and are significant due to their engineering, architecture, cultural use, association, etc. In California, historic resources cover human activities over the past 12,000 years. Cultural resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. Paleontological resources are the fossilized remains of plants and animals. This section of the Draft EIR evaluates the potential for implementation of the proposed project to impact cultural resources in the City of Riverside. The analysis in this section is based in part on the following information:

- *Phase I Archaeological and Historic Resources Assessment Riverside Unified School District: Eastside School Project City of Riverside, Riverside County, California*, FirstCarbon Solutions, November 24, 2021.
- *Paleontological resources for the Eastside Neighborhood School Project*, Natural History Museum of Los Angeles County, July 8, 2021.

Complete copies of these studies are in Appendix D and Appendix E of this Draft EIR.

5.2.1 Environmental Setting

5.2.1.1 REGULATORY BACKGROUND

Federal and State Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The NHPA authorized the National Register of Historic Places (NRHP), which lists districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review ensures that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic

5. Environmental Analysis

CULTURAL RESOURCES

Preservation, an independent federal agency, administers the review process with assistance from state historic preservation offices.

National Register of Historic Places

First authorized by the Historic Sites Act of 1935, the National Register was established by the NHPA as “an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment” (Code of Federal Regulations, 36 Section 60.2). The National Register recognizes properties that are significant at the national, state, and local levels.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 regulates the protection of archaeological resources and sites on federal and Indian lands.

Native American Graves Protection and Repatriation Act

Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants or culturally affiliated Indian tribes.

California Public Resources Code

Archaeological, paleontological, and historical sites are protected under a wide variety of state policies and regulations in the California Public Resources Code (PRC). In addition, cultural and paleontological resources are recognized as nonrenewable resources and receive protection under the PRC and CEQA.

PRC Sections 5020 to 5029.5 continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the California Register of Historical Resources (CRHR) and is responsible for designating State Historical Landmarks and Historical Points of Interest.

PRC Sections 5079 to 5079.65 define the functions and duties of the Office of Historic Preservation (OHP), which administers federal- and state-mandated historic preservation programs in California as well as the California Heritage Fund.

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites; identify the powers and duties of the Native American Heritage Commission (NAHC); require that descendants be notified when Native American human remains are discovered; and provide for treatment and disposition of human remains and associated grave goods.

5. Environmental Analysis CULTURAL RESOURCES

Paleontological Resources Preservation Act

The Paleontological Resources Preservation Act was enacted as Public Law 111-11, Title VI Subtitle D of the Omnibus Public Land Management Act of 2009 (16 US Code Sections 470aaa–470aaa-11) and directs the Department of Agriculture (United States [US Forest Service] and the Department of the Interior (National Park Service, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service) to implement comprehensive paleontological resource management programs. The US Forest Service published the Department of Agriculture version of the Preservation Act regulations in the Federal Register in April 2015.

Local Regulations

Title 20 of the Municipal Code

Title 20 establishes the authority for the preservation, composition, and administrative requirements of the Cultural Heritage Board; criteria for evaluating projects affecting cultural resources; and procedures for protecting and designating cultural resources.

Title 20 requires a Certificate of Appropriateness to alter, demolish or relocate properties that are designated or determined eligible for designation as a city cultural resource. A Certificate of Appropriateness is also required for new construction within historic districts and neighborhood conservation areas.

Design Guidelines

Design guidelines are locally developed criteria, which assist property owners, developers, architects, and others in making decisions about the appropriate treatment of historic resources for repair, rehabilitation, restoration, landscape, or new construction projects. City staff and the Cultural Heritage Board use design guidelines when evaluating the potential effects of projects on historic resources.

The city's Historic Design Guidelines incorporate the principles set forth in the Secretary of the Interior's Standards for the Treatment of Historic Properties. Prepared by the National Park Service, these standards were developed to assist the long-term preservation of historic properties through the preservation of historic materials and features. Many state and local municipalities use the Secretary of the Interior standards for reviewing preservation projects. In Riverside, they also serve as the basis for the "Principles and Standards of Site Development and Design Review" as outlined in Title 20.

5.2.1.2 EXISTING CONDITIONS

Cultural Resources

A Phase I Archaeological and Historic Resources Assessment (Phase I Assessment) was prepared by FirstCarbon Solutions (FCS) for the proposed project and is included as Appendix D to this Draft EIR. As part of the Phase I Assessment, a records search for the project site and a 0.5-mile radius beyond the project boundaries was conducted at the Eastern Information Center located at the University of California, Riverside, on February 9, 2021. To identify additional historic properties or resources, the current inventories of the

5. Environmental Analysis

CULTURAL RESOURCES

NRHP, the CRHR, the California Historical Landmarks list, the California Points of Historical Interest list, and the California Built Environment Resource Directory for Riverside County were reviewed to determine the existence of previously documented local historical resources.

The results of the records search indicate that 758 historic cultural resources have been recorded within the 0.5-mile search radius, six of which are located within the project area. Table 5.2-1, *Cultural Resources at the Project Site*, lists these six cultural resources within the project site. However, as noted, none of the listed resources appeared eligible for listing in the NRHP or the CRHR individually or as a contributor to a potential historic district. Three properties, 4307 Park Avenue, 4343 Park Avenue, and 2944 13th Street were noted as appearing eligible for special consideration in the local planning process. These properties were surveyed and reviewed as part of the Phase I Assessment as described in below subheading “Architectural and Historic Resources Assessment.”

Table 5.2-1 Cultural Resources at the Project Site

Resource No.	Resource Location (District Lot Number)	Date Recorded	Notes
P-33-027312	4307 Park Avenue (C1) ¹	2001	This property appears ineligible for the NRHP, the CRHR, and for local designation. It does, however, appear eligible for special consideration in the local planning process. The property lacks sufficient architectural character or styling. In addition, it is not associated with any known significant events or persons important to the Eastside community or the City of Riverside. This structure was demolished in 2010.
P-33-027313	4322 Park Avenue (B3)	2001	This property does not appear to qualify for listing in the NRHP individually or as a contributor to a potential historic district. The property has no known important historical associations or architectural significance and does not appear eligible for the CRHP or for local designation as a landmark or structure of merit.
P-33-027314	4342 Park Avenue (B4)	2001	This property does not appear to qualify for listing in the NRHP individually or as a contributor to a potential historic district. The property has no known important historical associations or architectural significance and does not appear eligible for the CRHP or for local designation as a landmark or structure of merit.
P-33-027315	4343 Park Avenue (C13)	2001	This property was initially noted as ineligible for the NRHP, the CRHP, and for local designation when initially evaluated in 2001. However, the property was evaluated again in 2021 as part of the proposed project. This property has been directly associated with the social and economic history of the City of Riverside as required for being considered eligible for listing in the NRHP and/or the CRHR under A/1. This property is an exceptional and rare example of a single-family dwelling that was specifically designed to allow for the front area of the building to be used for a home-based barbershop. The building has retained its original character-defining features and all of its aspects of integrity. The building stands out in its neighborhood for being in excellent condition, and appears eligible for listing in the NRHP and/or the CRHR s under Criterion C/3. This property has retained all aspects of integrity, which include design, materials, workmanship, setting, feeling, association, and location.
P-33-027316	4376 Park Avenue (B5)	2001	This property does not appear to qualify for listing in the NRHP individually or as a contributor to a potential historic district. The property has no known important historical associations or architectural significance and does not appear eligible for the CRHP or for local designation as a landmark or structure of merit.

5. Environmental Analysis CULTURAL RESOURCES

Table 5.2-1 Cultural Resources at the Project Site

Resource No.	Resource Location (District Lot Number)	Date Recorded	Notes
P-33-027663	2944 13th Street (C4)	2001	This property appears ineligible for the NRHP, the CRHP, and for local designation. It does, however, appear eligible for special consideration in the local planning process. The property lacks sufficient architectural character or styling. In addition, it is not associated with any known significant events or persons important to the Eastside community or the City of Riverside.

Source: FCS 2021.

Notes: RUSD = Riverside Unified School District; NRHP = National Register of Historic Places; CRHR = California Register of Historical Resources.

Historical Aerials

A review of 15 historical aerial photographs depicting the project site from 1948 to 2016 indicated that from the earliest aerial in 1948, the project site is situated in an urban setting, with buildings on site and in the surrounding neighborhoods in continuous development. The 1948 aerial depicted the Food Machinery Corporation to the west, which produced the Landing Vehicle Tracked (LVT 4), the amphibious landing vehicle used in WWII. The images between 1959 and 1966, indicated several structures along 14th Street were removed and remained undeveloped until sometime between 1968 and 1978 when two new structures were erected. Between 1978 and 1980, an additional structure was erected on the northwest corner of 14th Street and Park Avenue. The project area remained consistent with little to no additional urban development between 1980 and 2016, and only limited changes to infrastructure have been made leading to the present day (FCS 2021).

Pedestrian Survey

On March 3, 2021, and March 15, 2021, FCS conducted a pedestrian survey documenting the properties within the project site. The survey began on 13th Street and headed northwest toward Howard Avenue. Once heading toward Park Avenue and headed northeast. A total of 25 properties were documented, including the residential and business properties, as well as Lincoln Park and Lincoln High School.

Undeveloped parcels (Assessor's Parcel Numbers [APNs] 211-234-001; 002; 005; 009; 211-233-003; 004; 013; and 017) were surveyed for unrecorded cultural resources. Visibility of native soils was very poor due to certain parcels being overgrown with grass or hardscaped.

All areas of the exposed ground surface were examined for prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, tool-making debris, ceramics), soil discoloration or depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics). An evaluation of the residence's historic significance and eligibility for listing on the CRHR follows below.

5. Environmental Analysis

CULTURAL RESOURCES

Architectural and Historic Resources Assessment

The project site was previously evaluated in 2009 for the City of Riverside’s Modernism Context Statement and in 2011 for the Marketplace Specific Plan. Reconnaissance-level surveys and Context Statements were prepared for each study to facilitate future planning considerations.

Several of the properties in the current project area have been previously evaluated for historic significance; however, the OHP requires that properties be re-evaluated if the last evaluation/survey was performed more than 5 years ago. As such, 16 properties (20 buildings) within the project area were identified to be surveyed and evaluated or re-evaluated in accordance with OHP Guidelines for CEQA evaluations. In May, August, and November of 2021, the 16 properties (20 buildings) listed in Table 5.2-2, *Properties Surveyed for Historical Significance*, were either resurveyed or surveyed by FCS for historical significance. The resurveyed properties included cultural resources identified in Table 5.2-1. For these properties, existing Department of Parks and Recreation (DPR) recordation forms were updated, and new DPR recordation forms were created for properties that have not been previously recorded. DPR forms are included in Appendix E to the Phase I Assessment (Appendix D to the Draft EIR). The survey found a dwelling at 4343 Park Avenue (C13), and two buildings located on the campus of Abraham Lincoln High School, to be significant historical resources for the purposes of CEQA. Five of the six properties previously identified as historical resources were determined not to be of significant historical importance.

Table 5.2-2 Properties Surveyed for Historical Significance

RUSD Lot Identifier	Property Address	APN
B3	4322 Park Avenue	211-234-003
B4	4342 Park Avenue	211-234-004
B5	4376 Park Avenue	211-234-005
C7	2980 13th Street	211-233-008
C8	4342 Howard Avenue	211-233-009
C11	2993 14th Street ¹	211-233-002
C12	2945 14th Street	211-233-018
B6	4398 Park Avenue	211-234-006
C4	2944 13th Street	211-233-005
C5	2956 13th Street	211-233-006
C6	2968 13th Street	211-233-007
C13	4343 Park Avenue	211-233-002
N/A	Abraham Lincoln High School ²	211-251-001
N/A	Lincoln Park	211-231-001
N/A	2900 block of 13th Street	N/A
N/A	4300 block of Park Avenue	N/A

Notes: RUSD = Riverside Unified School District; APN = Assessor’s Parcel Number; N/A = not applicable.

¹ Two buildings are located at 2993 14th Street and the corrugated metal warehouse building was constructed in 1984 and is not old enough for historic resource consideration. Only one building was evaluated for historical significance.

² Seven buildings on the Abraham Lincoln High School property were fully surveyed and evaluated.

5. Environmental Analysis

CULTURAL RESOURCES

Archaeological Resources

Prehistoric and ethnohistoric archaeological sites likely to be found within the city include villages represented by residential bases with house features (stone and/or adobe), storage features, human burials and cremations, rock art (pictographs and/or petroglyphs); temporary encampments represented by flaked and ground stone scatters with fire hearths and possibly storage features; resource procurement and processing sites represented by bedrock milling stations, tool stone quarries, flaked and ground stone artifact scatters, and/or hunting blinds; trails demarcated by cairns and possibly rock art; isolated cultural features such as rock art, intaglios, and/or shrines; isolated flaked or ground stone artifacts; and traditional cultural landscapes/sacred places that may include important gathering or collecting places, springs, mountain tops or rock outcroppings, burial grounds, etc. (Riverside 2007). The project site is designated as unknown archaeological sensitivity by Figure 5.5-1, *Archaeological Sensitivity*, from the City's General Plan EIR. According to the Phase I Assessment, no archaeological resources were identified in the records searches or during the pedestrian survey conducted by two archaeologists from FCS on March 3 and March 15, 2021 (FCS 2021).

Paleontological Resources

A paleontological resource is a natural resource characterized as faunal or floral fossilized remains but may also include specimens of nonfossil material dating to any period preceding human occupation. It is a natural science closely associated with geology and biology. In geologically diverse California, vertebrate, invertebrate, and plant fossils are usually found in sedimentary and metasedimentary deposits.

In the early 1920s through 1950s, a number of localities have been discovered in and around the city, especially among the sands of the Santa Ana River banks. In 1923, fragments of tusk and two mammoth molars were found at a place known as "Campbell's Sand Pit," and in 1952, fragments of a mammoth jaw were discovered along the river near Grand Avenue. The original location of Campbell's Sand Pit is just east of Riverside County's Anza Narrows Regional Park. However, as of 2004, the area south of Mockingbird Canyon Reservoir is the only location considered as a place of paleontological importance in the city.

According to the Department of Conservation map of the Quaternary Surficial Geology of Southern California, the project site consists of old alluvial fan deposits (Qof) ranging in age from the late to middle Pleistocene. The Natural History Museum of Los Angeles County conducted a search of the collected records for the locality and specimen data and did not find any fossil localities that lie within the project site or the area. However, the records search indicated that fossils have been identified in the same sedimentary deposits in or near Corona, Lake Elsinore, Auld Valley, and Soboba Reservation.

5.2.2 Thresholds of Significance

CEQA Guidelines Section 15064.5 provides direction on determining significance of impacts to archaeological and historical resources. Generally, a resource shall be considered "historically significant" if it meets the criteria for listing on the CRHR, indicating it:

- is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

5. Environmental Analysis

CULTURAL RESOURCES

- is associated the with lives of persons important in our past;
- embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- has yielded, or may be likely to yield, information important in prehistory or history. (PRC Section 5024.1; 14 CCR 4852)

The fact that a resource is not listed in the CRHR, not determined to be eligible for listing, or not included in a local register of historical resources does not preclude a lead agency from determining that it may be a historical resource.

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- C-1 Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.
- C-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- C-3 Disturb any human remains, including those interred outside of dedicated cemeteries.
- C-4 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

5.2.3 Plans, Programs, and Policies

- PPP CUL-1 All construction activities will be conducted in accordance with Section 7050.5 of the California Health and Safety Code regarding the potential discovery of human remains. 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 county coroner has been contacted to determine whether the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the most likely descendant (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of the human remains with appropriate dignity, as well as any associated grave goods. The MLD shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site as provided in California Public Resources Code (PRC) Section 5097.98.

5. Environmental Analysis

CULTURAL RESOURCES

Pursuant to PRC Section 5097.98(e), whenever the NAHC is unable to identify a descendant, the descendants identified fail to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

5.2.4 Environmental Impacts

5.2.4.1 METHODOLOGY

National Register of Historic Places

To be eligible for listing in the NRHP, the quality of significance in American history, architecture, archaeology, engineering, or culture must be in a district, site, building, structure, or object that possesses integrity of location, design, setting, materials, workmanship, feeling and association, and:

- A) Is associated with events that have made a significant contribution to the broad patterns of our history; or
- B) Is associated with the lives of persons significant in our past; or
- C) Embodies the distinctive characteristics of a type, period, or method of construction or that represents 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
- D) Yields, or may be likely to yield, information important to prehistory or history.

A property eligible for listing in the NRHP must meet one or more of the four criteria (A–D) defined above and, unless the property possesses exceptional significance, must be at least 50 years old.

Integrity

In addition to meeting the criteria of significance, a property must have integrity. National Register Bulletin 15, “How to Apply the National Register Criteria for Evaluation,” establishes how to evaluate the integrity of a property. To retain historic integrity, a property must possess several, and usually most, of the following aspects of integrity:

- 1) Location is the place where the historic property was constructed or the place where the historic event occurred.
- 2) Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- 3) Setting is the physical environment of a historic property, and refers to the character of the site and the relationship to surrounding features and open space. Setting often refers to the basic physical conditions

5. Environmental Analysis

CULTURAL RESOURCES

under which a property was built and the functions it was intended to serve. These features can be either natural or manmade, including vegetation, paths, fences, and relationships between other features or open space.

- 4) Materials are the physical elements that were combined or deposited during a particular period or time, and in a particular pattern or configuration to form a historic property.
- 5) Workmanship is the physical evidence of crafts of a particular culture or people during any given period of history or prehistory, and can be applied to the property as a whole, or to individual components.
- 6) Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, when taken together, convey the property's historic character.
- 7) Association is the direct link between the important historic event or person and a historic property.

California Register of Historical Resources

CEQA Guidelines Section 15064.5 provides direction on determining significance of impacts to archaeological and historical resources. Generally, a resource shall be considered "historically significant" if the resource meets the criteria for listing on the CRHR, indicating it:

- 1) is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- 2) is associated the with lives of persons important in our past;
- 3) embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- 4) has yielded, or may be likely to yield, information important in prehistory or history. (PRC Section 5024.1; 14 CCR Section 4852)

City of Riverside: Local Eligibility

The City of Riverside, through provisions in the City of Riverside Municipal Code, has established processes to preserve its designated historic resources. The provisions of the City of Riverside Municipal Code relative to historic preservation (Title 20; Cultural Resources) present various planning tools to promote the "... public health, safety and general welfare by providing for the identification, protection, enhancement, perpetuation and use of improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets, works of art, natural features and significant permanent landscaping having special historical, archaeological, cultural, architectural, community, aesthetic or artistic value in the City."

Section 20.20.010 of the ordinance uses the following criteria to define a local landmark:

- A) It exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural or natural history, or

5. Environmental Analysis CULTURAL RESOURCES

- B) It is identified with persons or events significant in local, state or national history; or
- C) It embodies distinctive characteristics of a style, type, period or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
- D) It represents the work of a notable builder, designer or architect; or
- E) It contributes to the significance of a historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development; or
- F) It has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood community or of the City; or
- G) It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation; or
- H) It is similar to other distinctive properties, sites, areas, or objects based on a historic, cultural or architectural motif; or
- I) It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation motifs, or distinctive example of park or community planning; or
- J) It is one of the few remaining examples in the City, region, State, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.

Chapter 20.21.010 defines the criteria by which a cultural resource may be designated as a Structure of Merit in the City. They are:

- A) It represents in its location an established and familiar visual feature of the neighborhood, community or City; or
- B) It materially benefits the historic, architectural or aesthetic character of the neighborhood; or
- C) It is an example of a type of building which was once common but is now rare in its neighborhood, community or area; or
- D) It is connected with a business or use which was once common but is now rare; or
- E) It contributes to an understanding of contextual significance of a neighborhood, community or area.

The proposed project was evaluated for historical resources eligibility based on the NRHP, CRHR, and local criteria pursuant to the CEQA Guidelines Section 15064.5.

5. Environmental Analysis

CULTURAL RESOURCES

5.2.4.2 IMPACT ANALYSIS

The following impact analysis addresses the thresholds of significance; the applicable thresholds are identified in brackets after the impact statement.

Impact 5.2-1: Development of the proposed project could cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. [Threshold C-1]

As described in Section 5.2.1.2, *Existing Conditions*, “Architectural and Historic Resources,” the dwelling at 4343 Park Avenue and two buildings located on the campus of Lincoln High School have been surveyed and evaluated and were found to be significant historical resources for the purposes of CEQA (see Figure 5.2-1, *Historical Resources*). The dwelling at 4343 Park Avenue is within the boundaries of the proposed project under all options, and the two buildings in the Lincoln High School are within the boundaries of the proposed project under Options 1 and 3.

National Register of Historic Places, California Register of Historical Resources, and Local Listing Eligibility Evaluation

4343 Park Avenue (Wiley-Williams House)

The Wiley-Williams House at 4343 Park Avenue is a rare example of a building that is directly associated with the Eastside community of Riverside during the early 20th century, and it is also directly associated with an African American family that contributed to the history of Riverside. As described below, the property at 4343 Park Avenue is eligible for the NRHP and/or the CRHR under criteria A/1 (Event) and C/3 (Architecture).

NRHP and/or the CRHR under Criterion A/1: Event. The subject property is located within the Marketplace District, an area of Riverside where the owners could not take advantage of financial opportunities available to white residents of the city. In the early 1920s, when the home at 4343 Park Avenue was purchased by Lillie Wiley and Luther Williams, who were black Americans, the mayor of the city was purposely designing regulations to prevent black residents from living in “white neighborhoods.” Black Americans would be discriminated against through segregation in schools and public places, and after World War II, the home-owning and education benefits of the GI Bill were not made available to black Americans. The house at 4343 Park Avenue has direct ties to two generations of the same black American family living within a socially unequal system. Therefore, the property at 4343 Park Avenue has been directly associated with the social and economic history of the City of Riverside, as required for being considered eligible for listing in the NRHP and/or the CRHR under Criterion A/1: Event.

NRHP and/or the CRHR under Criterion B/2: Person. Although Lillie May Wiley-Williams was a direct relation of Aaron and Jeremiah Wiley, who owned and operated a grocery store on 12th Street in the early 1920s, research has not found her to have played an important role in the history of the Eastside Neighborhood, either through commercial or volunteer endeavors in the City of Riverside, and thus, the property does not meet the criteria for Criterion B/2: Person.

5. Environmental Analysis

Figure 5.2-1 - Historical Resources



--- Project Boundary

0 200
Scale (Feet)



Source: Nearmap, 2021

5. Environmental Analysis

CULTURAL RESOURCES

This page intentionally left blank.

5. Environmental Analysis CULTURAL RESOURCES

NRHP and/or the CRHR under Criterion C/3: Architecture. The property at 4343 Park Avenue is an exceptional and rare example of a single-family dwelling that was specifically designed to allow for the front area of the building to be used for a home-based barbershop. The building has retained its original character-defining features and all of its aspects of integrity. The building stands out in its neighborhood for being in excellent condition, and that rusticated concrete block and rubble-stone cast concrete block were used to create a visually interesting exterior to a small bungalow. The property appears eligible for listing in the NRHP and/or the CRHR under Criterion C/3: Architecture.

NRHP and/or the CRHR under Criterion D/4: Information Potential. The property at 4343 Park Avenue does not appear to have the capacity to yield information important to the history of Riverside, as required to be eligible for listing under Criterion D/4: Information Potential.

The property at 4343 Park Avenue has retained all aspects of integrity, which include design, materials, workmanship, setting, feeling, association, and location.

Irving Elementary School Kindergarten Building

The Irving School Kindergarten Building is an excellent example of Craftsman style designed elementary school architecture. The building has retained a high level of physical integrity and is able to convey its historic significance as an educational building constructed over 100 years ago.

The Irving School Kindergarten Building has been found eligible for listing in the NRHR under Criterion C, and the CRHR Criterion 3, for being a building that embodies the distinctive characteristics of an education building dating from the early 20th century designed in the Craftsman style of architecture.

The building has not been directly associated with significant events that have made a contribution to the broad pattern of national, state, or local history, nor has the building been found to have been directly associated with the lives of persons important to local, state, or national history.

Additionally, it does not appear that the building has the ability to yield information important to the history of the local area, California, or the nation.

The Irving School Kindergarten Building has retained the aspects of integrity, including design, workmanship, materials, location, setting, association, and feeling. The property is being assigned OHP Status Code 3S.

Irving Elementary School Assembly Building

The Irving School Assembly Building is an excellent example of an Art Moderne style influenced elementary school building. The partnership between the District and Works Progress Administration (WPA) was based upon the school district paying for all materials and choosing the architect for the project. The school district retained the services of G. Stanley Wilson, who had designed many schools in the region as part of New Deal Programs. The WPA was responsible for providing labor and construction management. Due to the massive build-up of buildings and structures at March Field and Camp Haan, it took the WPA over 18 months for the Irving Elementary School Assembly Building to be completed, as the crews had been diverted to the military

5. Environmental Analysis

CULTURAL RESOURCES

sites. Local lore of the Eastside Neighborhood tells that many of the local women helped to finish the building so that it could be open for the 1941 school year.

The Irving School Assembly Building has been found eligible for listing in the NRHR under Criterion A, and the CRHR Criterion 1, for being a building constructed by the WPA for the Irving Elementary School. The Irving School Assembly Building is a physical representation of one of Franklin D. Roosevelt's New Deal Programs that provided aid to communities large and small across the United States.

The Irving School Assembly Building has been found eligible for listing in the NRHR under Criterion C, and the CRHR Criterion 3, for being a building that embodies the distinctive characteristics of an education built under the WPA in an Art Modern style of architecture. This building is a rare example of this architectural style in the City of Riverside and is also an example of the works of G. Stanley Wilson.

The building has not been directly associated with the lives of persons important to local, state, or national history. Additionally, it does not appear that the building has the ability to yield information important to the history of the local area, California, or the nation.

The Irving School Assembly Building has retained the aspects of integrity, including design, workmanship, materials, location, setting, association, and feeling. The property is being assigned OHP Status Code 3S.

Project Impacts

Substantial adverse change means the physical demolition, destruction, relocation, or alteration of a resource, or its immediate surroundings, such that the ability of the historical resource to convey its significance would be materially impaired. The significance of a historic resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a resource that convey its historic significance and that justify its eligibility for inclusion in the NRHR, in the CRHR, and/or as a Historic Landmark in the City of Riverside.

Implementation of the proposed project under all three options would require physical demolition, destruction, or relocation of the property at 4343 Park Avenue, therefore resulting in a potentially significant impact. The proposed project would not result in physical demolition, destruction, or relocation of the Irving Elementary School Kindergarten Building and the Irving Elementary School Assembly Building under all three options. However, under Options 1 and 3, the proposed project could result in the alteration of these buildings, or their immediate surroundings.

Level of Significance Before Mitigation: Potentially significant impact.

Impact 5.5-2: Development of the project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. [Threshold C-2]

As described in Section 5.2.1.2, *Existing Conditions*, subsection *Archaeological Resources*, no evidence of archaeological materials was observed during the pedestrian survey nor during the records search. Although no evidence of archaeological resources has been identified, the project boundaries for all three options contain undeveloped parcels and many of the construction within the project site parcels were undertaken before the

5. Environmental Analysis CULTURAL RESOURCES

institution of CEQA, and the project site has never been fully assessed for the presence or absence of archaeological remains. Potentially significant cultural resources consist of, but are not limited to, stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. Therefore, there is a possibility of unanticipated and accidental archaeological discoveries during ground-disturbing project-related activities.

Level of Significance Before Mitigation: Potentially significant impact.

Impact 5.2-3: Grading activities could potentially disturb human remains. [Threshold C-3]

The proposed project, under all three options, would require demolition, ground clearing, excavation, grading, and other construction activities. California Health and Safety Code, Section 7050.5; CEQA Section 15064.5; and PRC Section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, California Health and Safety Code, Section 7050.5, requires that disturbance of the site shall halt until the county coroner has investigated the circumstances, manner, and cause of death and made the recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative, according to PRC Section 5097.98. If the coroner determines that the remains are not subject to his or her authority and has reason to believe they belong to a Native American, he or she shall contact, by telephone within 24 hours, the NAHC. In the event soil-disturbing activities associated with the proposed project would result in the discovery of human remains, compliance with existing law (see PPP CUL-1) would ensure that impacts to human remains would not be significant.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.2-4: The proposed project could directly destroy a unique paleontological resource or site or unique geologic feature. [Threshold G-1]

Fossils have been found within the city limits in the 1920s and 1950s near the embankment of Santa Ana River. However, no known paleontological resources have been recorded in the recent years within the city limits according to the Natural History Museum of Los Angeles County records search result. The closest known paleontological localities are in or near Corona, Lake Elsinore, Auld Valley, and Soboba Reservation. The city's General Plan EIR indicated that the area south of Mockingbird Canyon Reservoir is the only portion of the city other than the Santa Ana Riverbanks considered as a place of paleontological importance. Although no known localities have been found on or near the project site, fossils are known to occur in unknown geologic formation of Pleistocene age, and the surficial sediments at the project site and surrounding area are from the late to middle Pleistocene age. Therefore, ground-disturbing activities in Pleistocene age alluvial deposits may yield paleontological resources, and any substantial excavation in these geologic formations shall be monitored closely to recover any fossil remains while not impeding development. Implementation of the proposed project could result in adverse impacts to paleontological resources without mitigation.

Level of Significance Before Mitigation: Potentially significant impact.

5. Environmental Analysis

CULTURAL RESOURCES

5.2.5 Cumulative Impacts

The cumulative context associated with the proposed project is the Eastside Neighborhood, which is mostly composed of medium-density residential areas. The areas are largely built out with single-family homes representing a diverse cross section of architectural styles and sizes, with homes being built as early as the 1800s and also more recently constructed infill development. Figure 7, *Historic Districts and Neighborhood Conservation Areas*, of the Eastside Neighborhood Plan, illustrates historic districts and neighborhood conservation area within the Eastside Neighborhood, and the project site is not included in these historic districts. However, implementation of the proposed project and cumulative projects in the City of Riverside, including, but not limited to the Riverside County Transportation Commission's proposed Riverside Downtown Station Improvement Project, could result in removal of historical resources within the Eastside Neighborhood, which would result in significant and unavoidable impact even with mitigation measures. Therefore, the proposed project, in conjunction with past, present, and reasonably foreseeable actions, would result in a cumulatively significant and unavoidable impact related to historic resources.

Implementation of the proposed project and cumulative projects in the city could potentially unearth previously unidentified archaeological and paleontological resources. However, as with the proposed project, site-specific impacts would require mitigation measures to minimize impacts to a less-than-significant level. Provided that mitigation measures are provided for site-specific impacts in the city, impacts to archaeological and paleontological resources would be reduced to a less-than-significant level, and no cumulatively significant impacts would remain. No additional mitigation would be necessary.

5.2.6 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, some impacts would be less than significant: Impact 5.2-3.

Without mitigation, the following impacts would be **potentially significant**:

- **Impact 5.2-1** Implementation of the proposed project would require physical demolition, destruction, or relocation of a historical resource.
- **Impact 5.2-2** Implementation of the proposed project could result in discovery of subsurface archaeological resources.
- **Impact 5.2-4** Implementation of the proposed project could result in discovery of paleontological resources.

5. Environmental Analysis CULTURAL RESOURCES

5.2.7 Mitigation Measures

Impact 5.2-1

Historic Resources Rehabilitation

- CUL-1 To reduce historical resources impacts from rehabilitation and future use of the Irving Elementary School Kindergarten and Assembly Buildings, the Riverside Unified School District (District), as lead agency, shall appoint a District staff person to be the Project Mitigation Monitor (PMM) while the District undertakes the mitigation measures listed below. The PMM shall notify the President of the Old Riverside Foundation (ORF) and the President of the Riverside County Historical Society (RCHS), by mail and email, of any project activities that would result in a physical change or alteration to the historic buildings at a minimum of 10 business days before such action will occur. The District shall provide ORF and RCHS sufficient information for their review of the proposed actions in adherence to the approved methods of rehabilitation.
- CUL-2 Prior to construction, the Riverside Unified School District (District) shall put in place, and maintain protective fencing around the historic buildings to be rehabilitated. The protective fencing shall remain in place at the historic buildings up to and including after the historic buildings have been rehabilitated/renovated and the project Historic Architect/Architectural Historian deems that the fencing can be removed.
- CUL-3 Prior to rehabilitation, the Riverside Unified School District shall retain the services of a Historic Architect and/or Architectural Historian who meets the Secretary of the Interior's Standards (SOIS) for Professionals, and has at least 10 years of experience with using the SOIS, to develop a plan for the rehabilitation and/or compatible adaptive reuse of the historic buildings (Irving Elementary School Kindergarten and Assembly Buildings on Lincoln High School). This shall require the use of a historic architect or architectural historian who has experience working with the SOIS to ensure that rehabilitation plans meet the requirements of California Environmental Quality Act.
- CUL-4 Prior to undertaking a project to rehabilitate the historic buildings, a Historic Structures Report (HSR) shall be prepared by the project's historic architects or architectural historians to document current conditions of the building (as per National Park Service, Preservation Brief No. 43). An HSR serves to be a working guide for the project holder and rehabilitation team. The HSR can provide a range of rehabilitation concepts (and their costs) that meets Secretary of the Interior's Standards, Historic Building Code, and other life and safety issues based on the building's current conditions.
- CUL-5 Prior to undertaking a project to rehabilitate the historic buildings, the Riverside Unified School District shall retain the services of a professional photographer, or qualified architectural historian (with experience in documenting historic buildings per National Park Service standards), to create a record of the resource(s) as listed below. Photographs shall be

5. Environmental Analysis

CULTURAL RESOURCES

taken to capture a minimum of eight interior and six exterior photographs of each historic resource, and its character-defining features, so that the photographs can be used to document the building(s) in its current condition. The photographic records must be donated to the repositories prior to the alteration, move, or demolition of a historic building.

- Three sets of digital color photographs printed on 5-inch by 7-inch archivally-stable paper. A shot-sheet of the location of where the individual photographs were captured.
- An archivally-stable compact disc (CD) of all digital photographs.
- The photographs shall be labeled in accordance with instructions used for submissions to the Historic American Building Survey program; placed in archivally-stable sleeves; and placed in a binder along with a CD of the digital photographs and shot sheet.
- A history, and physical description of the buildings architecture, shall accompany the photographs in their individual binders.
- Three copies of the photographic record shall be created, with one copy contributed to the Special Collection of UC Riverside Rivera Library, one to the Local History Room at the Main Branch of the City of Riverside Library, and one to the Riverside Metropolitan Museum.

CUL-6 Digital copies of the Historic Structure Report, and all working drawings and plans shall be recorded on CDs, and contributed to the archival repositories named above in Mitigation Measure CUL-5. The digital building records shall be donated to the archival repositories prior to the alteration, move, or demolition of a historic building.

CUL-7 A commemorative brass or aluminum plaque, suitable for noting a building that is eligible for listing in the National Register, shall be set in concrete and embedded in the sidewalk or lawn of the front yard of the building, visible to the public. (Suitable plaques are available from Franklin Bronze Plaques or United State Bronze Plaques.)

Historic Resources Demolition

CUL-8 To reduce historical resources impacts from demolition of the 4343 Park Avenue property, the Riverside Unified School District (District) shall appoint a District staff person to be the Project Mitigation Monitor (PMM) while RUSD undertakes the mitigation measures listed below. The PMM shall notify the President of the Old Riverside Foundation (ORF) and the President of the Riverside County Historical Society (RCHS), by mail and email, of any project activities that would result in a physical change or alteration to the historic buildings at a minimum of 10 business days before such action will occur. RUSD shall provide ORF and RCHS sufficient information for their review of the proposed actions in adherence to the approved methods of rehabilitation.

CUL-9 Prior to undertaking a project to demolish the historic building, the project proponents shall retain the services of a professional photographer, or qualified architectural historian (with

5. Environmental Analysis CULTURAL RESOURCES

experience in documenting historic buildings per National Park Service standards), to create a record of the resources. Photographs will be taken to capture a minimum of eight interior and six exterior photographs of each historic resource, and its character-defining features, so that the photographs can be used to document the building(s) in its current condition. Aerial photographs will be captured by drone photography, or from commercially available aerial photography sources, of the historic building within its neighborhood. (Commercially available aerial photographs must have captured the building and its neighborhood within one year of project implementation.) The photographic records shall be donated to the repositories prior to the issuance of any permit for the alteration, move, or demolition of a historic building.

- Three sets of digital color photographs should be printed on 5-inch by 7-inch archivally-stable paper. A shot-sheet of the location of where the individual photographs were captured shall be prepared.
- An archivally-stable compact disc (CD) of all digital photographs shall be created.
- The photographs shall be labeled in accordance with instructions used for submissions to the Historic American Building Survey program; placed in archivally-stable sleeves; and placed in a binder along with a cd of the digital photographs and shot sheet.
- A history and physical description of the building's architecture shall accompany the photographs in their individual binders.
- Three copies of the photographic record shall be created, with one copy contributed to the Special Collection of UC Riverside Rivera Library, one to the Local History Room at the Main Branch of the City of Riverside Library, and one to the Riverside Metropolitan Museum.

CUL-10 Digital copies of the Historic Structure Report, and all working drawings and plans shall be recorded on CDS, and contributed to the archival repositories named above in Mitigation Measure CUL-9. The digital records must be donated to the repositories prior to the issuance of any permit for the alteration, move, or demolition of a historic building.

CUL-11 Prior to historic resources building demolition, interpretive signage or a website shall be created to commemorate the history of the historic resource within its historic context (i.e., history of Wiley-Williams family, history of WPA projects, works of G. Stanley Wilson, Art Moderne architecture, history of Irving School, history of schools in the City of Riverside, and the history of the Eastside Neighborhood). The text and graphic design of the interpretive sign(s) shall be held by a 24-inch by 36-inch National Park Service quality outdoor, interpretive sign and frame, with text and photographs created by an Architectural Historian. The large sign will be placed in a location where it can be viewed by the general public, possibly along Park Avenue within the boundary of Lincoln Park.

5. Environmental Analysis

CULTURAL RESOURCES

If a website is created it shall be hosted by the Riverside Unified School District for a period no less than 5 years, with search parameters allowing for the public to have access to the information in a simple browser search for history relating to the topics above.

CUL-12 Prior to historic resources building demolition, Old Riverside Foundation (ORF) shall be provided the opportunity to harvest any and all historic material they desire from the building.

Impact 5.2-2

CUL-13 During grading and site excavation activities, the construction contractor retained by the Riverside Unified School District (District) shall monitor all construction activities. During earth-disturbing activities, if buried cultural resources are discovered, operations shall stop in the immediate vicinity of the find, and a qualified archaeologist that meets the Secretary of the Interior's Standards and Guidelines for Professional Qualifications in Archaeology shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the District on the measures that shall be implemented to protect the discovered resources, including, but not limited to, the excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the California Environmental Quality Act (CEQA) Guidelines.

Any previously undiscovered resources found during construction within the project area shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria.

If the resources are determined to be unique historic resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the archaeological monitor and recommended to the District. Appropriate mitigation measures for significant resources could include avoidance or capping; incorporation of the site in green space, parks, or open space; or data recovery excavations of the finds.

No further grading shall occur in the area of the discovery until the District approves the measures to protect these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by District where they would be afforded long-term preservation to allow future scientific study.

Impact 5.2-4

CUL-14 During grading and site excavation activities, the construction contractor retained by the Riverside Unified School District (District) shall monitor all construction activities. In the event that cultural, tribal cultural, and/or paleontological resources are discovered, work shall be halted within 50 feet of the discovery, and the construction contractor shall inform the project manager of District, and District shall retain a qualified paleontologist. The qualified paleontologist shall have the ability to redirect construction activities to ensure avoidance of adverse impacts to paleontological resources.

5. Environmental Analysis CULTURAL RESOURCES

California Public Resources Code Section 5097.5 prohibits unauthorized removal of paleontological remains, and California Penal Code Section 622.5 sets the penalties for damage or removal of paleontological resources. If the qualified paleontologist determines that a resource constitutes a paleontological resource, the qualified paleontologist shall develop a paleontological monitoring and treatment plan and monitor the remainder of the project site. The plan should serve to reduce impacts to the resources and allow construction to proceed.

Any potentially significant fossils observed shall be collected and recorded in conjunction with best management practices and Society of Vertebrate Paleontology professional standards. Any fossils recovered during mitigation shall be offered to an accredited and permanent scientific institution or other educational institutions for the benefit of current and future generations.

5.2.8 Level of Significance After Mitigation

Impact 5.2-1

Under Options 1 and 3, the proposed project would protect the Irving Elementary School Kindergarten and Assembly Buildings on Lincoln High School in place and rehabilitate them as required by Mitigation Measures CUL-1 through CUL-7, therefore, impacts would be less than significant. Under Option 2, the Irving Elementary School Kindergarten and Assembly Buildings would not be impacted. Implementation of the proposed project under all three options would require physical demolition and destruction of the property at 4343 Park Avenue (Wiley-Williams House), therefore resulting in a potentially significant impact. With implementation of Mitigation Measures CUL-8 through CUL-12, potentially significant impacts to 4343 Park Avenue (Wiley-Williams House) would be reduced. However, even with the implementation of mitigation measures, which requires documentation and recordation of the Wiley-Williams House through the preparation of a historic resources report and photographs, and opportunities to harvest any and all historic materials, the building would be demolished, and impact to 4343 Park Avenue, a historic resource, would remain significant and unavoidable.

Impact 5.2-2

Implementation of Mitigation Measure CUL-13 would reduce potential impacts to archaeological resources to a level that is less than significant. Therefore, no significant, unavoidable, adverse impacts to archaeological resources have been identified.

Impact 5.2-4

Implementation of Mitigation Measure CUL-14 would reduce potential impacts to paleontological resources to a level that is less than significant. Therefore, no significant, unavoidable, adverse impacts to paleontological resources have been identified.

5. Environmental Analysis

CULTURAL RESOURCES

5.2.9 References

FCS (FirstCarbon Solutions). 2021. Phase I Archaeological and Historic Resources Assessment.

Riverside, City of. 2007, July. Recirculated Draft Program Environmental Impact Report, City of Riverside General Plan 2025 Program (State Clearinghouse Number 2004021108).
<https://riversideca.gov/cedd/planning/city-plans/general-plan-0>