

# Draft Environmental Impact Report

State Clearinghouse No. 2018041074



## OLD SCHOOLHOUSE REMOVAL

Azusa Unified School District

June 2019



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Azusa Unified School District

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## Abbreviations and Acronyms

### **ABBREVIATIONS AND ACRONYMS**

|            |   |
|------------|---|
| AB         | Assembly Bill   |
| ACM        | asbestos-containing materials                               |
| amsl       | above mean sea level  |
| bgs        | below ground surface  |
| BMP        | best management practices                                   |
| CALGreen   | California Green Building Standards Code                    |
| CalRecycle | California Department of Resources, Recycling, and Recovery |
| CBC        | California Building Code                                    |
| CCR        | California Code of Regulations                              |
| CDE        | California Department of Education                          |
| CEQA       | California Environmental Quality Act                        |
| CGS        | California Geologic Survey                                  |
| DTSC       | Department of Toxic Substances Control                      |
| EIR        | environmental impact report                                 |
| LBP        | lead-based paint  |
| NAHC       | Native American Heritage Commission                         |
| NPDES      | National Pollution Discharge Elimination System             |
| RWQCB      | Regional Water Quality Control Board                        |
| SB         | Senate Bill   |
| SQMP       | stormwater quality management plan                          |
| SWPPP      | Storm Water Pollution Prevention Plan                       |
| SWRCB      | State Water Resources Control Board                         |
| WQMP       | water quality management plan                               |

# 1. Executive Summary

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This Draft Environmental Impact Report (DEIR) addresses the environmental effects associated with the implementation of the proposed Old Schoolhouse Removal project. The California Environmental Quality Act (CEQA) requires that local government agencies consider the environmental consequences before taking action on projects over which they have discretionary approval authority. An environmental impact report (EIR) analyzes potential environmental consequences in order to inform the public and support informed decisions by local and state governmental agency decision makers. This document focuses on impacts determined to be potentially significant in the Initial Study completed for this project (see Appendix A).

This DEIR has been prepared pursuant to the requirements of CEQA and the Azusa Unified School District's (AUSD or District) CEQA procedures. AUSD, as the lead agency, has reviewed and revised all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment.

Data for this DEIR is derived from onsite field observations; discussions with affected agencies; analysis of adopted plans and policies; review of available studies, reports, data and similar literature; and specialized environmental assessments (cultural and historic resources)

## 1.1 ENVIRONMENTAL PROCEDURES

This DEIR has been prepared in accordance with CEQA Guidelines Section 15084 to assess the environmental effects associated with implementation of the proposed project as well as anticipated future discretionary actions and approvals. CEQA established six main objectives for an EIR:

1. Disclose to decision makers and the public the significant environmental effects of proposed activities.
2. Identify ways to avoid or reduce environmental damage.
3. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
4. Disclose to the public reasons for agency approval of projects with significant environmental effects.
5. Foster interagency coordination in the review of projects.
6. Enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation in CEQA and the CEQA Guidelines; it is intended to provide an objective, factually supported analysis and full disclosure of the environmental consequences of a proposed project with the potential to result in significant, adverse environmental impacts.

## 1. Executive Summary

An EIR is one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Before approving a proposed project, the lead agency must consider the information in the EIR; determine whether the EIR was prepared in accordance with CEQA and the CEQA Guidelines; determine that it reflects the independent judgment of the lead agency; adopt findings concerning the project's significant environmental impacts and alternatives; and adopt a statement of overriding considerations if significant impacts cannot be avoided.

### 1.1.1 EIR Format

**Chapter 1. Executive Summary:** Summarizes the background and description of the proposed project, the format of this EIR, project alternatives, any critical issues remaining to be resolved, and the potential environmental impacts and mitigation measures identified for the project.

**Chapter 2. Introduction:** Describes the purpose of this EIR, background on the project, the notice of preparation, the use of incorporation by reference, and Final EIR certification.

**Chapter 3. Project Description:** A detailed description of the project, including its objectives, its area and location, approvals anticipated to be required as part of the project, necessary environmental clearances, and the intended uses of this EIR.

**Chapter 4. Environmental Setting:** A description of the physical environmental conditions in the vicinity of the project as they existed at the time the notice of preparation was published, from local and regional perspectives. These provide the baseline physical conditions from which the lead agency determines the significance of the project's environmental impacts.

**Chapter 5. Environmental Analysis:** Each environmental topic is analyzed in a separate section that discusses: the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the existing environmental setting; the potential adverse and beneficial effects of the project; the level of impact significance before mitigation; the mitigation measures for the proposed project; the level of significance after mitigation is incorporated; and the potential cumulative impacts of the proposed project and other existing, approved, and proposed development in the area.

**Chapter 6. Significant Unavoidable Adverse Impacts:** Describes the significant unavoidable adverse impacts of the proposed project.

**Chapter 7. Alternatives to the Proposed Project:** Describes the alternatives and compares their impacts to the impacts of the proposed project. Alternatives include the No Project Alternative and a Reduced Intensity Alternative.

**Chapter 8. Impacts Found Not to Be Significant:** Briefly describes the potential impacts of the project that were determined not to be significant by the Initial Study and were therefore not discussed in detail in this EIR.

## 1. Executive Summary

**Chapter 9. Significant Irreversible Changes Due to the Proposed Project:** Describes the significant irreversible environmental changes associated with the project.

**Chapter 10. Growth-Inducing Impacts of the Project:** Describes the ways in which the proposed project would cause increases in employment or population that could result in new physical or environmental impacts.

**Chapter 11. Organizations and Persons Consulted:** Lists the people and organizations that were contacted during the preparation of this EIR.

**Chapter 12. Qualifications of Persons Preparing EIR:** Lists the people who prepared this EIR for the proposed project.

**Chapter 13. Bibliography:** The technical reports and other sources used to prepare this EIR.

**Appendices:** The appendices for this document (in PDF format on a CD attached to the front cover) comprise these supporting documents:

- Appendix A: Notice of Preparation and Initial Study
- Appendix B: Responses to Notice of Preparation
- Appendix C: Lead-Based Paint Inspection Report
- Appendix D: Board and City Council Reports
- Appendix E: Nuisance Letter
- Appendix F: Historical Resources Assessment Report
- Appendix G: Tribal Coordination
- Appendix H: Cost Estimate
- Appendix I: National Parks Service Mothball Report
- Appendix J: Preliminary Report of Current Conditions

### 1.1.2 Type and Purpose of This DEIR

This DEIR has been prepared as a “Project EIR,” defined by Section 15161 of the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3). This type of EIR examines the environmental impacts of a specific development project and should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.

## 1.2 PROJECT LOCATION

The project site is located on the southeast corner of the Slauson Middle School campus at 340 West 5th Street in the City of Azusa, Los Angeles County; the project site has its own address at 403 North Angeleno Avenue, Azusa, at the northwest corner of the intersection of West 4th Street and North Angeleno Avenue. The project site is about 0.5-mile northeast of Interstate 210 (I-210).

## 1. Executive Summary

### 1.3 PROJECT SUMMARY

The proposed project involves removing the Old Schoolhouse structure, removing chain-link fencing around the structure, capping utility systems connected to the structure, and improving the footprint of the Old Schoolhouse and surrounding area with either landscape or parking. If the project were approved, demolition of the Old Schoolhouse structure could occur between the District's 2019 winter break and 2020 spring break. The District is considering two options to remove the Old Schoolhouse:

- **Sell the Old Schoolhouse.** The District would offer to sell the Old Schoolhouse in its current state to a successful buyer who can preserve the structure in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.
- **Demolish the Old Schoolhouse.** If a successful buyer is not identified or if the structure is not removed from District property (i.e., project site) by the successful buyer prior a specified deadline, the District would demolish the Old Schoolhouse structure.

Once the Old Schoolhouse structure is removed from the project site and utilities connected to it are capped, the site would be improved with either landscaping or parking, as described below. The proposed improvements would be made shortly after the structure's removal.

- **Landscaping.** The approximately 3,750-square-foot area of the building would be replaced with landscaping and maintained as Slauson Middle School's lawn; or
- **Parking Lot.** Consistent with the Slauson Middle School Facilities Master Plan, the building's footprint and adjoining parking area would be improved with a 31-stall parking lot and landscaping. This option encompasses an area of approximately 14,000 square feet and includes paving over approximately 5,000 square feet of existing landscape. Access to the parking lot would be from an existing driveway on West 4th Street.

### 1.4 SUMMARY OF PROJECT ALTERNATIVES

CEQA requires that an EIR include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives" (CEQA Guidelines Section 15126.6). The following project alternatives were identified and analyzed for relative impacts to the proposed project.

- No Project
- Mothball the Old Schoolhouse In-Situ
- Rehabilitate for Adaptive Reuse of the Old Schoolhouse In-Situ
- Relocate to Another District Property and Rehabilitate for Reuse

The following presents a summary of the alternatives analyzed in the EIR. These alternatives were developed to avoid or substantially lessen the significant impact the project could have on historical resources. Please

## 1. Executive Summary

refer to Chapter 7 of this DEIR for a complete discussion of each of the alternatives and their associated impacts.

### **1.4.1 No Project Alternative**

Under this alternative, no changes to the project site would occur. The Old Schoolhouse would maintain its current condition with limited public access and would remain in its current site. The District would continue to conduct minimal maintenance and upkeep of the Old Schoolhouse.

### **1.4.2 Mothball the Old Schoolhouse In-Situ Alternative**

Under this alternative, the Old Schoolhouse building would remain in its current location, but would be “mothballed” in accordance with the National Park Service’s Technical Preservation Brief #31, “Mothballing Historic Buildings.” Mothballing the Old Schoolhouse building would prevent it from further deterioration until additional funding became available for an alternate feasible alternative, such as the “rehabilitate and reuse” alternative, below. This mothballing alternative would close the Old Schoolhouse building temporarily to protect it from weather and secure it from vandalism. Mothballing would ensure that the roofs are watertight, that the drainage of the building would not result in damage, that pests and nests have been removed from the building, that the electrical wiring of the building is safe, that the building is secure, and that the building is well ventilated. Prior to securing the building, physical repairs would be conducted and a condition assessment would be prepared, which would include full detail of all interior and exterior architectural features of the building.

### **1.4.3 Rehabilitate for Adaptive Reuse of the Old Schoolhouse In-Situ Alternative**

Under this rehabilitation alternative, the Old Schoolhouse structure would not be demolished, and the footprint of the structure would not be improved with landscaping for extension of the Slauson Middle School lawn or with a new parking lot. The Old Schoolhouse would be stabilized in its current location for low-impact reuse, including but not limited to office space, part-time museum, and/or educational facility for Slauson Middle School. This alternative would be implemented in accordance with Secretary Standards for the treatment of historic properties, as well as applicable California Historical Building Code requirements, and Division of the State Architect requirements for structural safety and Field Act compliance. Under this alternative, the existing fencing surrounding the building would be removed, and students and staff of District would be able to occupy the Old Schoolhouse building.

### **1.4.4 Relocate to Another District Property and Rehabilitate for Reuse**

Under this alternative, the Old Schoolhouse structure would be relocated from Slauson Middle School to the northeastern corner of Center Middle School, approximately 1.2 miles southeast of the project site. The relocation and the proposed alterations to the Old Schoolhouse would be consistent with the Secretary’s Standards for Treatment of Historic Properties for adaptive reuse.

## 1. Executive Summary

### 1.5 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the proposed project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this DEIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance.
3. Whether the proposed land use changes are compatible with the character of the existing area.
4. Whether the identified goals, policies, or mitigation measures should be adopted or modified.
5. Whether there are other mitigation measures that should be applied to the project besides the mitigation measures identified in the DEIR.
6. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic project objectives.

### 1.6 AREAS OF CONTROVERSY

Areas of controversy include the following:

1. Potential loss of a historic building. Comments regarding the historic building and the proposed project have been received by the District in response to the Notice of Preparation released by the District on the proposed project.
2. Although the project's preservation consultant believes it is technically feasible to relocate the Old Schoolhouse, there is risk of damage to the structure and its historical character.
3. Due to the economic conditions of the state and District, the District is not able to fund preservation of the structure.

### 1.7 SUMMARY OF ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Table 1-1 summarizes the conclusions of the environmental analysis contained in this EIR. Impacts are identified as significant or less than significant, and mitigation measures are identified for all significant impacts. The level of significance after imposition of the mitigation measures is also presented.



# 1. Executive Summary

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation**

| Environmental Impact   | Level of Significance Before Mitigation | Mitigation Measures   | Level of Significance After Mitigation   |
|--|---|---|--|
| <b>5.1 HISTORICAL RESOURCES</b>  |   |   |  |
| 5.1-1 Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5? | Potentially Significant                 | <p>CUL-1 Prior to the removal of the Old Schoolhouse building—via relocation and rehabilitation in conformance with the Secretary’s Standards or demolition—the District shall retain qualified individuals to document the facility using the Historic American Building Survey (HABS) Level III standards as a guideline for recording the building through a compilation of photographs, drawings, and written description to record the historic resource:</p> <ul style="list-style-type: none"> <li>• Written Data: The history of the property and description of the historic resource shall be prepared. The Historic Resource Assessment Report of The Old Schoolhouse (DEIR Appendix F) may be used.</li> <li>• Drawings: A sketch plan of the interior floorplan of the building shall be prepared.</li> <li>• Photographs: Large-format photographs and negatives shall be produced to capture interior and exterior views of the Old Schoolhouse structure. At least two large format pictures shall be taken to show the building’s setting in context, and in relationship to its location. The photographs and negatives must be created using archival stable paper and processing procedures.</li> <li>• Document: The HABS Level III document must be produced on archival-quality paper, and all large format photographs and negatives labeled to HABS standards. A digital version of the HABS document shall be prepared with the hard copy. The final HABS Level III document shall be donated to the Azusa Historical Society and/or other responsible repository within the San Gabriel Valley.</li> </ul> | <p>Sale of the Old Schoolhouse would result in a Less Than Significant Impact.</p> <p>Demolition would result in a Significant and Unavoidable Impact.</p> |

# 1. Executive Summary

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation**

| Environmental Impact   | Level of Significance Before Mitigation | Mitigation Measures  | Level of Significance After Mitigation |
|--|---|--|--|
| <b>5.2 TRIBAL CULTURAL RESOURCES</b>   |   |  |  |
| 5.2-1 The proposed removal of the Old Schoolhouse would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, pursuant to criteria in Public Resources Code section 5024.1(c), or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). | Less Than Significant                   | No mitigation required.  | Less Than Significant                  |
| 5.2-2 Soil-disturbing activities for the proposed project may encounter undiscovered tribal cultural resources.  | Potentially Significant                 | TCR-1 In the event of an accidental discovery of subsurface items during soil disturbance construction activities, the District shall immediately retain a qualified registered professional archaeologist (RPA) to evaluate the potential resource and make a finding of significance under Section 15064.5 of the California Environmental Quality Act Guidelines. If the RPA determines that the potential resource is of tribal cultural significance, the RPA shall contact liaisons for local Native American tribes, including but not limited to the Gabrieleño Band of Mission Indians, Kizh Nation, and their Native Monitor. The RPA and Native Monitor shall assess the find and as appropriate develop a plan for recovery, analysis, report, and/or curation of the item to the appropriate entity or Native American tribe. The find shall be reported to an accredited and permanent scientific institution, such as the South Central Coastal Information Center. | Less Than Significant                  |

## 2. Introduction

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### 2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This draft environmental impact report (DEIR) has been prepared to satisfy CEQA and the CEQA Guidelines. The environmental impact report (EIR) is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage and to identify alternatives to the project. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

The lead agency means “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment” (Guidelines § 21067). The Azusa Unified School District has the principal responsibility for approval of the Old Schoolhouse Removal project. For this reason, the Azusa Unified School District is the CEQA lead agency for this project.

The intent of the DEIR is to provide sufficient information on the potential environmental impacts of the proposed Old Schoolhouse Removal to allow the Azusa Unified School District to make an informed decision regarding approval of the project.

This DEIR has been prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code, §§ 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations, §§ 15000 et seq.)

The overall purpose of this DEIR is to inform the lead agency, responsible agencies, decision makers, and the general public about the environmental effects of the development and operation of the proposed Old Schoolhouse Removal project. This DEIR addresses effects that may be significant and adverse; evaluates alternatives to the project; and identifies mitigation measures to reduce or avoid adverse effects.

## 2. Introduction

### 2.2 NOTICE OF PREPARATION AND INITIAL STUDY

The District determined that an EIR would be required for the proposed project and issued a Notice of Preparation (NOP) and Initial Study on April 30, 2018 (see Appendix A). Comments received during the NOP and Initial Study's public review period, from April 30, 2018, to May 29, 2018, are in Appendix B.

The NOP process helps determine the scope of the environmental issues to be addressed in the DEIR. Public outreach for the NOP and Initial Study included distribution using the following methods:

- NOP published on April 30, 2018, in *The San Gabriel Valley Tribune* newspaper.
- NOP posted at the office of the Los Angeles County Registrar-Recorder/County Clerk.
- NOP and Initial Study distributed to 15 state agencies through the Governor's Office of Planning and Research, State Clearinghouse.
- NOP distributed to agencies with potential interest in project (list of agencies included in Appendix B).
- The NOP and Initial Study were available on the District's website: <http://ausd-ca.schoolloop.com/business>.
- The NOP and Initial Study were available to the public for review at:
  - Azusa Unified School District, 546 South Citrus Avenue, Azusa, CA 91702
  - Slauson Middle School, Administrative Office, 340 West Fifth Street, Azusa, CA 91702

Three agencies and one resident submitted comments during the NOP/Initial Study review period. Table 2-1, *NOP Response Letters*, summarizes their comments and references the EIR sections where they are addressed.

## 2. Introduction

**Table 2-1 NOP Response Letters**

| Commenting Agency                   | Comment Summary  | Issue Addressed In:  |
|-------------------------------------|--|--|
| Azusa Historical Society            | <ul style="list-style-type: none"> <li>Provides historical context of the Old Schoolhouse</li> <li>Recommends joint opportunity for the District and Azusa Historical Society to preserve Old Schoolhouse</li> <li>Old Schoolhouse was used for polling location, other than City Hall</li> <li>State they believe it meets historical criteria for State designation</li> <li>Requests preservation and restoration of the structure</li> </ul>   | 5.1 Historical Resources   |
| City of Azusa                       | <ul style="list-style-type: none"> <li>Identifies Old Schoolhouse as potential historic landmark</li> <li>Requests project objectives</li> <li>Requests further discussion of Municipal Code compliance with Chapter 55, Historic Preservation</li> <li>Requests City be identified as responsible agency</li> <li>States that the Initial Study / Notice of Preparation do not identify light and glare impacts, compliance with City Stormwater Ordinance (Municipal Code Chapter 60), identification of infiltration design features</li> </ul> | 3. Project Description<br>4. Environmental Setting<br>5.1 Historical Resources<br>Appendix A – NOP / Initial Study |
| Gabrieleño Band of Mission Indians  | <ul style="list-style-type: none"> <li>Requests Native American monitor during all ground disturbances</li> </ul>  | 5.2 Tribal Cultural Resources  |
| Native American Heritage Commission | <ul style="list-style-type: none"> <li>Project may require compliance with AB 52 and SB 18, and tribal consultation may be required.</li> <li>Recommendations for cultural resource assessments were provided.</li> <li>Examples of mitigation measures were provided.</li> </ul>  | 5.2 Tribal Cultural Resources  |
| Resident – Art Morales              | <ul style="list-style-type: none"> <li>Cites government, nation, community, and education issues</li> <li>Community connection</li> </ul>  | 5.1 Historical Resources   |

### 2.3 SCOPE OF THIS DEIR

The scope of the DEIR was determined based on District consultation with the City and comments received in response to the NOP. Pursuant to Sections 15126.2 and 15126.4 of the CEQA Guidelines, the DEIR should identify any potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance.

The information in Chapter 3, *Project Description*, establishes the basis for analyzing future, project-related environmental impacts. However, further environmental review by the City may be required as more detailed information and plans are submitted on a project-by-project basis.

#### 2.3.1 Impacts Considered Less Than Significant

During preparation of the Initial Study, Azusa Unified School District determined that 16 environmental impact categories were not significantly affected by or did not affect the proposed Old Schoolhouse Removal project. These categories are not discussed in this DEIR.

## 2. Introduction

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Geology and Soils
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

### 2.3.2 Potentially Significant Adverse Impacts

The District determined that two environmental factors have potentially significant impacts if the proposed project is implemented.

- Historical Resources
- Tribal Cultural Resources

### 2.3.3 Unavoidable Significant Adverse Impacts

This DEIR identifies one significant and unavoidable adverse impact, as defined by CEQA, which would result from implementation of the proposed option that would result in the demolition of the Old Schoolhouse. Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. The District must prepare a “statement of overriding considerations” before it can approve the project, attesting that the decision-making body has balanced the benefits of the proposed project against its unavoidable significant environmental effects and has determined that the benefits outweigh the adverse effects, and therefore the adverse effects are considered acceptable. The impact that was found in the DEIR to be significant and unavoidable is Impact 5.1-1 in Historical Resources, Chapter 5.1 of the DEIR.

## 2.4 FINAL EIR CERTIFICATION

This DEIR is being circulated for public review for 45 days. Interested agencies and members of the public are invited to provide written comments on the DEIR to the District address shown on the title page of this document. Upon completion of the 45-day review period, the District will review all written comments

## 2. Introduction

received and prepare written responses for each. A Final EIR (FEIR) will incorporate the received comments, responses to the comments, and any changes to the DEIR that result from comments. The FEIR will be presented to the District Board of Education for certification as the environmental document for the project. All persons who comment on the DEIR will be notified of the availability of the FEIR and the date of the public hearing before the District.

The DEIR is available to the general public for review at various locations:

- Azusa Unified School District  
546 South Citrus Avenue  
Azusa, CA 91702
- Slauson Middle School  
340 West 5th Street  
Azusa, CA 91702
- Azusa Unified School District website  
<https://ausd-ca.schoolloop.com/>

### 2.5 MITIGATION MONITORING

Public Resources Code, Section 21081.6, requires that agencies adopt a monitoring or reporting program for any project for which it has made findings pursuant to Public Resources Code 21081 or adopted a Negative Declaration pursuant to 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR or Negative Declaration.

The Mitigation Monitoring Program for the Old Schoolhouse Removal project will be completed as part of the Final EIR, prior to consideration of the project by the District Board of Education.

## 2. Introduction

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## 3. Project Description

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### 3.1 PROJECT LOCATION

The project site is on the southeast corner of the Slauson Middle School campus at 403 North Angeleno Avenue, northwest of the intersection of West 4th Street and North Angeleno Avenue in the City of Azusa, Los Angeles County, California.

### 3.2 STATEMENT OF OBJECTIVES

The following project objectives were developed for the proposed Old Schoolhouse Removal project to aid decision makers in their review of the need for the project and evaluation its environmental impacts:

1. Ensure public welfare and safety of Slauson Middle School occupants and surrounding community.
2. Reduce District liability associated with the Old Schoolhouse, a non-Field Act compliant structure.
3. Reduce District exposure by eliminating safety hazards and hazardous materials.
4. Ensure wise and efficient use of public resources.
5. Improve aesthetics of Slauson Middle School and surrounding community.
6. Ensure prudent and responsible spending of limited District funds.
7. Minimize or eliminate, if possible, costs associated with the Old Schoolhouse.
8. Maximize useable space at Slauson Middle School.
9. Consider the feasibility for preservation or adaptive reuse of the Old Schoolhouse.
10. Develop mitigation to reduce or eliminate, if possible, significant effects, if preservation and/or adaptive reuse is determined infeasible.

### 3.3 PROJECT CHARACTERISTICS

“Project,” as defined by the CEQA Guidelines, means:

the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1) An activity directly undertaken by any public agency including but not limited to

### 3. Project Description

public works construction and related activities clearing or grading of land, improvements to existing public structures.... (14 Cal. Code of Reg. 15378[a])

#### 3.3.1 Project Description

The proposed project involves removing the Old Schoolhouse structure, removing chain-link fencing around the structure, capping utility systems connected to the structure, and improving the footprint of the Old Schoolhouse and surrounding area with either landscape or parking.

The District is considering two options to remove the Old Schoolhouse:

- **Sell the Old Schoolhouse.** The District would offer to sell the Old Schoolhouse in its current state to a successful buyer who can preserve the structure in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties.
- **Demolish the Old Schoolhouse.** If a successful buyer is not identified or if the structure is not removed from District property (i.e., project site) by the successful buyer prior a specified deadline, the District would demolish the Old Schoolhouse structure.

If the proposed project were approved, the District would first advertise the sale of the building on its website and request a posting of the advertisement on the City of Azusa’s website. A listing for a structure-sale-only would be purchased in the “classifieds” section of a regional or local newspaper of general circulation. An ad would also be purchased in publications that specialize in the advertisement and sale of historic properties. The bidding period would remain open for 30 days after the date of advertisement to allow adequate response from interested persons. The qualified bidder (i.e., individuals, groups of individuals, or public agencies) would be required to meet minimum qualifications in order to be considered by the District:

- 1) Have adequate financial resources for the relocation and rehabilitation of the Old Schoolhouse. The bidder must demonstrate the financial wherewithal to relocate, restore, and maintain the structure (using Secretary of Interior Guidelines) through the identification of cash reserves, specific grants, or other funding sources.
- 2) Have an available relocation site for the Old Schoolhouse. The bidder will be required to describe its size, zoning, physical characteristics and general appropriateness to accommodate the structure. The bidder shall explain its current ownership or lease of the property or ability to acquire the site.
- 3) Be able to relocate the Old Schoolhouse structure prior to a specified deadline.
- 4) Agree to release the District from financial responsibility and liability from hazards associated with the buildings in perpetuity.

Figure 3-1, *Sample Notice to Sell Ad*, presents a sample advertisement to sell the Old Schoolhouse structure.

### 3. Project Description

If a successful buyer is not identified or if the Old Schoolhouse structure is not removed by the buyer before the deadline, the District would demolish the Old Schoolhouse structure within 30 days after the close of the bidding period or after the deadline to remove the building from District property. The District anticipates consideration of the proposed project by its Board of Education at a school board meeting in September 2019 or soon thereafter. If the project were approved, demolition of the Old Schoolhouse structure could occur between the District's 2019 winter break and 2020 spring break.

Once the Old Schoolhouse structure is removed from the project site and utilities connected to it are capped, the site would be improved with either landscaping or parking, as described below. The proposed improvements would be made shortly after the structure's removal.

- **Landscaping.** Under the landscaping option, the approximately 3,750-square-foot area of the building would be replaced with landscaping and maintained as Slauson Middle School's lawn. The new lawn area would be combined with the existing lawn space north of the project site and would provide new space for students to congregate. This option would expand useable open space area on the campus.
- **Parking Lot.** Under the parking lot option, consistent with the Slauson Middle School Facilities Master Plan, the building's footprint and adjoining parking area west of the Old Schoolhouse would be improved with a 31-stall parking lot and landscaping; no exterior security lighting would be installed. This option encompasses an area of approximately 14,000 square feet and entails paving over approximately 5,000 square feet of existing landscape. Landscaping would be installed at the southeast corner of the project site and would filter stormwater runoff. Access to the parking lot would be from an existing driveway on West 4th Street. Figure 3-2, *Proposed Parking Lot*, shows the proposed layout.

The site is relatively small, and construction of either option would not be substantial. The District and its contractors would maintain best management practices, including erosion control to prevent debris and sediment flow onto the public right-of-way and nearby drainage inlet and tracking control at the driveway on 4th Street. The project would comply with all applicable regulations concerning stormwater runoff and fugitive dust. The area would either be paved or be planted with landscape to prevent erosion and impacts to water quality.

## 3.4 PROJECT APPROVAL

It is the intent of this DEIR to evaluate the environmental impacts of the proposed project, thereby enabling AUSD, responsible government agencies, and interested parties to make informed decisions with respect to the required actions.

### 3.4.1 Lead Agency

AUSD is the lead agency under CEQA and has the final approval authority over the proposed project. At the completion of the FEIR, the AUSD Board of Education will consider certification of the FEIR and approval of the proposed project.

### 3. Project Description

#### 3.4.2 Responsible Agencies

A public agency other than the lead agency that has discretionary approval power over a project is known as a “responsible agency,” as defined by CEQA Guidelines Section 15381. Removal of the Old Schoolhouse will not require approval (e.g., permits, financing approval, or participation agreement) from other public agencies. Therefore, there are no responsible agencies for the proposed project, and no other government agency will be required to use the EIR.

#### 3.4.3 Reviewing Agencies

Reviewing agencies include agencies that do not have discretionary powers to approve or deny the proposed project or actions needed to implement it, but may review the initial study and EIR for adequacy and accuracy. Reviewing agencies for the proposed project may include but are not limited to:

- California Office of Historic Preservation (OHP)
- City of Azusa

Figure 3-1 - Sample Notice to Sell Ad  
3. Project Description

**PUBLIC NOTICE**  
Proposal to Sell  
Old Schoolhouse

Azusa Unified School District (District) proposes to sell for not less than \$1 the "Old Schoolhouse" at 403 North Angeleno Avenue in Azusa, Los Angeles County, California. The Old Schoolhouse is eligible for listing in the California Register. It appears to be the oldest and last remaining, one-room schoolhouse in Azusa and the San Gabriel Valley.

The District is accepting proposals from potential buyers, including qualified individuals, groups of individuals, private organizations, or public agencies capable of relocating the structure to an appropriate site and rehabilitating it such that its historical significance is maintained. In addition to specifying the proposed purchase price, the District is requesting that interested purchasers submit a plan identifying:

- (1) *The availability of an appropriate site.* Please identify the location of the proposed receiving site and describe its size, zoning, physical characteristics and general appropriateness to accommodate the Old Schoolhouse. Please explain the existing and anticipated ownership or leasehold interest in the property.
- (2) *The individual's/organization's financial capability.* The individual/organization must describe the financial resources it has available to relocate, restore/rehabilitate, and maintain the building in accordance with the *Secretary of the Interior's Guidelines for the Treatment of Historic Properties, Standards for the Rehabilitation*. This can be accomplished through the identification of cash reserves, specific grants, or other funding sources. Should the District elect to move forward with the proposed sale, the District will require the successful bidder to post a bond or other negotiable security in the amount of \_\_\_\_\_ that will be forfeited to the District in the event that the building is not removed from the site within a previously determined timeline.
- (3) *The timeline by which the relocation will be accomplished.* It is critical that the structure be moved from the current site by \_\_\_\_\_.

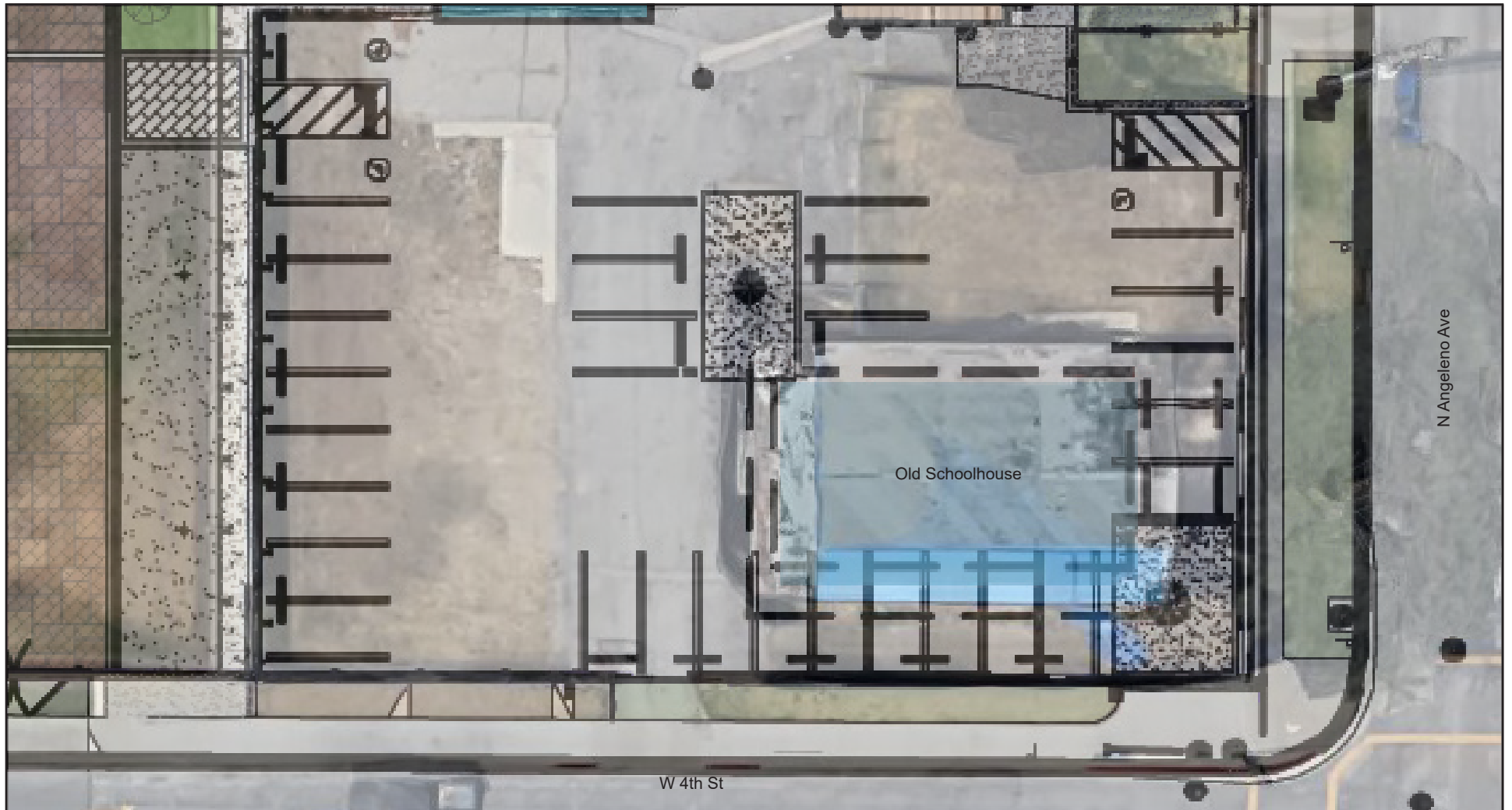
Sale of the Old Schoolhouse will be accompanied by an agreement under which the buyer shall indemnify and defend the District from losses suffered in association with the sale and relocation of the structure. The District reserves the right to request additional information and/or meet with potential bidders to clarify and differentiate proposals. The deadline for an entity's declaration of interest in the Old Schoolhouse is \_\_\_\_\_.

Marc Bommarito  
Assistant Superintendent, Business Services  
Azusa Unified School District  
546 South Citrus Avenue  
Azusa, CA 91702  
mbommarito@azusa.org

### 3. Project Description

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Figure 3-2 - Proposed Parking Lot  
3. Project Description



 Old Schoolhouse for Removal

0  25  
Scale (Feet)



### 3. Project Description

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## 4. Environmental Setting

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This section provides a “description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, ... from both a local and a regional perspective” (Guidelines § 15125[a]), pursuant to provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The environmental setting provides the baseline physical conditions from which the lead agency will determine the significance of environmental impacts resulting from the proposed project.

### 4.1 REGIONAL ENVIRONMENTAL SETTING

The project site is in the City of Azusa (City) in southeast Los Angeles County and is surrounded by the cities of Duarte, Irwindale, and Bradbury to the west; Glendora to the east; Irwindale and Covina to the south; and the San Gabriel Canyon and San Gabriel Mountains to the north. The City covers approximately 9.7 square miles and includes another 1,368 acres within its sphere of influence, for a total of 11.8 square miles. The topography of the City varies; elevations range from about 2,080 feet at the north edge of the City to about 475 feet at Arrow Highway and Vincent Avenue in the southwest. The San Gabriel Mountains are approximately 2.5 miles to the north.

### 4.2 LOCAL ENVIRONMENTAL SETTING

#### 4.2.1 Project Site

The subject facility and the project site are properties of the Azusa Unified School District (AUSD or District), which is a public-school district. The District operates 11 elementary schools, a K-8 school, 3 middle schools (including Slauson Middle School), 3 high schools, and an alternative education center. AUSD serves students in the City and portions of neighboring cities of Covina and Glendora that are within the District’s boundary.

The project site is in the southeast corner of the Slauson Middle School campus (340 West 5th Street, Azusa). North Angeleno Avenue, West 5th Street, North Orange Avenue, and West 4th Street surround the campus to the east, north, west, and south. Residential uses surround Slauson Middle School to the east, north, and west; Memorial Park Recreation Center is to the south. Slauson Middle School is about 0.35 mile northeast of Interstate 210.

The project site is northwest of the intersection of North Angeleno Avenue and West 4th Street and has a physical address of 403 North Angeleno Avenue. The site contains a former schoolhouse structure (i.e., Old Schoolhouse) that is surrounded by a screen fence, grass, and an asphalt driveway used for parking. A grass field is west of the project site, and north of the site are the school’s studio arts classroom (northwest) and a

## 4. Environmental Setting

District kitchen (northeast). Residential uses are to the east, and Memorial Park to the south. An aerial image of the Old Schoolhouse and its proximity to the surrounding uses is provided in Figure 4-1, *Aerial Photograph*.

### 4.2.2 Old Schoolhouse

The Old Schoolhouse is vacant and was previously used by Slauson Middle School and the District as storage. Prior to its relocation to the project site in 1946, the structure was the first kindergarten facility at the former Riley School on 4th Street, between Soldano Avenue and Pasadena Avenue; the building has been identified as school housing for Mexican and Latino children before the District was required by federal law to integrate their schools in 1946. The Old Schoolhouse is associated with the history of education in the City of Azusa and appears to be the oldest and last remaining one-room schoolhouse in Azusa and the San Gabriel Valley. The structure is eligible for inclusion in the California Register; see Section 5.1 for analysis.

#### 4.2.2.1 INTERIOR

The building interior includes the following spaces (generally from west to east): a bathroom, laundry room, kitchenette, storage room, smaller classroom area, and the main classroom. The floorplan of the building layout is provided in Figure 4-2, *Old Schoolhouse Floor Plan*. The interior spaces were modified from their original condition with false walls, but the main classroom would have extended the width of the building in its original condition.

#### 4.2.2.2 EXTERIOR

The building is supported by wood posts attached to plywood boards that enclose a crawlspace between the ground and bottom of the building. The original exterior of the building was remodeled in 1929 and altered with room additions to the north and south elevations, which were later removed. The main entrance into the building is on the eastern façade under an awning supported by round metal posts. Concrete steps lead to the front door, and red brick planters are on each side of the steps. The awning support posts are set in the red brick planters. A large window opening to the north of the front door is covered over with plywood; remaining windows include three sets of jointed bi-fold casement windows on the north and south sides of the building (see Figure 4-3, *Photos of the Old Schoolhouse*).

#### 4.2.2.3 HAZARDS AND SAFETY CONDITION

The Old Schoolhouse is in poor condition. The building was previously occupied by a caretaker and then used for storage. It has been minimally maintained and is now in disrepair. Although boarded up, the structure still attracts rats and racoons and poses public safety concerns. Additionally, the stability of the structure is compromised. The Old Schoolhouse is not Field Act<sup>1</sup> compliant and contains lead-based paint (see Appendix C, *Lead-Based Paint Inspection Report*). It presents hazards for school occupants—students and staff—as well as passersby on adjacent North Angelino Avenue and West 4th Street and is a liability to the District.

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<sup>1</sup> The Field Act is a state-mandated law that mandates earthquake resistant construction of buildings. The act also established the Division of the State Architect, which developed design standards, quality control procedures, and required that schools be designed by registered architects and engineers.

## 4. Environmental Setting

### 4.2.2.4 CHRONOLOGY OF DISTRICT AND CITY EFFORTS ON THE OLD SCHOOLHOUSE

A chronology of the efforts made by the District and City to sell the Old Schoolhouse and designate it as a historic landmark is below. District Board of Education and City Council documents to support the following chronology are included as Appendix D to this document:

- The 1983-2004 City General Plan Historic Preservation Element included a survey list of historic properties and buildings recommended for preservation. Included on the list were the Old Schoolhouse structure and the Old Schoolhouse's original site on 4th Street, between Soldano Avenue and Pasadena Avenue.
- On February 20, 2001, the City Council approved a list of 58 properties in the City as Potential Historic Landmarks. The Old Schoolhouse structure and its original site were omitted from this list.
- On March 5, 2001, the City Council approved the survey list of 96 properties in the City from which the Potential Historic Landmarks list was derived. The Old Schoolhouse and its original site were not on the list.
- The Amended 2004 Azusa General Plan, which is the effective general plan, does not list the Old Schoolhouse or its original site as a Potential Historical Landmark or within a Potential Historic District.
- On October 4, 2005, the District Board of Education approved Resolution #05-06:30, which established a process for removal of the Old Schoolhouse via relocation by a non-District entity or demolition of the Old Schoolhouse by the District. The Resolution states the deadline to declare interest in the building was March 31, 2006, and the deadline to remove the building from District property was December 31, 2006.
- On January 17, 2006, the City Council considered the feasibility of relocating the Old Schoolhouse to City property. The council moved to further discuss the issue at the January 30, 2006, joint meeting with the District Board of Education.
- On January 30, 2006, the City and District held a joint meeting to discuss the disposition of the Old Schoolhouse. The staff report states the cost to remove the building ranged between \$12,000 and \$15,000 and refurbishment would cost \$85,000 (or up to \$100,000). The cost to demolish the building, foundation, and sewer line would be \$7,200; the cost to demolish only the foundation and sewer line would be \$2,500. The City Council questioned the District's ability to preserve the Old Schoolhouse in place or otherwise. The District stated it was not in a position to spend educational funds to refurbish an unsafe building.
- On April 11, 2006, the District extended the deadline of March 31, 2006, to declare interest in the Old Schoolhouse by 30 days at the request of Mercy Storehouse, a nonprofit entity who expressed interest in relocating and reusing the Old Schoolhouse. The relocation was unsuccessful.
- On December 19, 2006, the Commission recommended to the City Council to add the Old Schoolhouse to the City's Survey List of 1456 Historic Properties and List of Potential Historic Landmarks.

## 4. Environmental Setting

- On February 20, 2007, the City Council approved placement of the Old Schoolhouse on the City’s Survey List of Historic Properties only. The Old Schoolhouse structure is not on the City’s Historic Landmarks list.
- On October 23, 2013, the City notified the District of a complaint concerning the dilapidated condition of the Old Schoolhouse, that repairs to the Old Schoolhouse shall be made accordingly, and to remove the mesh fabric attached to the chain link fence that surrounds the Old Schoolhouse; Appendix E includes the letter from the City).

### 4.3 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS

Cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (14 California Code of Regulations § Section 15130[b]). Cumulative impacts are the change caused by the incremental impact of the project evaluated in the EIR together with the incremental impacts from closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects.

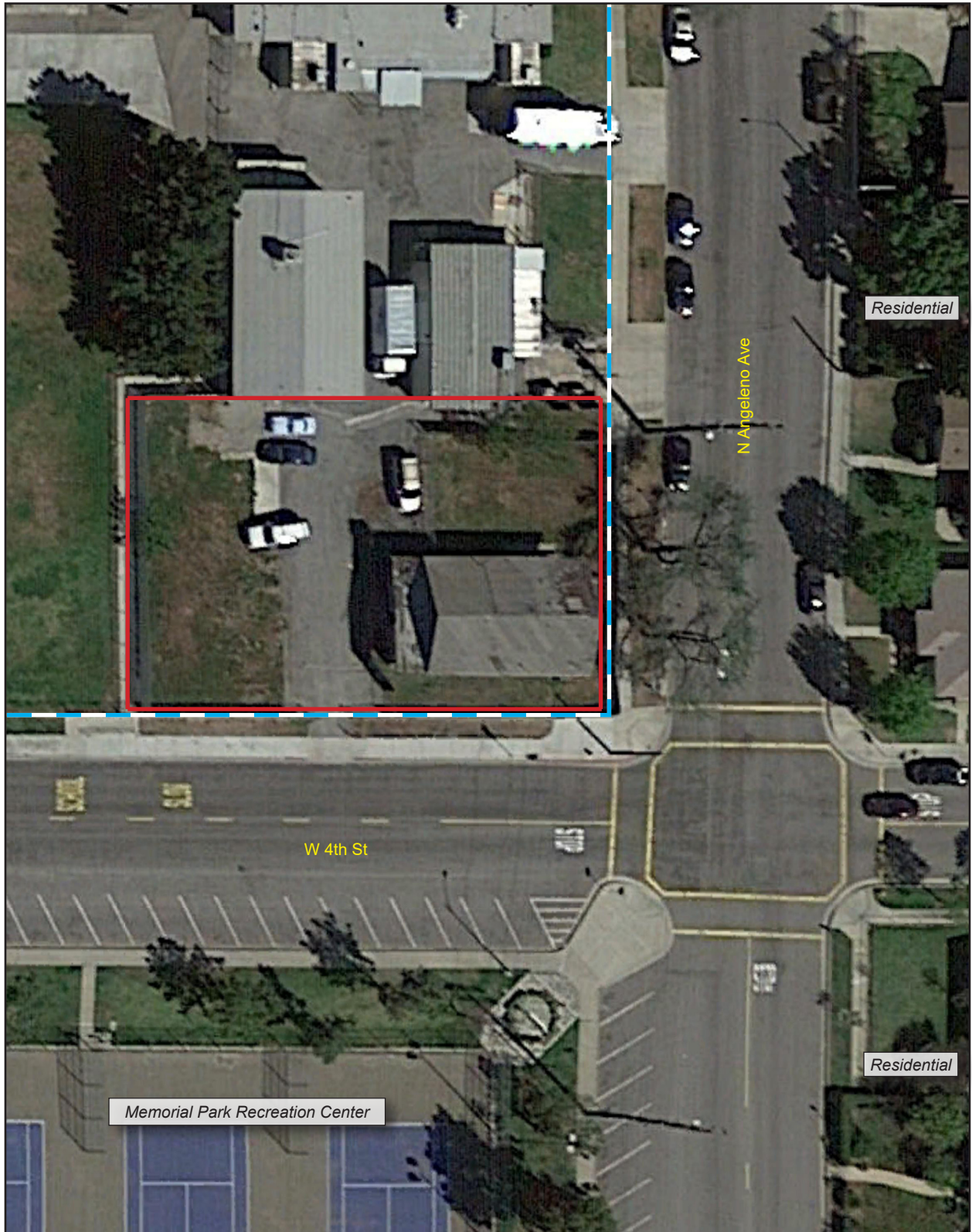
Section 15130 of the CEQA Guidelines states that cumulative impacts shall be discussed when the project’s incremental effect is cumulatively considerable. It further states that this discussion shall reflect the level and severity of the impact and likelihood of occurrence, but not in as much detail as the project.

The information used in an analysis of cumulative impacts comes from one of two sources:

- A. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, projects outside of the control of the agency.
- B. A summary of projections in an adopted general plan or related planning document, or in a prior environmental document that has been adopted or certified, that described or evaluated regional or area-wide conditions contributing to the cumulative impact.

The cumulative impact analyses in this EIR uses a combination of sources A and B. The City of Azusa has not provided a list of cumulatively related projects. Nevertheless, it is not expected that any potentially related project—when combined with the proposed project—would have a cumulatively considerable effect on historic resources. This issue is further discussed in Section 5.1.3.

Figure 4-1 - Aerial Photograph  
4. Environmental Setting



— School Boundary

— Project Boundary

0 45  
Scale (Feet)

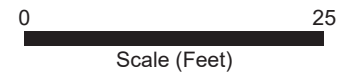
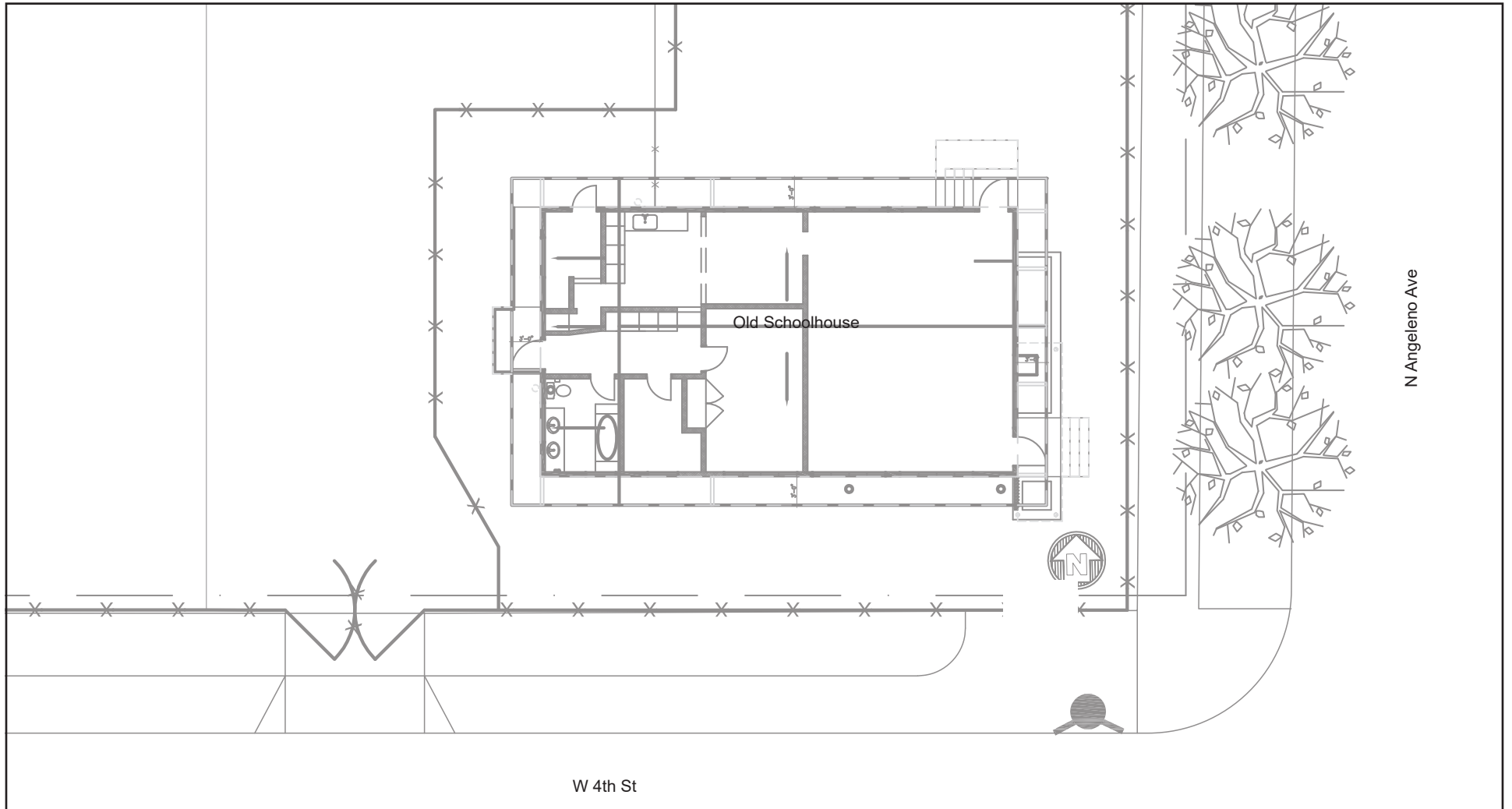


Source: Google Earth, 2015

## 4. Environmental Setting

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Figure 4-2 - Old Schoolhouse Floor Plan  
4. Environmental Setting



## 4. Environmental Setting

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Figure 4-3 - Photos of the Old Schoolhouse  
4. Environmental Setting



View of the Old Schoolhouse looking southwest. The entrance to the building is on the left (eastern side of the building). Note the physical condition of the building.



View looking northwest of the Old Schoolhouse. Note that the fence in the foreground would be removed as part of the project.

## 4. Environmental Setting

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## 5. Environmental Analysis

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Chapter 5 examines the environmental setting of the proposed project with respect to the environmental resource, analyzes the significance of the project's effects on the resource, and recommends mitigation measures to reduce or avoid impacts. Chapter 5 has a separate section for each environmental issue area that was determined to need further study by the initial study and notice of preparation (NOP), which were published April 2018 (see Appendix A), as well as through public and agency comments received during the NOP comment period from April 30, 2018, to May 29, 2018 (see Appendix B).

The environmental issues analyzed in the DEIR are:

- 5.1 Historic Resources
- 5.2 Tribal Cultural Resources

Each section provides discussion of applicable regulatory background, environmental setting, impacts associated with the proposed project, and mitigation measures designed to reduce significant impacts where required and when feasible. The residual impacts following the implementation of any mitigation measure are also discussed.

### Organization of Environmental Analysis

To assist the reader with comparing information between environmental issues, each section is organized under the following headings:

- Regulatory Background
- Environmental Setting
- Thresholds of Significance
- Environmental Impacts
- Cumulative Impacts
- Level of Significance Before Mitigation
- Mitigation Measures
- Level of Significance After Mitigation
- References

### Terminology Used in This Draft EIR

The level of significance is identified for each impact in this DEIR. Although the criteria for determining significance are unique for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

## 5. Environmental Analysis

- **No impact.** The project would not change the environment.
- **Less than significant.** The project would not cause any substantial, adverse change in the environment.
- **Less than significant with mitigation incorporated.** The EIR includes mitigation measures that avoid substantial adverse impacts on the environment.
- **Significant and unavoidable.** The project would cause a substantial adverse effect on the environment, and no feasible mitigation measures are available to reduce the impact to a less than significant level.

## 5. Environmental Analysis

### 5.1 HISTORICAL RESOURCES

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 significant for their engineering, architecture, cultural use or 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.

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the proposed Old Schoolhouse Removal project to impact historical resources. The analysis in this section is based in part on the below technical reports.

- *Historic Resource Assessment Report*, Pam Daly M.S.H.P, Daly and Associates, March 2016

A complete copy of this study is included as Appendix F to this DEIR.

#### 5.1.1 Regulatory Background

##### 5.1.1.1 FEDERAL

###### National Historic Preservation Act

The National Historic Preservation Act of 1966 authorized the National Register of Historic Places and coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources.

Section 106 (Protection of Historic Properties) of the act 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 Preservation, an independent federal agency, administers the review process with assistance from state historic preservation offices.

###### National Register of Historic Places

The National Register of Historic Places (NRHP) is authorized by the Historic Sites Act of 1935 (Code of Federal Regulations, Title 36, Section 60.2) 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." It is the nation's official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archeology, engineering, and culture. The NRHP recognizes resources of local, state, and national significance that have been documented and evaluated according to uniform standards and criteria.

## 5. Environmental Analysis

### HISTORICAL RESOURCES

The NRHP includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The NRHP is administered by the National Park Service. Properties are nominated to the NRHP by the State Historic Preservation Officer of the state in which the property is located, by the Federal Preservation Officer for properties under federal ownership or control, or by the Tribal Historic Preservation Officer if a property is on tribal lands.

To be eligible for listing in the National Register, resources must meet at least one of the following criteria:

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

In addition, unless a property possesses exceptional significance, it must be at least 50 years old to be eligible for National Register listing. It must also retain sufficient integrity to convey its historic significance. The seven aspects of integrity are location, design, setting, materials, workmanship, feeling, and association. To retain its historic integrity, a property must possess several, and usually most, of these aspects.

- **Location.** A place where the historical property was constructed or the place where the historic event occurred.
- **Design.** The elements that create the form, plan, space, structure, and style of the property.
- **Setting.** The physical environment of the historic property.
- **Materials.** The physical elements used, combined, or deposited during a particular period of time, and in a particular pattern, configuration, or style to form a historic property.
- **Workmanship.** The physical evidence of crafts or a particular culture, people, or person during any given period of history or prehistory.
- **Feeling.** The expression of the property through aesthetic or historic means of a particular period of time.
- **Association.** The direct link between a historic event or person and a historic property.

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### 5.1.1.2 STATE

#### California Register of Historical Resources

The State Historical Resources Commission has designed the California Register of Historic Resources (CRHR) program for use by state and local agencies, private groups and citizens to identify, evaluate, register and protect California's historical resources. The CRHR is the authoritative guide to the state's significant historical and archeological resources.

The CRHR program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA. Certain resources are determined via statute (PRC 5024.1<sup>1</sup>) to be automatically included in the California Register:

- California properties listed on the National Register of Historic Places and those formally determined eligible for the National Register of Historic Places.
- California Registered Historical Landmarks from No. 770 onward.
- California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.

The criteria for eligibility for the CRHR are based upon the National Register criteria. To be eligible for listing in the CRHR, a resource must meet at least one of the following criteria:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation. (PRC Section 5024.1[c])

In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired or significant individuals made their important contributions. Integrity is the authenticity of a historical resource's physical identity as evidenced by the survival of characteristics or historic fabric that existed during the resource's period of significance. Alterations to a resource or changes in its use over time may have historical, cultural, or

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<sup>1</sup> 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. (PRC 5024.1).

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architectural significance. Simply, resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR, if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data.

#### California Public Resources Code

Historical sites are protected pursuant to a wide variety of state policies and regulations enumerated under the California PRC.

- **PRC Sections 5020–5029.5** continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The Commission oversees the administration of the CRHR and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.
- **PRC Sections 5079–5079.65** define the functions and duties of the Office of Historic Preservation, which is responsible for the administration of federally and state-mandated historic preservation programs in California and the California Heritage Fund.

#### 5.1.1.3 LOCAL

Historical resources include properties listed or formally determined to be eligible for listing in the CRHR or local historic register. A local register consists of resources that are officially designated or recognized as historically significant by a local government, pursuant to a resolution, ordinance, or other discretionary approval. The Azusa Unified School District does not have adopted policy concerning designation or maintenance of potential historical resources. The City of Azusa has adopted goals, policies, and plans concerning the designation and preservation of potential historical resources, which are discussed below, but they are not applicable to District property, including the Old Schoolhouse.

#### Azusa General Plan

The City of Azusa General Plan provides the City's goals, policies, and implementation programs on the City's historic resources and landscapes. Potential Historic Landmarks and Potential Historic Districts are shown on Figure HR-1, *Potential Historic Landmarks and Potential Historic Districts* of the General Plan. A total of 58 potential historic landmarks are listed, and three potential historic districts are identified: Sunset/San Gabriel Historic District, Downtown Historic District, and the Foothill Historic District. The project site is not within a historic district, but is identified by the City of Azusa as a potential historic landmark on its Survey List of Historic Properties.

#### Azusa Municipal Code

Chapter 55 of the Azusa Municipal Code is the City's historic preservation ordinance. The City's Cultural and Historic Preservation commission has the responsibility to recommend to the City Council the adoption of ordinances and resolutions designating improvements, sites, or natural features as historic landmarks, historic districts, potential historic landmarks, and potential historic districts—thereby necessitating their preservation,



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protection, enhancement, rehabilitation or perpetuation. The City Council may establish historic landmarks and historic districts via the following methods:

- Owner application for any improvement, site, natural feature, or grouping thereof that meets one or more of the designation criteria, and is on the owner's property.
- Commission by initial identification of nomination for potential historic landmarks and potential historic districts that meet criteria set forth in the historic preservation ordinance but do not have written consent of the property owner.

No application for historic landmark or historic district nominations shall be accepted without the written consent of the owner of the property to which the nomination pertains; without consent of the property owner, the property can only be nominated as a "potential" historic landmark or district. According to the City of Azusa, the Old Schoolhouse structure is potentially historic and has been listed on the City's Survey List of Historic Properties, because the District has not consented to the official designation of the property. The Old Schoolhouse is not on the City's Historic Landmarks list.

### 5.1.2 Environmental Setting

#### 5.1.2.1 GROWTH OF THE CITY OF AZUSA

In the 1860s, Jonathan Sayre Slauson purchased the 13,000-acre "Rancho Azusa de Dalton" from Henry Dalton. Out of his investment, Slauson created the communities of Azusa, Covina, and Glendora. Slauson also created a reliable source of irrigation by forming the Azusa Land and Water Company, which made the land highly valued for planting citrus groves. In 1887, the Los Angeles and San Gabriel Railroad Company (a subsidiary of the Atchison, Topeka and Santa Fe Railroad) ran a line east toward Glendora. The railroad lines gave citrus growers a direct connection with retail and wholesale markets on the East Coast. The City of Azusa was incorporated in 1908 and had a population approaching 1,400 residents. After World War II the city started moving away from an agrarian economy and into modern technological industries.

#### 5.1.2.2 EDUCATION IN AZUSA

The first school constructed to serve the residents of Slauson's rancho lands was a simply made structure of earthen floors, shake roof, and brush and willow rod walls. Center Grammar school was noted as being the first schoolhouse in Azusa and was constructed in 1872/1875. Within the City of Azusa limits, the Azusa City School District was formed in 1888. In 1905, Azusa constructed the Citrus Union High School.

The Riley School was constructed to serve as the city's first kindergarten. Local historians believe the original Riley School was constructed between 1903 and 1910. A date of 1903 would correspond with the 50th anniversary of the death of Brevet Major-General Bennet Riley of the U.S. Army, for whom the school may have been named. Riley School was situated on 4th Street, between Pasadena and Soldana Avenues. The campus was greatly enlarged in 1919, and the old Riley School kindergarten wood-frame building was attached to the larger Spanish Revival-style school building. The kindergarten building was remodeled and enlarged with a three-room addition in 1929 to accommodate a growing population in Azusa.

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### HISTORICAL RESOURCES

When the new facilities at Riley School were constructed, the older wood-frame schoolhouse appears to have housed Azusa's Mexican children. The population of Mexican workers in Southern California, including Azusa, had grown in the early 1900s due to the need for manual laborers in the citrus groves and packinghouses. Many communities educated the children of the permanent and seasonal residents in elementary schools that were "separate but equal." The Riley School continued to be used as the "Mexican School" until the federal case of *Mendez vs. Westminster School District* in 1947 mandated California public school districts to integrate schools.

In 1946, the old Riley Schoolhouse was moved to the grounds of Slauson Middle School (i.e., project site) and was used "as a warehouse and maintenance depot for the district" (Daly 2016). In 1955, the newer Riley School on 4th Street was demolished.

#### 5.1.2.3 OLD SCHOOLHOUSE

The Old Schoolhouse, the former Riley Schoolhouse, is a single-story, rectangular-massed, wood-frame building in the southeast corner of Slauson Middle School campus, with the street address of 403 North Angelino Avenue in Azusa. The building measures approximately 56 feet long by 34 feet wide overall. The main block of the building has a medium-pitched gable roof set on an east-west axis. The roof and walls of the structure are supported by wood posts attached to plywood boards that enclose the crawlspace between the ground and bottom sill of the building. The entire building is clad with thin wood clapboards, with no visible saw marks (see Figure 4-3, *Old Schoolhouse*, for photos of the building).

#### Exterior

The main entrance into the building is on the east elevation, at the south end of the façade, under an awning supported by round metal posts. Concrete steps lead to the front door, and red brick planters were constructed on each side of the steps. The awning support posts are set in the red brick planters. A large window opening is situated to the north of the front door, but is covered over with plywood. The exterior door at the northwest corner of the building, on the north elevation, appears to be the only door that dates prior to 1946, when the schoolhouse building was moved from its prior site to the current location.

The main defining features of the building are the three sets of large, paired, jointed bi-fold casement windows on the north and south elevations that would have provided light to the classroom area of the building. Each window sash consists of four small, square, fixed lights, set two on top of two, at the top of the sash.

#### Interior

The original classroom area would have been the width of the building and approximately 40 feet long. The cupboards in the larger "bedroom" would have been part of the classroom area. The interior of the classroom portion of the building appears to have its original wood plank wall cladding, although in some areas the wall boards have been covered with a liner and/or painted over (see Figure 5-1, *Interior of the Old Schoolhouse*). The original interior walls are character-defining features along with the original classroom supply cupboards; however, the interior of the building was rearranged with false walls when a caretaker lived in the

Figure 5-1 - Interior of the Old Schoolhouse  
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View of the north wall of the main classroom room. Notice the condition of the ceiling, walls, floor, and window fixtures.



View of the kitchen and pantry area in the northwest corner of the building. Notice condition of the kitchen amenities and surfaces.

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building. The floors and ceilings in the classroom are mostly intact, except for some water damage in the eastern portion of the building. The ceiling was “dropped” in the kitchen and rear area of the building. The kitchenette appears to be in its original condition, as teachers would need the small sink space, and the bathroom appears to have been updated when the building was used for housing.

The exterior of the Old Schoolhouse building was remodeled in 1929 and currently presents a Craftsman-style exterior. Minor alterations were made to the interior and exterior of the building when it was moved to its current location in 1946. The original exterior of the building was remodeled in 1929 with altered rooms added to the north and south elevations, but the additions have since been removed. The windows appear to date from the late 1920s, confirming that the Riley School building had been renovated. The bi-fold casement windows may have replaced the original sets of large, double-hung windows that could have been cumbersome to open. A shed roof addition was constructed along the rear of the schoolhouse that appears to date from the 1929 renovations. It appears there were extensions, or ells, constructed off of the rear of the building, as evidenced by the false gable ends on the upper portion of both the north and south exterior walls at the rear of the building. The west-facing slope of the shed roof was matched by an east slope on the now removed ells. According to the Historic Resources Assessment, historic aerial photographs show that the ells were removed before the building was moved to its current location.

### 5.1.3 Thresholds of Significance

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 an 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 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- C-4 Disturb any human remains, including those interred outside of dedicated cemeteries.

The Initial Study, included as Appendix A, substantiates that impacts associated with the following thresholds would be less than significant:

- Threshold C-2
- Threshold C-3
- Threshold C-4

These impacts will not be addressed in the following analysis.

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#### 5.1.4 Environmental Impacts

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.1-1: Removal of the Old Schoolhouse—via relocation and rehabilitation in conformance with the Secretary’s Standards or its demolition—would cause a potentially significant adverse change to the building’s historical significance. [Threshold C-1]**

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***Impact Analysis:*** The Old Schoolhouse and former Riley School property are not listed in the National Register of Historic Places or California Register of Historic Resources. However, the Old Schoolhouse is eligible for listing in the CRHR as a historical resource under Criteria 1 and 3.

- **Criterion 1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.**

The Old Schoolhouse has made a significant contribution to the early history of education of children, and appears to be the oldest and last remaining one-room schoolhouse in Azusa and the San Gabriel Valley. It is associated with an important time of local history, as it housed segregated Mexican and Latino children before the District was required by a federal court ruling to integrate them with the rest of the school population in 1947. Additionally, the District acknowledges the historical connection of the Old Schoolhouse building to the community in Resolution #05-06:30. Therefore, the Old Schoolhouse is eligible for listing in the California Register under Criteria 1.

- **Criterion 3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.**

Though the Old Schoolhouse may have been constructed as early as 1903, it is eligible for listing in the California Register under Criterion 3 as an example of a one-room schoolhouse dating from 1929. The Old Schoolhouse building has retained important levels of integrity of materials, workmanship, design, feeling, and association. While the building has not retained its original integrity of setting and location, its current setting and location on a property that functions as an educational facility has created for the building a relationship with its historic location. The building’s design (massing and fenestration) clearly demonstrate its original use as a one-room schoolhouse—a rare example in Los Angeles County. The exterior of the building has retained a substantial amount of its historic architectural integrity from the 1929 remodel using the Craftsman style of architecture. The interior of the building has also retained a substantial level of physical integrity. Overall, the building successfully conveys its ability to present its historic significance of early education in Azusa.

According to the CEQA Guidelines, a project would result in a significant impact to historical resources if it would materially impair a historical resource (CEQA Guidelines Section 15064.5[b][1]). Impairment occurs if the historical resource is demolished or materially altered in an adverse manner in its physical characteristics of features that convey the historical significance and justify its inclusion in or eligibility for inclusion in the California Register of Historical Resources (CEQA Guidelines Section 15064.5[b][2]). The CEQA Guidelines

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also specify a means of evaluating the relative significance of project impacts on historical resources. CEQA Guidelines Section 15064.5(b)(3) states:

Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

Compliance with the Secretary's Standards indicates that a project may have a less than significant impact on a historical resource. The converse of this does not hold; that is, failure to comply with the Secretary's Standards does not, by definition, result in a significant impact under CEQA. CEQA recognizes that alterations that are not consistent with the Secretary's Standards may still not result in significant impacts to the historical resource. Therefore, the significance of project impacts on a historical resource can be evaluated by determining:

- Whether a project is in conformance with the Secretary's Standards (less than significant impact).
- Whether a project is in substantial conformance with the Secretary's Standards and does not result in material impairment (less than significant impact, with mitigation if required).
- Whether a project is not in conformance with the Secretary's Standards and results in material impairment (significant impact).

Project implementation would result in either the relocation, rehabilitation, and reuse of the Old Schoolhouse structure consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties or the demolition of the Old Schoolhouse structure.

**Sell the Old Schoolhouse Option.** This option would allow the building to be relocated and rehabilitated in conformance with Secretary Standards. Under this project option, the Old Schoolhouse structure would be preserved for current and future generations. This activity in and of itself would result in a less than significant impact to the historical resource. However, it is possible that the ultimate reuse of the rehabilitated building is not for education and/or civic purposes. Therefore, without a means to memorialize the Old Schoolhouse's contribution to the early history of educating children in the Azusa area, impacts would be potentially significant.

**Demolish the Old Schoolhouse Option.** The option to demolish the Old Schoolhouse structure if a successful buyer is not identified or if the structure is not removed from the project site by a specified deadline would materially impair the significance of the historical resource. According to CEQA Guidelines Section 15064.5(b)(2), the potential demolition of the Old Schoolhouse structure would result in a significant and adverse impact.

Redevelopment of the project site with either landscaping or parking would not result in a significant impact to the historic resource. The Old Schoolhouse operated at the former Riley School on 4th Street, between Soldano Avenue and Pasadena Avenue, before relocating to its current location in 1946; minimal

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improvements have been made to the structure's new site. Additionally, after its relocation, the structure was used as a caretaker's home and storage. The project site is not historically significant, and its redevelopment with landscaping or parking would not impact a historical resource.

**Level of Significance before Mitigation:** Based on the analysis above, Impact 5.1-1 under both project options to sell the Old Schoolhouse or demolish the structure would be potentially significant.

#### 5.1.5 Cumulative Impacts

The proposed project would have a cumulatively considerable effect on historical resources, if the project and related projects were both historically significant under the same criteria and conditions, and their alterations were inconsistent with the Secretary of the Interior's Guidelines for the Treatment of Historic Properties, Standards for the Rehabilitation.

No related projects have been identified in the City of Azusa (see Section 4.3). However, even if there were, a cumulatively considerable effect under the conditions described in the previous paragraph would be highly unlikely. The District is not aware of any buildings in the City that are related to the education of students (Criterion 1) or are historically significant one-room school buildings (Criterion 3) that are proposed for demolition. Therefore, implementation of the proposed project in conjunction with related projects in the City would not result in a cumulative considerable impact.

A search performed by the South Central Coastal Information Center (California State University, Fullerton) of one-room schoolhouses recorded in Los Angeles County identified two other properties. The result does not mean that there are not more one-room schoolhouses remaining in the county, but that one-room schoolhouses are very rare. The proposed alteration of the Old Schoolhouse structure, if inconsistent with the Secretary's Standards (i.e., demolition option), would further reduce the supply of rare examples of one-room schoolhouses and would result in a cumulatively considerable impact on historically significant one-room schoolhouses in Los Angeles County.

#### 5.1.6 Level of Significance Before Mitigation

Implementation of applicable regulations listed in Section 5.1.1 would not reduce the impact to historical resources to less than significant. Without mitigation, Impact 5.1-1 would be **potentially significant**:

- **Impact 5.1-1** The proposed option to demolish the Old Schoolhouse would cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5.

#### 5.1.7 Mitigation Measures

##### Impact 5.1-1

CUL-1 Prior to the removal of the Old Schoolhouse building—via relocation and rehabilitation in conformance with the Secretary's Standards or demolition—the District shall retain qualified individuals to document the facility using the Historic American Building Survey (HABS)



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Level III standards as a guideline for recording the building through a compilation of photographs, drawings, and written description to record the historic resource:

- **Written Data:** The history of the property and description of the historic resource shall be prepared. The Historic Resource Assessment Report of The Old Schoolhouse (DEIR Appendix F) may be used.
- **Drawings:** A sketch plan of the interior floorplan of the building shall be prepared.
- **Photographs:** Large-format photographs and negatives shall be produced to capture interior and exterior views of the Old Schoolhouse structure. At least two large format pictures shall be taken to show the building's setting in context and in relationship to its location. The photographs and negatives must be created using archival stable paper and processing procedures.
- **Document:** The HABS Level III document must be produced on archival-quality paper, and all large format photographs and negatives labeled to HABS standards. A digital version of the HABS document shall be prepared with the hard copy. The final HABS Level III document shall be donated to the Azusa Historical Society and/or other responsible repository within the San Gabriel Valley.

### 5.1.8 Level of Significance After Mitigation

**Sell the Old Schoolhouse Option.** As discussed under Impact 5.1-1, the potential sale, relocation, and rehabilitation of the Old Schoolhouse building would follow the Secretary of the Interior's Guidelines for the Treatment of Historic Properties and Standards for Rehabilitation, and impacts to the historical resource would be less than significant. However, because the potential reuse of the structure might not be related to an education and/or civic function, the potential detachment of the building from its historical setting of an educational campus would be potentially significant. Implementation of CUL-1 would memorialize the historical significance of the structure's contribution to the early history of educating children in Azusa. Therefore, impacts under this option would be mitigated to less than significant.

**Demolish the Old Schoolhouse Option.** Implementation of CUL-1 would not reduce or eliminate the adverse effects from the potential material alteration caused by demolition of the Old Schoolhouse building. According to CEQA Guidelines Section 15126.4(b)(2), documentation of a historical resource by way of a historic narrative, photographs, or architectural drawings would not mitigate the effects of demolition of the resource to a point where clearly no significant effect on the environment would occur. Therefore, under this project option, impacts to historical resources would be significant and adverse.

### 5.1.9 References

Azusa, City of. 2014, May. Tenth Street Center Industrial Park Environmental Impact Report. Accessed September 28, 2015. <http://www.ci.azusa.ca.us/DocumentCenter/View/26907>.

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———. 2015. Azusa TOD Specific Plan Draft EIR, 4.3 Cultural Resources.  
<http://www.ci.azusa.ca.us/DocumentCenter/View/29994>.

———. 2018, January 17. Code of Ordinances. Accessed April 26, 2018.  
[https://library.municode.com/ca/azusa/codes/code\\_of\\_ordinances?nodeId=10418](https://library.municode.com/ca/azusa/codes/code_of_ordinances?nodeId=10418).

Chou, Christopher. 2014, September 30. “AB 52 Amends CEQA by Creating a New Category of Cultural Resources and New Requirements for Consultation with Native American Tribes.”  
<https://www.californialandusedevelopmentlaw.com/2014/09/30/ab-52-amends-ceqa-by-creating-a-new-category-of-cultural-resources-and-new-requirements-for-consultation-with-native-american-tribes/>.

Daly, Pamela. 2016, March. Final Historic Resource Assessment Report of The Old Schoolhouse 403 North Angelino Avenue, Azusa Unified School District, Azusa, Los Angeles County, CA. Daly and Associates. (DEIR Appendix F)

Los Angeles County. 2015, April. Entrada South Project.  
[http://www.scvhistory.com/nlf\\_entradasouth\\_deir\\_5-5.pdf](http://www.scvhistory.com/nlf_entradasouth_deir_5-5.pdf).

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### 5.2 TRIBAL CULTURAL RESOURCES

This section of the Environmental Impact Report (EIR) evaluates the potential for implementation of the Old Schoolhouse removal to impact tribal cultural resources. This section discusses state laws and regulations protecting resources, along with the existing cultural resource conditions on and near the project site.

The analysis in this section is based in part on the following technical report.

- *Historic Resource Assessment Report*, Pam Daly M.S.H.P, Daly and Associates, March 2016

A complete copy of this study is included as Appendix F to this DEIR.

#### 5.2.1 Regulatory Background

##### 5.2.1.1 FEDERAL

###### National Register of Historic Places

The National Register of Historic Places recognizes properties that are significant at the national, state, and/or local levels and includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Properties are nominated to the National Register by the State Historic Preservation Officer of the state in which the property is located, by the Federal Preservation Officer for properties under federal ownership or control, or by the Tribal Historic Preservation Officer if a property is on tribal lands.

The criteria for listing in the National Register follow the standards for determining if properties, sites, districts, structures, or landscapes of potential significance are eligible for nomination. In addition to meeting any or all of the following criteria, properties nominated must also possess integrity of location, design, setting, feeling, workmanship, association, and materials:

- Associated with events that have made a significant contribution to the broad patterns of history.
- Associated with the lives of persons significant in our past.
- Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- Yield, or may be likely to yield, information important in prehistory or history.

###### National Historic Preservation Act

The National Historic Preservation Act supplements the provisions of the Antiquities Act of 1906 and established laws for historic resources to “preserve important historic, cultural, and natural aspects of our national heritage, and to maintain, wherever possible, an environment that supports diversity and a variety of

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### TRIBAL CULTURAL RESOURCES

individual choice.” The law makes it illegal to destroy, excavate, or remove from federal or Indian lands any archaeological resources without a permit from the land manager. Regulations for the ultimate disposition of materials recovered as a result of permitted activities state that archaeological resources excavated on public lands remain the property of the United States. Archaeological resources excavated from Indian lands remain the property of the Indian or Indian tribe having rights of ownership over such resources.

#### **American Indian Religious Freedom Act**

The American Indian Religious Freedom Act of 1978 (AIRFA) proclaims that the US Government will respect and protect the rights of Indian tribes to freely exercise their traditional religions. The courts have interpreted this as requiring agencies to consider the effects of their actions on traditional religious practices.

#### **Archaeological Resources Protection Act**

The Archaeological Resources Protection Act (US Code, Title 16, Sections 470aa-mm) became law on October 31, 1979, and has been amended four times. It regulates the protection of archaeological resources and sites that are on federal and tribal lands.

#### **Native American Graves Protection and Repatriation Act**

The Native American Graves Protection and Repatriation Act (US Code, Title 25, Sections 3001 et seq.) is a federal law passed in 1990 that provides a process for 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 and culturally affiliated Indian tribes.

### 5.2.1.2 STATE

#### **California Register of Historical Resources**

The California Register of Historical Resources is the state version of the National Register. The California Register was enacted in 1992 and became official January 1, 1993. It was established to serve as an authoritative guide to the state’s significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. According to subsection (c) of Public Resources Code (PRC) Section 5024.1, a resource may be listed as a historical resource in the California Register if it meets any of the four National Register criteria, listed above.

#### **Native American Historic Resource Protection Act**

The Native American Historic Resource Protection Act (AB 52) took effect July 1, 2015, and incorporates tribal consultation and analysis of impacts to tribal cultural resources (TCR) into the CEQA process. It requires TCRs to be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California tribes. Where a project may have a significant impact on a TCR, the lead agency’s environmental document must discuss the impact and whether feasible alternatives or mitigation measures could avoid or substantially lessen the impact.

## 5. Environmental Analysis TRIBAL CULTURAL RESOURCES

TCRs must have certain characteristics:

- 1) Sites, features, places, cultural landscapes (must be geographically defined), sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources. (PRC § 21074(a)(1))
- 2) The lead agency, supported by substantial evidence, chooses to treat the resource as a TCR. (PRC § 21074(a)(2))

The first category requires that the TCR qualify as a historical resource according to PRC Section 5024.1. The second category gives the lead agency discretion to qualify that resource—under the conditions that it support its determination with substantial evidence and consider the resource’s significance to a California tribe. The following is a brief outline of the process in PRC Sections 21080.3.1 to 3.3.

- 1) A California Native American tribe asks agencies in the geographic area with which it is traditionally and culturally affiliated to be notified about projects. Tribes must ask in writing.
- 2) Within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it.
- 3) A tribe must respond within 30 days of receiving the notification if it wishes to engage in consultation.
- 4) The lead agency must initiate consultation within 30 days of receiving the request from the tribe.
- 5) Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a TCR, OR a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached.
- 6) Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on TCRs and discuss feasible alternatives or mitigation that avoid or lessen the impact.

### Native American Historic Resource Protection Act

Public Resources Code Sections 5097 et seq. codify the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal public lands. PRC Section 5097.9 states that no public agency or private party on public property shall “interfere with the free expression or exercise of Native American Religion.” The code further states that:

No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine... except on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, except for parklands larger than 100 acres.

PRC Section 5097.9 and Health and Safety Code Section 7050 authorize the Native American Heritage Commission (NAHC) to regulate Native American concerns regarding the excavation and disposition of

## 5. Environmental Analysis

### TRIBAL CULTURAL RESOURCES

Native American cultural resources. Among its duties, the NAHC is authorized to resolve disputes relating to the treatment and disposition of Native American human remains and items associated with burials. Upon notification of the discovery of human remains by a county coroner, the NAHC notifies the Native American group or individual most likely descended from the deceased.

#### 5.2.1.3 LOCAL

##### **Azusa General Plan**

The City of Azusa General Plan outlines policies and programs to preserve and protect the City's Native American heritage and to encourage the Native American community to play a role in community development, including through serving on the Cultural and Historic Preservation Commission. It also provides goals, policies, and implementation programs on historic resources and landscapes. The City contains 58 potential historic landmarks and 3 potential historic districts—Sunset/San Gabriel Historic District, Downtown Historic District, and the Foothill Historic District. The Old Schoolhouse is not listed as a potential historic landmark or within a historic district.

##### **Azusa Municipal Code**

Chapter 55, Articles I and II of the City's Municipal Code include the creation of a cultural and historic preservation commission to ensure that the historic preservation regulations included in Sections 55-2 through 55-53 of the Municipal Code are enforced. The guiding mission of this ordinance is

The protection, appreciation and preservation of the cultural and historic resources of the city shall be the guiding mission and fundamental purpose of the cultural and historic preservation commission. The cultural and historic preservation commission shall work in partnership with other governmental agencies, property owners/residents, the business sector and the community at large to retain and protect those cultural and historic resources which will preserve and enhance the community.

## 5.2.2 Environmental Setting

### 5.2.2.1 TRIBAL CULTURAL SETTING

The project area is within the traditional boundaries of the Gabrieleño Indians. In 1994, the Gabrieleño tribe was recognized by the State of California as the aboriginal tribe of the Los Angeles basin. Their territory extends eastward to the San Bernardino/Riverside area, southward to Aliso Creek in Orange County, northward to the San Gabriel mountains, and westward to the coast into the Channel Islands. The Gabrieleños are regarded as one of the most influential Native American groups in southern California. The project site is specifically within the Gabrieleño Band of Mission Indians—Kizh Nation's ancestral territory.

Historians, ethnographers, archaeologists, and anthropologists have identified Gabrieleño resources in the City of Azusa, including a prehistoric village known as Ashuukshanga near Pioneer Park, approximately 1.5 miles northeast of the project site. Gabrieleño villages date back to late prehistoric and protohistoric periods and were based on clan or lineage groups. Within the Gabrieleño territory, tribal artifacts have been unearthed (i.e., monos, metates, bone or rock tools, shell jewelry, cogstones, soapstone jewelry, or soapstone effigies) as

## 5. Environmental Analysis TRIBAL CULTURAL RESOURCES

well as human remains of Native American ancestors. Other cultural artifacts may include, but are not limited to shell, bone, ceramic, stone, ceremonial items, items of cultural patrimony that reflect traditional religious beliefs and practices, and funerary objects.

### 5.2.2.2 RECORDS SEARCHES, NATIVE AMERICAN HERITAGE COMMISSION

A sacred lands file search conducted by the NAHC for the project site did not identify any sacred lands. The NAHC identified five local Native American representatives as potentially having local knowledge:

- Gabrieleño Band of Mission Indians – Kizh Nation
- Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Gabrieleño/Tongva Nation
- Gabrieleño Tongva Indians of California Tribal Council
- Gabrieleño-Tongva Tribe

PlaceWorks notified all five tribal representatives about the proposed project on October 27, 2017, and requested information about known potential resources at or near the project site. On October 28, 2017, the District received a response from the Gabrieleño Band of Mission Indians–Kizh Nation, who asked to discuss the proposed project via phone. It should be noted that the District has not received any formal consultation requests from Native American tribes (see DEIR Appendix G, *Tribal Coordination*). The tribal representative, Andrew Salas, indicated that the tribes desire to understand the extent of grading and whether project development would result in disturbance of native soils.

The five tribes were notified of the Notice of Preparation of an Environmental Impact Report for the proposed Old Schoolhouse Removal project, and on May 8, 2018, the Gabrieleño Band of Mission Indians–Kizh Nation responded with a request for a tribal monitor during any and all ground disturbances. No other tribes have responded to the letter or requested consultation at this time.

### 5.2.3 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- TCR-1 Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- TCR-2 A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

## 5. Environmental Analysis

### TRIBAL CULTURAL RESOURCES

The Initial Study, included as Appendix A, states that impacts to tribal cultural resources were determined to be below established thresholds of significance. However, based on a comment letter received from the Gabrieleño Band of Mission Indians-Kizh Nation requesting tribal monitoring, Impacts 5.2-1 and 5.2-2 have been analyzed further in this EIR.

#### 5.2.4 Environmental Impacts

The following impact analysis examines project impacts compared to thresholds of significance, which are identified in brackets after the impact statement.

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**Impact 5.2-1:** The proposed removal of the Old Schoolhouse would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, pursuant to criteria in Public Resources Code Section 5024.1(c), or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). [Thresholds TCR-1 and TCR-2]

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**Impact Analysis:** The Old Schoolhouse structure is listed in the City of Azusa's Survey List of Historic Properties, but it is not on the City's official Historic Landmark list. Nevertheless, in accordance with PRC Section 5024.1(c), the Old Schoolhouse is eligible for listing on the California Register under Criteria 1 and 3 (see Impact 5.1-1). Its eligibility is based on the building's association with the early education of children in the City of Azusa and the structure being the oldest and last remaining one-room schoolhouse in Azusa and the San Gabriel Valley. The Old Schoolhouse eligibility for listing is not for association with a Native American tribe or as a potential tribal cultural resource. Although the building is eligible for listing in the California Register, pursuant to criteria in PRC Section 5024.1(c), its proposed removal would not adversely affect the significance of a tribal cultural resource.

**Level of Significance before Mitigation.** Based on the analysis above, Impact 5.2-1 would result in a less than significant impact to tribal cultural resources.

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**Impact 5.2-2:** Soil-disturbing activities for the proposed project may encounter undiscovered tribal cultural resources. [Threshold TCR-2]

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**Impact Analysis:** The project site has been identified by the Gabrieleño Band of Mission Indians-Kizh Nation as being within their geographic area and as potentially culturally sensitive to the Gabrieleño people. In a letter dated May 8, 2018, the Gabrieleño Band of Mission Indians-Kizh Nation requested tribal member monitoring during all ground-disturbing activities at the project site.

The Old Schoolhouse structure is supported by wood post footings, and the removal of the structure and footings would require minimal soil disturbance. Capping utilities on the site and installing landscaping or parking would disturb soil, but likely no more than 24 inches deep. The project site was previously graded during construction of Slauson Middle School, and project implementation would not require deep excavations. Consequently, it is unlikely that implementation of the proposed improvements would result in discovery of subsurface resources. However, as discussed in Sections 5.5(b) and 5.17(b) of the Initial Study (see DEIR Appendix A), in the event that subsurface resources are uncovered, the District will comply with



## 5. Environmental Analysis TRIBAL CULTURAL RESOURCES

CEQA Guidelines Section 15064.5, which provides that work in the area of a discovery shall be suspended until a qualified archaeologist can assess the significance of the find, and, if necessary, develop appropriate avoidance and/or recovery. In light of Kizh Nation's request for a tribal monitor and the fact that a prehistoric village has been discovered approximately 1.5 miles northeast of the site, the District concurs that any accidental discovery of tribal cultural resources would be potentially significant.

***Level of Significance before Mitigation.*** Based on the analysis above, Impact 5.2-2 would be potentially significant.

### 5.2.5 Cumulative Impacts

Each related cumulative project would be required to comply with CEQA Guidelines Section 15064.5, which addresses accidental discoveries of archaeological sites and resources, including tribal cultural resources. Therefore, any discoveries of TCRs caused by the project or related projects would be mitigated to a less than significant level. Project impacts would not be cumulatively considerable.

### 5.2.6 Level of Significance Before Mitigation

Upon implementation of regulatory requirements, Impact 5.2-1 would result in a less than significant impact.

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

- **Impact 5.2-2** Soil disturbance activities could result in accidental discovery of tribal cultural resources.

### 5.2.7 Mitigation Measures

#### Impact 5.2-2

TCR-1 In the event of an accidental discovery of subsurface items during soil disturbance construction activities, the District shall immediately retain a qualified registered professional archaeologist (RPA) to evaluate the potential resource and make a finding of significance under Section 15064.5 of the California Environmental Quality Act Guidelines. If the RPA determines that the potential resource is of tribal cultural significance, the RPA shall contact liaisons for local Native American tribes, including but not limited to the Gabrieleño Band of Mission Indians–Kizh Nation and their Native Monitor. The RPA and Native Monitor shall assess the find and, as appropriate, develop a plan for recovery, analysis, report, and/or curation of the item to the appropriate entity or Native American tribe. The find shall be reported to an accredited and permanent scientific institution, such as the South Central Coastal Information Center.

## 5. Environmental Analysis

### TRIBAL CULTURAL RESOURCES

#### 5.2.8 Level of Significance After Mitigation

Mitigation Measure TCR-1 would reduce potential impacts associated with tribal cultural resources to a level that is less than significant. Therefore, no significant unavoidable adverse impacts relating to recreation remain.

#### 5.2.9 References

Daly, Pamela. 2016, March. Final Historic Resource Assessment Report of The Old Schoolhouse 403 North Angelino Avenue, Azusa Unified School District, Azusa, Los Angeles County, CA. Daly and Associates. (DEIR Appendix F)

## 6. Significant Unavoidable Adverse Impacts

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Pursuant to Section 15126.2(b) of the CEQA Guidelines, this section describes the significant environmental effects that cannot be avoided if the proposed Old Schoolhouse removal project were implemented. As summarized in Table 1-1 of Chapter 1, *Executive Summary*, and detailed in Section 5.1, *Historical Resources*, the proposed option to demolish the Old Schoolhouse would result in one significant and adverse impact under the environmental category of Historical Resources:

- **Impact 5.1-1** The proposed project would cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5.

Mitigation Measure CUL-1 has been identified to reduce the impact on Impact 5.1-1:

CUL-1 Prior to the removal of the Old Schoolhouse building—via relocation and rehabilitation in conformance with the Secretary’s Standards or demolition—the District shall retain qualified individuals to document the facility using the Historic American Building Survey (HABS) Level III standards as a guideline for recording the building through a compilation of photographs, drawings, and written description to record the historic resource:

- **Written Data:** The history of the property and description of the historic resource shall be prepared. The Historic Resource Assessment Report of The Old Schoolhouse (DEIR Appendix E) may be used.
- **Drawings:** A sketch plan of the interior floorplan of the building shall be prepared.
- **Photographs:** Large-format photographs and negatives shall be produced to capture interior and exterior views of the Old Schoolhouse structure. At least two large format pictures shall be taken to show the building’s setting in context and in relationship to its location. The photographs and negatives must be created using archival stable paper and processing procedures.
- **Document:** The HABS Level III document must be produced on archival-quality paper, and all large format photographs and negatives labeled to HABS standards. A digital version of the HABS document shall be prepared with the hard copy. The final HABS Level III document shall be donated to the Azusa Historical Society and/or other responsible repository within the San Gabriel Valley.

Implementation of CUL-1 would not reduce or eliminate the adverse impacts of the proposed option that would materially alter the Old Schoolhouse building. According to CEQA Guidelines Section 15126.4(b)(2), documentation of a historical resource by way of a historic narrative, photographs or architectural drawings as mitigation for the effects of demolition of the resource will **not** mitigate the effects to a point where

## 6. Significant Unavoidable Adverse Impacts

clearly no significant effect on the environment would occur. The only means to eliminate an adverse effect on a historical resource is to make alterations consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Weeks and Grimmer 1995), which would mitigate impacts on historical resources to below a level of significance (CEQA Guidelines Section 15126.4[b][1]). Therefore, implementation of the proposed option to demolish the Old Schoolhouse would constitute a substantial adverse change in the significance of a historical resource; under this option, impacts to historical resources would be significant and unavoidable.

## 7. Alternatives to the Proposed Project

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The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

For a project that will materially impair a historical resource, CEQA Guidelines Section 15064.5 states that the lead agency must “identify potentially feasible measures to mitigate significant adverse changes in the significance of a historical resource.” “Feasible” is defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors” (Public Resources Code Section 21061.1). Factors that may be taken into account when addressing the feasibility of alternatives (as described in CEQA Guidelines Section 15126.6[f][1]) are site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdiction boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.

The EIR need only identify alternatives necessary to permit a reasoned choice. It need not consider every conceivable alternative to a project. Rather, the alternatives must be limited to ones that meet the project objectives, are ostensibly feasible, and would avoid or substantially lessen a significant environmental effect. Of the alternatives considered, the EIR need only examine in detail those that the Lead Agency determines could feasibly attain most of the basic objectives of the project (CEQA Guidelines Section 15126.6 [f]).

For the proposed project’s impact on a historical resource, project alternatives that are designed to comply in part or in full with standards for the treatment of historic properties would avoid or substantially lessen historic resource impacts. “Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer, the project’s impact on historical resources shall generally be considered mitigated below a level of significance and thus is not significant” (CEQA Guidelines Section 15126.4[b][1]).

### 7.1 PURPOSE OF ALTERNATIVES

Key provisions of the CEQA Guidelines on project alternatives (Sections 15126.6[a] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.

## 7. Alternatives to the Proposed Project

- “The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly” (15126.6[b]).
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact” (15126.6[e][1]).
- “The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (15126.6[e][2]).
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project” (15126.6[f]).
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).
- “For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (15126.6[f][2][A]).
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (15126.6[f][3]).

## 7.2 APPROACH

### Evaluation of Project Alternatives

For each development alternative, the analysis

- Describes the alternative to the proposed project.
- Analyzes the impact of the project alternative as compared to the proposed project; per CEQA Guidelines Section 15126.6(d), significant effects of alternatives shall be discussed, but in less detail than the proposed project.
- Identifies the significant environmental impacts of the project that would be avoided or lessened by the project alternative.

## 7. Alternatives to the Proposed Project

- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.

### Project Objectives

Project objectives—as described in Section 3.2—will aid decision makers in their review of the project, project alternatives, and associated environmental impacts. The proposed project’s objectives are listed below again for reference:

1. Ensure public welfare and safety of Slauson Middle School occupants and surrounding community.
2. Reduce District liability associated with the Old Schoolhouse, a non-Field Act compliant structure.
3. Reduce District exposure by eliminating safety hazards and hazardous materials.
4. Ensure wise and efficient use of public resources.
5. Improve aesthetics of Slauson Middle School and surrounding community.
6. Ensure prudent and responsible spending of limited District funds.
7. Minimize or eliminate, if possible, costs associated with the Old Schoolhouse.
8. Maximize useable space at Slauson Middle School.
9. Consider the feasibility for preservation or adaptive reuse of the Old Schoolhouse.
10. Develop mitigation to reduce or eliminate, if possible, significant effects, if preservation and/or adaptive reuse is determined infeasible.

### 7.3 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are clearly infeasible. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (CEQA Guidelines Section 15126[f][3]). This section identifies alternatives considered by the lead agency, but rejected as infeasible, and provides a brief explanation of the reason for their exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects (CEQA Guidelines Section 15126.6[c]).

## 7. Alternatives to the Proposed Project

### 7.3.1 Reconstruct the Old Schoolhouse In-Situ

In December 2016, the District sought a school architect to reconstruct the Old Schoolhouse for school use. According to the architect, the current conditions of the building would require a full demolition; salvaging any parts of the building would be costlier than their replacement. The architect also noted the foundation was installed for temporary use, and new footings would be required in compliance with current codes. Therefore, the architect recommended to demolish the building and rebuild it using salvaged elements (fascia boards, plaques, fixtures, finishes). The plans would be submitted to DSA as a new building. A rendering of this alternative is shown in Figure 7-1, *Replacement Schoolhouse*.

The cost to reconstruct the Old Schoolhouse, which is approximately 1,500 square feet, could range between \$400 and \$600 per square foot. Depending on bidding conditions and final design requirements, the new building could cost up to \$900,000, not including site improvements such as sidewalk, fencing, landscaping, ramps, stairs, etc. Final costs may exceed \$1,000,000 (including soft costs); see Appendix H, *Cost Estimate*. This alternative would not be in conformance with Secretary's Standards, and mitigation identified for the proposed project would also need to be implemented, the cost of which is approximately \$10,000. Impacts on the historical significance of the Old Schoolhouse under this alternative would remain significant and adverse.

## 7.4 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

The following four project alternatives have been determined to represent a reasonable range of alternatives which have the potential to attain most of the basic objectives of the project but which may avoid or substantially lessen any of the significant effects of the project.

- No Project
- Mothball the Old Schoolhouse In-Situ
- Rehabilitate for Adaptive Reuse of the Old Schoolhouse In-Situ
- Relocate to Another District Property and Rehabilitate for Reuse

### 7.4.1 No Project

The No Project Alternative, which is required by CEQA, would maintain the project site in its current condition. The Old Schoolhouse structure and surrounding fence would not be removed, and the District would not install landscaping or a new parking lot on the project site. Under this alternative and similar to existing conditions, the District would continue to replace/reinstall a tarp over the structure's roof to minimize structural damage from inclement weather. Due to the unstable nature of the Old Schoolhouse, the cost to purchase the tarp and install it has been about \$3,000. The District has not allocated other funds to maintain the Old Schoolhouse. Similar to existing conditions, under this alternative, the structure would continue to fall into disrepair. Neither the District, City, nor community have made efforts to improve the Old Schoolhouse over the last decade.



Figure 7-1 - Replacement Schoolhouse  
7. Alternatives



## 7. Alternatives to the Proposed Project

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## 7. Alternatives to the Proposed Project

### Impact to Historical Resource

Although maintenance is considered preservation under the Secretary's Standards, there is currently no maintenance, stabilization, or mothballing implementation plan that directly limits deterioration of the Old Schoolhouse. Under the No Project Alternative, the structure would continue to deteriorate, which is evidenced with paint stripping from interior and exterior walls and the ceiling; water damage in the eastern portion of the building; and dropped ceiling in the kitchen and rear area of the building. This alternative would allow the historical resource to fall further into disrepair and is not considerably better than the proposed project. Although this alternative would avoid demolishing the Old Schoolhouse, its indirect deterioration caused by deferred maintenance would continue to significantly and adversely impact the historical resource.

### Conclusion

While this alternative is neither environmentally superior nor inferior to the proposed project in the area of historical resources, this alternative would not improve the aesthetics of Slauson Middle School or the surrounding residential community.

The No Project Alternative would not meet any of the project objectives:

1. Ensure public welfare and safety of Slauson Middle School occupants and surrounding community.
2. Reduce District liability associated with the Old Schoolhouse, a non-Field Act compliant structure.
3. Reduce District exposure by eliminating safety hazards and hazardous materials.
4. Ensure wise and efficient use of public resources.
5. Improve aesthetics of Slauson Middle School and surrounding community.
6. Ensure prudent and responsible spending of limited District funds.
7. Minimize or eliminate, if possible, costs associated with the Old Schoolhouse.
8. Maximize useable space at Slauson Middle School.
9. Consider the feasibility for preservation or adaptive reuse of the Old Schoolhouse.
10. Develop mitigation to reduce or eliminate, if possible, significant effects, if preservation and/or adaptive reuse is determined infeasible.

### 7.4.2 Mothball the Old Schoolhouse In-Situ

Under this alternative, the Old Schoolhouse building would remain in its current location, but would be "mothballed" in accordance with the National Park Service's Technical Preservation Brief #31, "Mothballing Historic Buildings," included as Appendix I to the DEIR. Mothballing the Old Schoolhouse building would

## 7. Alternatives to the Proposed Project

prevent it from further deterioration until additional funding became available for a feasible alternative, such as the “rehabilitate and reuse” alternative in Section 7.4.3. Mothballing can protect a building for up to 10 years; long-term success would depend on continued monitoring and maintenance.

This mothballing alternative would close the Old Schoolhouse building temporarily to protect it from weather and secure it from vandalism. Physical repairs would be made prior to securing the building. Mothballing would ensure that the roofs are watertight, that the drainage of the building would not result in damage, that pests and nests have been removed from the building, that the electrical wiring of the building is safe, that the building is secure, and that the building is well ventilated. Under this alternative, the following steps would be implemented to mothball the Old Schoolhouse building:

### Documentation

- Document the architectural and historical significance of the building, which has been completed; see Appendix F of the DEIR.
- Prepare a condition assessment of the building, which would include full detail of all interior and exterior architectural features of the building. The cost for such an assessment of the Old Schoolhouse is roughly \$10,000.

### Stabilization

- Structurally stabilize the building, based on a professional condition assessment.
- Exterminate or control pests, including termites and rodents.
- Protect the exterior from moisture penetration.

### Mothballing

- Secure the building and its component features to reduce vandalism or break-ins.
- Provide adequate ventilation to the interior, such as the standard of care published by the U.S. Army Corps of Engineers and Heating and Ventilating Contractor’s Association.
- Secure or modify utilities and mechanical systems.
- Develop and implement a maintenance and monitoring plan for protection due to basic casualty events (i.e., fire, security, weather).

Preparing the building for mothballing should be undertaken with the assistance of a qualified historic architect or architectural historian with training in methods of historic building conservation. The cost to mothball the facility is roughly 10 percent of the rehabilitation budget, or approximately \$37,804. With the cost to prepare a condition assessment of the Old Schoolhouse, the total cost of the Mothballing Alternative would be \$47,804. Mothballing would take approximately one to two months, presumably over the 2019 summer break. The mothballing alternative would delay the proposed landscaping and/or parking lot improvements at the campus until a final decision is made about the Old Schoolhouse.

## 7. Alternatives to the Proposed Project

### Impact to Historical Resource

Under the mothballing alternative, the Old Schoolhouse building would be protected from direct adverse physical changes (i.e., demolition or substantial alterations) and indirect adverse changes (i.e., continued building deterioration caused by deferred maintenance). Therefore, impacts to the historical resource under this alternative would be less than significant.

### Conclusion

The mothballing alternative is environmentally superior to the proposed project in the area of historical resources. Although the Old Schoolhouse building would be stabilized and improved for mothballing, the structure would not be improved to Field Act standards, and the fence surrounding the building would remain for public safety purposes and to discourage trespassing. Therefore, this alternative would not significantly enhance the aesthetics of Slauson Middle School or the surrounding residential community.

This alternative would not meet 9 of the 10 project objectives:

1. Ensure public welfare and safety of Slauson Middle School occupants and surrounding community.
2. Reduce District liability associated with the Old Schoolhouse, a non-Field Act compliant structure.
3. Reduce District exposure by eliminating safety hazards and hazardous materials.
4. Ensure wise and efficient use of public resources.
5. Improve aesthetics of Slauson Middle School and surrounding community.
6. Ensure prudent and responsible spending of limited District funds.
7. Minimize or eliminate, if possible, costs associated with the Old Schoolhouse.
8. Maximize useable space at Slauson Middle School.
10. Develop mitigation to reduce or eliminate, if possible, significant effects, if preservation and/or adaptive reuse is determined infeasible.

### 7.4.3 Rehabilitate for Adaptive Reuse of the Old Schoolhouse In-Situ

Under this rehabilitation alternative, the Old Schoolhouse structure would not be demolished, and the footprint of the structure would not be improved with landscaping for extension of the Slauson Middle School lawn or with a new parking lot. The Old Schoolhouse would be stabilized in its current location for low-impact reuse, including but not limited to office space, part-time museum, and/or educational facility for Slauson Middle School. This alternative would be implemented in accordance with Secretary Standards for the treatment of historic properties, as well as applicable California Historical Building Code requirements, and Division of the State Architect requirements for structural safety and Field Act compliance. Under this

## 7. Alternatives to the Proposed Project

alternative, the existing fencing surrounding the building would be removed, and students and staff of District would be able to occupy the Old Schoolhouse building.

This alternative would include improvements to the Old Schoolhouse, specified in a Preliminary Report of Current Conditions of the Old Schoolhouse prepared in August 2015 (see Appendix J, *Preliminary Report of Current Conditions of Old Schoolhouse*):

- Demolish brick planters, front entrance canopy, concrete stoops at the front and rear of the building.
- Construct new, period-appropriate, wood stoops with ADA-approved ramps.
- Seismic retrofit: anchor building to masonry foundation.
- Seismic retrofit: repair concrete foundation piers.
- Repair and/or replace wood siding and trim.
- Repair and replace roof framing.
- New plywood diaphragm at roof.
- Install new composition roof and new flashing.
- Install new forced air unit in attic.
- Remove existing exterior paint. Caulk, prep, prime, and paint exterior.
- New landscaping and irrigation at grade.
- New site lighting.
- New security system.
- New utilities to site.
- Seismic retrofit: add shear blocking between roof and walls.
- Repair windows and doors.
- Replace missing historic window units.
- Interior finish repair and paint.
- New subfloor.
- Replace electrical, lighting, and plumbing systems, including sewer.

## 7. Alternatives to the Proposed Project

- Interior demolition of non-contributing/nonhistorical walls, floors, closets, cabinets, and plumbing fixtures.
- Install new basic plumbing fixtures.
- Install new basic floor treatment.

Should this alternative be implemented, a Historic Structures Report (HSR) would be required to document current conditions, as they may have changed from 2015, and confirm that the improvements proposed under this alternative are fully consistent with the Secretary's Standards and Guidelines. The cost to prepare the HSR would be about \$10,000. According to the 2015 Preliminary Report of Current Conditions, the cost to implement the above improvements was \$361,014 in 2015 dollars (\$378,038 in 2018 [Bureau of Labor Statistics]). Assuming conditions have not changed substantially and no additional improvements are required, the total cost to implement this Alternative in 2018 dollars would be \$388,038. This alternative would take approximately two months to complete and could be done over the 2019 summer break.

### Impact to Historical Resource

Alterations made under this adaptive reuse alternative would be consistent with Secretary's Standards. Therefore, impacts to the historical resource would be less than significant.

### Conclusion

This adaptive reuse alternative is environmentally superior to the proposed project in the area of historical resources. This alternative would not meet 2 of the 10 project objectives:

6. Ensure prudent and responsible spending of limited District funds.
7. Minimize or eliminate, if possible, costs associated with the Old Schoolhouse.

### 7.4.4 Relocate to Another District Property and Rehabilitate for Reuse

CEQA requires analysis of alternative project locations. The key question and first step in such an analysis is to determine whether the significant effects of the project would be avoided or substantially lessened by implementing the project at another site (CEQA Guidelines 15126.6[f][2]). For the proposed project, the question would be whether relocating the Old Schoolhouse building to a different site would reduce the project's significant and adverse impact on historical resources. The Old Schoolhouse, which was relocated from its original location to its existing location on Slauson Middle School, would be relocated to Center Middle School, at 5500 North Cerritos Avenue, which is approximately 1.2 miles southeast of the project site. The Old Schoolhouse would be placed on the northeastern corner of Center Middle School between the school's playing field to the west and single-family residential homes to the east. The northeastern corner of Center Middle School is accessible via a driveway from East Gladstone Street, west of the East Gladstone Street and North Rockvale Avenue intersection.

## 7. Alternatives to the Proposed Project

As stated in Section 7.2, a less than significant finding on proposed alterations to historical resources can be made only if the alterations are consistent with the Secretary's Standards for Treatment of Historic Properties. On this basis, the impact of relocating the Old Schoolhouse to another site, if executed in accordance with Secretary Standards, would be less than significant.

However, relocation alone would not reduce the significant impact to a level below significance. If the Old Schoolhouse collapsed or was irreparably damaged during the relocation process, the impact would be considered significant and unavoidable. Also, if the Old Schoolhouse was left as-is after relocation, impacts to the historical resource would remain significant and adverse. To eliminate the significant impact, the Old Schoolhouse would also need to be maintained after its relocation and/or improved under the Secretary Standards. Rehabilitation of the structure is discussed below in Section 7.4.3, *Rehabilitate for Adaptive Reuse of the Old Schoolhouse In-Situ*.

The cost to relocate the Old Schoolhouse structure would be between \$12,000 and \$15,000, based on the distance to the receiving site and potential site improvements for its placement. The cost to rehabilitate the structure for potential reuse is \$388,038 (see Section 7.4.3). Therefore, the cost to relocate and rehabilitate the Old Schoolhouse for reuse could be up to \$403,038 (\$15,000 + \$388,038).

### Impact to Historical Resource

Under this alternative, the Old Schoolhouse would be protected from direct adverse physical changes (i.e., demolition) and indirect adverse changes (i.e., continued deterioration of the building cause by the deferment of maintenance). Rehabilitation of and alternations to the Old Schoolhouse would be consistent with the Secretary's Standards. Thus, impacts to the historical resource would be less than significant. However, since there is the potential for the structure to be damaged during movement, this alternative is considered to have a significant and adverse impact.

### Conclusion

Even with the potential for a significant and adverse impact associated with movement of the building, this alternative is environmentally superior to the proposed project in the area of historical resources. This alternative would meet all but the following 2 of the 10 project objectives:

6. Ensure prudent and responsible spending of limited District funds.
7. Minimize or eliminate, if possible, costs associated with the Old Schoolhouse.

## 7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that an "environmentally superior" alternative be identified. Table 7-1, *Comparison of Proposed Project and Alternative Options*, shows each alternative's environmental impacts compared to the proposed project as environmentally superior, neutral, or inferior. Table 7-1 also shows the anticipated cost for each project and alternative options.



## 7. Alternatives to the Proposed Project

**Table 7-1 Comparison of Proposed Project and Alternative Options**

|  | Rough Cost   | Historical Impact     | Comparison |
|--|--------------|-----------------------|------------|
| Proposed Option to Sell + Lawn <sup>1</sup>                                  | \$61,000     | Less than Significant | N/A        |
| Proposed Option to Sell + Parking Lot <sup>1</sup>                           | \$111,000    | Less than Significant | N/A        |
| Proposed Option to Demolish + Lawn <sup>1</sup>                              | \$70,000     | Significant           | N/A        |
| Proposed Option to Demolish + Parking Lot <sup>1</sup>                       | \$120,000    | Significant           | N/A        |
| Relocate to Another District Property Alternative <sup>1</sup>               | \$25,000     | Significant           | =          |
| Relocate to Another District Property and Rehabilitate for Reuse Alternative | \$403,038    | Less than Significant | ++         |
| Reconstruct the Old Schoolhouse In-Situ Alternative <sup>1</sup>             | \$1,010,000  | Significant           | =          |
| No Project Alternative (Required by CEQA) <sup>2</sup>                       | \$3,000/year | Significant           | =          |
| Mothball the Old Schoolhouse In-Situ Alternative <sup>3</sup>                | \$47,804+    | Less than Significant | ++         |
| Rehabilitate for Adaptive Reuse of the Old Schoolhouse In-Situ Alternative   | \$388,038    | Less than Significant | ++         |

<sup>1</sup> Cost includes implementation of Mitigation Measures HIST-1 and TCR-1

<sup>2</sup> Does not include maintenance costs.

<sup>3</sup> Does not include future cost to relocate and/or rehabilitate.

= Alternative is neither environmentally inferior nor superior to the proposed project.

++ Alternative is environmentally superior to the proposed project.

Although three alternatives are identified as environmentally superior to the proposed project, the District’s decision-making body is not required to select any of them for approval. It may move forward with approval of the proposed project, as described in Chapter 3. However, doing so would require the District Board of Education to make findings consistent with CEQA Guidelines Section 15091 and adopt a Statement of Overriding Considerations (SOC) (CEQA Guidelines Section 15093) if a buyer is not identified or the buyer cannot remove the Old Schoolhouse prior to the removal deadline, and the building is ultimately demolished. Adoption of the SOC would require the Board to balance the benefits of the proposed project against the potential loss of the Old Schoolhouse. If the Board finds the benefit of the proposed project outweighs the unavoidable adverse effect, then the significant impact on the historical structure may be considered “acceptable” (CEQA Guidelines Section 15093), and the Board may then approve the proposed project.

## 7. Alternatives to the Proposed Project

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## 8. Impacts Found Not to Be Significant

California Public Resources Code Section 21003 (f) states: "...it is the policy of the state that...[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." This policy is reflected in the State California Environmental Quality Act (CEQA) Guidelines (Guidelines) Section 15126.2(a), which states that "[a]n EIR [Environmental Impact Report] shall identify and focus on the significant environmental impacts of the proposed project" and Section 15143, which states that "[t]he EIR shall focus on the significant effects on the environment." The Guidelines allow use of an Initial Study to document project effects that are less than significant (Guidelines Section 15063[a]). Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant, and were therefore not discussed in detail in the Draft EIR.

### 8.1 ASSESSMENT IN THE INITIAL STUDY

The Initial Study prepared for the proposed project in April 2018 determined that impacts listed below would be less than significant. Consequently, they have not been further analyzed in this DEIR. Please refer to Appendix A of the DEIR for explanation of the basis of these conclusions. Impact categories and questions below are summarized directly from the CEQA Environmental Checklist, as contained in the Initial Study.

Note that the Initial Study determined that project impacts to Tribal Cultural Resources was less than significant. However, based on the comment received from the Gabrieleño Band of Mission Indians—Kizh Nation requesting a tribal monitor during ground disturbance, potential impacts associated with the request were analyzed in the DEIR.

**Table 8-1 Impacts Found Not to Be Significant**

| Environmental Issues   | Initial Study Determination  |
|--|------------------------------|
| <b>I. AESTHETICS. Would the project:</b>   |                              |
| a) Have a substantial adverse effect on a scenic vista?  | No Impact                    |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | No Impact                    |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings?  | Less Than Significant Impact |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?                                    | Less Than Significant Impact |

## 8. Impacts Found Not to Be Significant

**Table 8-1 Impacts Found Not to Be Significant**

| Environmental Issues   | Initial Study Determination  |
|--|------------------------------|
| <b>II. AGRICULTURE AND FOREST RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project: |                              |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?   | No Impact                    |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?   | No Impact                    |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?   | No Impact                    |
| d) Result in the loss of forest land or conversion of forest land to non-forest use?   | No Impact                    |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?   | No Impact                    |
| <b>III. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:   |                              |
| a) Conflict with or obstruct implementation of the applicable air quality plan?  | No Impact                    |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?   | Less Than Significant Impact |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?  | Less Than Significant Impact |
| d) Expose sensitive receptors to substantial pollutant concentrations?   | Less Than Significant Impact |
| e) Create objectionable odors affecting a substantial number of people?  | Less Than Significant Impact |
| <b>IV. BIOLOGICAL RESOURCES.</b> Would the project:  |                              |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?   | Less Than Significant Impact |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?   | No Impact                    |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?   | No Impact                    |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?   | Less Than Significant Impact |

## 8. Impacts Found Not to Be Significant

**Table 8-1 Impacts Found Not to Be Significant**

| Environmental Issues  | Initial Study Determination    |
|---|--------------------------------|
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?   | No Impact                      |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?  | No Impact                      |
| <b>V. CULTURAL RESOURCES. Would the project:</b>  |                                |
| a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?  | Potentially Significant Impact |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?   | Less Than Significant Impact   |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?   | Less Than Significant Impact   |
| d) Disturb any human remains, including those interred outside of formal cemeteries?  | Less Than Significant Impact   |
| <b>VI. GEOLOGY AND SOILS. Would the project:</b>  |                                |
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:  | No Impact                      |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | No Impact                      |
| ii) Strong seismic ground shaking?  | No Impact                      |
| iii) Seismic-related ground failure, including liquefaction?  | No Impact                      |
| iv) Landslides?   | No Impact                      |
| b) Result in substantial soil erosion or the loss of topsoil?   | Less Than Significant Impact   |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?  | No Impact                      |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?  | No Impact                      |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?  | No Impact                      |
| <b>VII. GREENHOUSE GAS EMISSIONS. Would the project:</b>  |                                |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?   | Less Than Significant Impact   |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?  | No Impact                      |
| <b>VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>  |                                |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?   | Less Than Significant Impact   |
| b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?   | Less Than Significant Impact   |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?   | Less Than Significant Impact   |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?  | No Impact                      |

## 8. Impacts Found Not to Be Significant

**Table 8-1 Impacts Found Not to Be Significant**

| Environmental Issues  | Initial Study Determination  |
|---|------------------------------|
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?  | No Impact                    |
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?   | No Impact                    |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?   | No Impact                    |
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?  | No Impact                    |
| <b>IX. HYDROLOGY AND WATER QUALITY. Would the project:</b>  |                              |
| a) Violate any water quality standards or waste discharge requirements?   | Less Than Significant Impact |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | No Impact                    |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in a substantial erosion or siltation on- or off-site   | Less Than Significant Impact |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?   | Less Than Significant Impact |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?  | Less Than Significant Impact |
| f) Otherwise substantially degrade water quality?   | No Impact                    |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?  | No Impact                    |
| h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?   | No Impact                    |
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?  | No Impact                    |
| j) Inundation by seiche, tsunami, or mudflow?   | No Impact                    |
| <b>X. LAND USE AND PLANNING. Would the project:</b>   |                              |
| a) Physically divide an established community?  | No Impact                    |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?   | No Impact                    |
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan?   | No Impact                    |
| <b>XI. MINERAL RESOURCES. Would the project:</b>  |                              |
| a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?   | No Impact                    |
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?   | No Impact                    |

## 8. Impacts Found Not to Be Significant

**Table 8-1 Impacts Found Not to Be Significant**

| Environmental Issues  | Initial Study Determination  |
|---|------------------------------|
| <b>XII. NOISE. Would the project result in:</b>   |                              |
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?   | Less Than Significant Impact |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?   | Less Than Significant Impact |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?  | No Impact                    |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?  | Less Than Significant Impact |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?   | No Impact                    |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?  | No Impact                    |
| <b>XIII. POPULATION AND HOUSING. Would the project:</b>   |                              |
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?   | No Impact                    |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?   | No Impact                    |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?   | No Impact                    |
| <b>XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</b> |                              |
| a) Fire protection?   | No Impact                    |
| b) Police protection?   | No Impact                    |
| c) Schools?   | No Impact                    |
| d) Parks?   | No Impact                    |
| e) Other public facilities?   | No Impact                    |
| <b>XV. RECREATION.</b>  |                              |
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?  | No Impact                    |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?   | No Impact                    |
| <b>XVI. TRANSPORTATION/TRAFFIC. Would the project:</b>  |                              |
| a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?                         | Less Than Significant Impact |
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?  | Less Than Significant Impact |

## 8. Impacts Found Not to Be Significant

**Table 8-1 Impacts Found Not to Be Significant**

| Environmental Issues   | Initial Study Determination    |
|--|--------------------------------|
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?  | No Impact                      |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?   | No Impact                      |
| e) Result in inadequate emergency access?  | Less Than Significant Impact   |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?   | No Impact                      |
| <b>XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:</b>  |                                |
| a) Exceed waste water treatment requirements of the applicable Regional Water Quality Control Board?   | No Impact                      |
| b) Require or result in the construction of new water or waste water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?  | No Impact                      |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?  | Less Than Significant Impact   |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed?  | Less Than Significant Impact   |
| e) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?  | No Impact                      |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?   | Less Than Significant Impact   |
| g) Comply with federal, state, and local statutes and regulations related to solid waste?  | No Impact                      |
| <b>XIV. MANDATORY FINDINGS OF SIGNIFICANCE.</b>  |                                |
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | Potentially Significant Impact |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)   | No Impact                      |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?  | No Impact                      |
| d) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term goals?   | No Impact                      |



## 9. Significant Irreversible Changes Due to the Proposed Project

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Section 15126.2(c) of the CEQA Guidelines requires that an Environmental Impact Report (EIR) describe any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. Implementation of the proposed project would result in the permanent loss of the Old Schoolhouse, a building that meets CEQA's definition of a historical resource. The building footprint of the Old Schoolhouse would be landscaped or used for parking.

Project implementation would require the commitment of limited resources, including: 1) fuel and operational materials/resources, and 2) the transportation of goods and people to and from the project site. The proposed project would require aggregate materials used in concrete and asphalt, such as sand and stone; water; petrochemical construction materials such as plastic; petroleum-based construction materials; and other similar slowly renewable or nonrenewable resources. Additionally, fossil fuels for vehicles and equipment would also be consumed. The consumption of such resources would represent a long-term commitment of those resources; however, it would not be considered substantial.

## 9. Significant Irreversible Changes Due to the Proposed Project

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# 10. Growth-Inducing Impacts of the Proposed Project

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Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also required is an assessment of other projects that would foster other activities which could affect the environment, individually or cumulatively. To address this issue, potential growth-inducing effects will be examined through analysis of the following questions:

- Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would this project result in the need to expand one or more public services to maintain desired levels of service?
- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this EIR.

**Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?**

The proposed project would not intensify land use and would not involve construction or extension of infrastructure facilities. The proposed project consists of the removal of a building and installation of landscaping or construction of a parking lot over the project site. No changes would be made to existing regulations pertaining to land development. As a result, the proposed project would not be growth inducing and would not remove any obstacles to growth.

## 10. Growth-Inducing Impacts of the Proposed Project

### **Would this project result in the need to expand one or more public services to maintain desired levels of service?**

As discussed in the Initial Study (Appendix A to this DEIR), the proposed project would not have a substantial effect on demand for any public services, including police and fire protection, parks, schools, and libraries. The proposed project would not increase the District's enrollment projections or seating capacity, or trigger a population increase within its attendance boundary. The proposed project would not be growth inducing with respect to the expansion of public services.

### **Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?**

Construction of the proposed project would result in a slight increase in jobs. However, the economic effects would be minor and temporary. As a result, the proposed project would not be growth inducing with respect to economic activities.

### **Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?**

Project implementation would not facilitate other activities that would affect the environment. Pressures to develop land would derive from regional economic conditions and market demands for housing, commercial, and industrial land uses that are not directly or indirectly influenced by the proposed project. Approval of the proposed project would not, therefore, encourage growth that would not otherwise occur.

# 11. Organizations and Persons Consulted

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## **Azusa Unified School District**

Marc Bommarito, Assistant Superintendent Business Services

## **City of Azusa**

Manuel Munoz, Associate Planner

## **Daly & Associates**

Pamela Daly, M.S.H.P., Senior Architectural Historian

## 11. Organizations and Persons Consulted

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## 12. Qualifications of Persons Preparing EIR

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### PLACEWORKS

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Associate Principal

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**Michael Paul**  
Project Planner

- BS, California Polytechnic State University San Luis Obispo, City and Regional Planning

**Jasmine Osman**  
Project Planner

- MCP, San Diego State University, City and Regional Planning
- BA, San Diego State University, Sustainability

## 12. Qualifications of Persons Preparing EIR

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## 13. Bibliography

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- Azusa, City of. 2014, May. Tenth Street Center Industrial Park Environmental Impact Report. Accessed September 28, 2015. <http://www.ci.azusa.ca.us/DocumentCenter/View/26907>.
- . 2015. Azusa TOD Specific Plan Draft EIR, 4.3 Cultural Resources. <http://www.ci.azusa.ca.us/DocumentCenter/View/29994>.
- . 2018, January 17. Code of Ordinances. Accessed April 26, 2018. [https://library.municode.com/ca/azusa/codes/code\\_of\\_ordinances?nodeId=10418](https://library.municode.com/ca/azusa/codes/code_of_ordinances?nodeId=10418).
- Chou, Christopher. 2014, September 30. “AB 52 Amends CEQA by Creating a New Category of Cultural Resources and New Requirements for Consultation with Native American Tribes.” <https://www.californialandusedevelopmentlaw.com/2014/09/30/ab-52-amends-ceqa-by-creating-a-new-category-of-cultural-resources-and-new-requirements-for-consultation-with-native-american-tribes/>.
- Daly, Pamela. 2016, March. Final Historic Resource Assessment Report of The Old Schoolhouse 403 North Angelino Avenue, Azusa Unified School District, Azusa, Los Angeles County, CA. Daly and Associates. (DEIR Appendix F)
- Los Angeles County. 2015, April. Entrada South Project. [http://www.scvhistory.com/nlf\\_entradasouth\\_deir\\_5-5.pdf](http://www.scvhistory.com/nlf_entradasouth_deir_5-5.pdf).

## 13. Bibliography

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