

G. CULTURAL RESOURCES

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This section examines both prehistoric and historic cultural resources within the City of Berkeley. Archaeological, prehistorical, historical and architectural information was obtained from a records search at the Information Center of the California Archaeological Inventory, Sonoma State University. This data for the City of Berkeley includes historic and prehistoric information, areas of prehistoric sensitivity, Native American cultural resources, a state historic properties listing, the National Register of Historic Places listing, a listing of historic bridges made by Caltrans, and Points of Historic Interest. Additional information on architectural resources and historic preservation programs within the City of Berkeley was obtained from City staff, the Berkeley Landmarks Preservation Commission and the Berkeley Architectural Heritage Association (BAHA).

1 Setting

a0 Native American Cultural Resources.

(1) Prehistory. The Native Americans inhabiting Berkeley dominated until the arrival of the Spanish in the 18th Century. Linguistic and archaeological evidence suggests that the ancestors of the Costanoan moved into the Bay Area at approximately 500 A.D. The Costanoan had a hunter/gather subsistence based economy. Their main food sources were acorns, berries, roots, deer, and grizzly bear, as well as the many varieties of waterfowl, fish, sea mammals, and shell fish found around San Francisco Bay. Though sedentary, the Costanoans made seasonal rounds and traded to collect the materials needed for their sustenance and material culture.¹

¹ Levy, Richard, 1978. *Costanoan*. In California, edited by Robert F. Heizer. Handbook of North American Indians, vol. 8, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D. C.

The term Costanoan is a linguistic one; it designates a language family consisting of eight languages. In 1770, the Costanoan-speaking people lived in approximately 50 separate and politically autonomous nations or tribelets. Each tribelet had one or more permanent village sites. The larger tribelets usually had several permanent villages, which were located in proximity to one another. During various seasons of the year, parties went out from the villages to temporary camps at scattered locations in the tribelet territory to engage in fishing, hunting, and collection of plant foods. The average number of persons in a tribelet was approximately 200, although tribelet population ranged from approximately 50 to 500 persons.²

The ethnic groups recognized by the Costanoan themselves were sets of tribelets who spoke a common language and lived in a contiguous area. Many of the tribelets within an ethnic area were distinguished from one another by slight differences of dialect. Chochenyo, or East Bay Costanoan, was spoken by about 2,000 people among the tribelets occupying the east shore of San Francisco Bay between Richmond and Mission San Jose, and probably also in the Livermore Valley.³

(2) Cultural Resources. Native American cultural resources in this portion of Alameda County tend to be located along historic bay margins, at or under broad alluvial fans, at the base of hills, and on broad midslope terrace, and always near seasonal and perennial sources of fresh water. Given the environmental setting of Berkeley and the existence of many of these natural features, a high potential for Native American cultural resources exists within the City limits.

b0 Historical Setting. By 1797, seven Spanish missions had been established within Costanoan Territory.⁴ European contact and missionization contributed to the depletion of the Costanoan population and brought about rapid cultural change. Many Costanoans and other Native Americans adapted to Spanish occupation by moving inland or working on one of the many Mexican ranchos, including one which encompassed what is now the City of Berkeley. Rancho San Antonio encompassed all of the land between San Francisco Bay and the crest of the Contra Costa Hills. This land was granted to Luis Maria Peralta in 1820. In 1842, the rancho lands were divided between the three sons of

² Ibid.

³ Ibid.

⁴ Ibid.

Luis Peralta, and the City of Berkeley lies within the portion given to Jose Domingo Peralta. Ranching was the main activity that took place on this land grant.⁵

By 1861, Berkeley began to emerge out of a small community known as Ocean View, generally located in what is now West Berkeley. Ocean View was an agricultural, commercial and industrial center primarily serving San Francisco and Oakland.

⁵ Hoover, Mildred Brooke; Rensch, Hero Eugene; Rensch Ethel; Abeloe, William N.. Revised by Kyle, Douglas E., 1990. *Historic Spots in California*. Fourth Edition. Stanford University Press.

The first telegraph line in the area was installed on Telegraph and Claremont Avenues in 1861, the same year as the establishment of Ocean View. The establishment of the University of California in 1873 provided the impetus for many newcomers to establish residency in the City. The subsequent rise of industry and commerce in Berkeley and surrounding cities prompted further growth of an already multi-ethnic community.⁶ The city of Berkeley was incorporated in 1878, following Ocean View's decision to merge with Berkeley.⁷

After the Mexican-American war, the United States claimed possession of and promoted homesteading in the area that contains South Berkeley. Between 1872 and 1892, the South Berkeley community grew as a local center of commercial activity and as a suburb of Oakland. The community became known as Lorin, the name of the railway stop at the intersection of Adeline Street and Alcatraz Avenue.⁸

Downtown Berkeley's industrial component developed quickly after 1878, when Francis Kittredge Shattuck bought a spur line of the Southern Pacific Railroad that terminated at what is now Berkeley Square. Downtown Berkeley's form and location are the result of transit patterns established at this time. The large width of Shattuck Avenue marks the location of the station, freightyards, and tracks, and University Avenue was the east-west horsecar route to Ocean View. Shattuck Avenue became the civic center as well as the business center of Berkeley, joining Ocean View with the campus community.⁹

⁶ *Sonoma State Cultural Resources Report*, 1995.

⁷ PAD, 1993. *West Berkeley Plan Draft EIR*.

⁸ Berkeley, City of, 1990. *South Berkeley Area Plan*.

⁹ Berkeley, City of, 1990. *Downtown Plan*.

In the early 1900s, dramatic changes and rebuilding reflected Berkeley's civic pride as the "Athens of the West." The growth and development was stimulated by the advent of the electric rail system which connected Berkeley with Oakland and San Francisco, the move of many San Franciscans into the East Bay after the 1906 earthquake, and the growth of the University of California. The 1920s saw more development in the Downtown area. A number of new buildings rose on Shattuck Square, which had been converted in 1923 from the Southern Pacific terminus into a commercial block.¹⁰ Another period of development occurred in the Downtown in the 1920s and 1930s. Street facade remodeling and small periods of development in the 1970s and 1980s were the only changes that occurred since the 1920s and 1930s,¹¹ until a series of new developments occurred in the 1990s. Development of the Downtown in the 1990s included several low-rise retail establishments, and multiple-unit residential buildings with ground floor retail and cultural uses.

c0 Historic Resources. The architectural character of Berkeley is varied and unique, containing a wide range of building ages, types and styles, from commercial landmark buildings in the Downtown, to industrial buildings using glass block accents, to varied examples of churches, theaters and civic buildings. Berkeley is also home to outstanding examples of numerous styles of residential architecture including Victorian homes, Mission-style bungalows, and Arts and Crafts homes.

Many historic buildings within the City of Berkeley are listed on state and federal registers. Many important historical buildings and sites throughout Berkeley have also been recognized and designated City landmarks by the Landmarks Preservation Commission. Some historical wharfs, landings and small house structures shown on historical maps may still be extant, or they may be archaeological sites that exist under new buildings. With all these factors in mind, a high potential for historical cultural resources exists throughout the project area, which is the City limits of Berkeley.¹²

(1) National Register of Historic Places. The *National Register of Historic Places* has specific criteria for evaluating the eligibility of historic resources. The criteria apply to the quality of significance in American history, architecture, archaeology, engineering, and culture as present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that: (a) are associated with events that have made a significant contribution to the broad patterns of our history; or (b) that are associated with the lives of persons significant in our past; or (c) that embody the distinctive characteristics of a

¹⁰ Ibid.

¹¹ Ibid.

¹² *Sonoma State Cultural Resources Report*, February 1995. File summary letter.

type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant distinguishable entity whose components may lack individual distinction; or (d) that have yielded or may be likely to yield information important in history or prehistory.¹³ The City of Berkeley currently has 48 properties listed on the National Register of Historic Places. This listing can be found in Appendix D.

(2) State Historic Resources Inventory. The *California Register of Historical Resources*, enacted in 1992, is an authoritative guide to be used to identify the state's historical resources. The California Register program encourages public recognition of resources of architectural, historical, archeological and cultural significance; identifies historical resources for state and local planning purposes; and defines threshold eligibility for state historic preservation grant funding. By law, properties may be added to the California Register in two ways. At this time, the California Register consists of resources that are listed automatically by status through the California Register enabling legislation (AB 2881). The California Register includes properties listed in, or formally determined eligible for, the National Register, and selected California Registered Historical Landmarks. Formal Guidelines and Procedures for the direct nomination of properties must be adopted by the State Historical Resources Commission before other resources can be added.

As an informational resource, the State Historic Preservation Office (SHPO) also maintains the *Directory of Properties in the Historic Property Data File*. This inventory is considered the most comprehensive list of historic properties for the State of California currently in existence. For historic resources in the City of Berkeley, this list is largely based on the *State Historic Resources Inventory*, which was prepared by the Berkeley Architectural Heritage Association (BAHA), a volunteer organization dedicated to preserving Berkeley's historic architectural heritage, from 1977 to 1979. Properties on this list are not protected or regulated, but merely designated for purposes of recognition.

This state survey produced a representative rather than a comprehensive inventory. The scope and reliability of the data within the listing varies depending upon the availability of information. Many properties exist which have been locally designated as City Landmarks or "Architecturally Significant" buildings that are not within the *Historic Property Data File* maintained by SHPO. The information contained in the SHPO directory indicates whether a property is listed in the National Register, or is determined eligible for listing in the National Register or through another federal agency. In addition, the State Historic Preservation Office must be consulted on any federally-assisted project which involves any building 50 years of age or older.

¹³ Code of Federal Regulations, Title 36, Part 60.

(3) Caltrans Bridge Survey. The California Department of Transportation (Caltrans) bridge inventory was begun in 1928 to regulate bridge safety and determine their weights and capacities. In 1984, an inventory was begun to evaluate bridges in terms of historic value. The total inventory of over 38,000 California bridges was trimmed to exclude bridges built after World War II (unless they are exceptional in some way), culverts, and freeway overpasses. The remaining several thousand bridges have been field checked and evaluated. Caltrans supplements this inventory annually to include newly built bridges. Caltrans now uses a five-category classification system for evaluating the historic value of bridges, with Category 1 being highly valuable, and Category 5 being of no historic value. The following list includes all bridges within the City of Berkeley that appear in the Caltrans listing.¹⁴

Bridge # 33C0146, Category 4 (Marin Avenue)
Bridge # 33C0261, Category 5
Bridge # 33C0262, Category 5
Bridge # 33C0263, Category 5

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Bart Aerial (C
Bart Aerial (I

¹⁴ Caltrans, 1989. *Historic Bridge Survey*.

(4) Points of Historical Interest. Alameda County keeps a list of points of historical interest within the County. The Berkeley vicinity was designated with Alameda County point of historical interest number ALA-002 on August 29, 1969, designating the site of the first adobe in Berkeley.¹⁵ The Historic Properties listing for the City of Berkeley lists this address as 1304 Albina Street.

(5) Designated City Landmarks. The State Historic Resources Inventory and the California Register of Historic Resources are actively used by the Landmarks Preservation Commission, citizens and developers when considering the designation of City landmarks and when evaluating changes to historic buildings. The State survey produced a representative rather than a comprehensive inventory of buildings. A complete listing of City Landmarks and Structures of Merit, their addresses, architects, and approximate dates of building is included in Appendix D. The State Inventory forms include detailed half-page narratives on the appearance and significance of each building surveyed as well as specific information on date, architect, use, and condition. In addition, each building is rated as to its eligibility to qualify for listing on the National Register of Historic Places.

d. Programs and Regulatory Setting. The following description of programs are intended to designate and protect cultural resources, Federal programs and regulations are addressed first, followed by State and local programs.

(1) Federal Regulatory Setting. As noted above, the City of Berkeley currently has 48 properties listed on the National Register of Historic Places. This listing can be found in Appendix D. The federal program provides the framing legislation and funding to the SHPO.¹⁶

(2) State Regulatory Setting.

¹⁵ *Sonoma State Cultural Resources Report*, February 1995. File summary letter.

¹⁶ Kavanaugh-Lynch, Margaret, City of Berkeley Planning and Development Department, July 1999. *Personal communication* with LSA Associates, Inc.

(a) *State Historic Building Code.* City-designated Landmark Structures, as well as those listed in the State Historic Resources Inventory, are regulated by the State Historic Building Code. This code outlines alternate building standards and regulations to encourage repairs and alterations that do not detract from the historic character of the structure.¹⁷

(b) *The Mills Act.* The Mills Act allows owners of qualified historic properties to enter into agreements with the City to rehabilitate their properties without increased tax assessments. The State Office of Historic Preservation provides information and assistance on tax credits available to owners of historic properties and administers programs and activities for preservation.¹⁸

(3) Local Programs.

(a) *Landmarks Preservation Ordinance.* In 1974, the Berkeley City Council adopted the Landmarks Preservation Ordinance (Chapter 3.24, *Berkeley Municipal Code*) in order to protect those structures, sites and areas that are:

- \$ Reminders of past eras, events, and persons important to local, state or national history;
- \$ Significant examples of architectural styles of the past;
- \$ Landmarks in the history of architecture, unique or irreplaceable assets to the City and its neighborhoods.¹⁹

The Landmarks Preservation Commission, described below, was established by the City Council to implement the Landmarks Preservation Ordinance.

(b) *Landmarks Preservation Commission.* The Berkeley City Council established the volunteer Landmarks Preservation Commission and appoints its nine members who are charged with preventing unnecessary destruction of buildings of architectural, historic and aesthetic significance using the following powers:

¹⁷ Berkeley, City of, Landmarks Preservation Commission, 1995. *Historic and Architectural Preservation in Berkeley* (pamphlet).

¹⁸ Ibid.

¹⁹ Ibid.

- \$ Identification of architecturally, historic and aesthetically significant properties, and designation as landmarks or structures of merit;
- \$ Review of the exterior design of proposed additions and alterations to landmarks and structures of merit. Review of demolition permits for landmarks and structures of merit; and
- \$ Advisory review of demolition permits for non-residential buildings over 40 years of age.²⁰

To date, the Landmarks Preservation Commission (Commission) has designated 298 buildings as local landmarks and structures of merit. A complete listing of the City of Berkeley Designated Landmarks and Structures of Merit is included in Appendix D. As shown in Figure IV.G-1 most City landmarks and Structures of Merit are located in the Downtown, north and south of the UC campus and in West Berkeley. Of these, 48 buildings are on the list of National Register of Historic Places, and one is on the list of State Historic Landmarks.

The Commission reviews proposed architectural changes to landmark buildings and structures of merit to ensure that these resources are not altered insensitively or lost, advising the Design Review Committee as to the appropriateness of demolition of or design changes to all non-residential buildings over 40 years old.

The Commission also maintains a list of properties which it considers eligible of landmark status, called the Priority List for Initiations.²¹ In addition, the Landmarks Preservation Commission provides advice as to the impact a proposed project may have on an adjacent or nearby landmark building. Finally, any Federally Assisted project which involves any building 50 years or older must be sent to the State Historic Preservation Office for review.

(c) *Landmark Designation.* A property may be initiated, i.e., proposed for designation as a landmark by the Commission, the property owner, the City Council, the Planning Commission or by the filing of a petition signed by 50 Berkeley residents. Once an application is submitted, the Commission holds a public hearing within 70 days of the filing of the application. The Commission may

²⁰ Ibid.

²¹ Ibid.

Figure IV.G-1: City landmarks

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then designate the structure, site, or area a landmark, a structure of merit, or, in the case of an area, a historic district. A designated Structure of Merit is not given the same protection status as a Designated Landmark.²² Designation of a historic district must be supported by at least 50 percent of the property owners of the proposed district.²³ Because the process for Landmark designation is based on individual requests and is not in any way systematic, the list of designated Berkeley Landmarks is not comprehensive.²⁴

e. Draft General Plan Policies. Policies included in the *Draft General Plan* that pertain to cultural and historic resources include:

§ *Policy LU-2*. Protect Berkeley character by identifying, restoring, and preserving historic buildings.

§ *Policy LU-7*. Preserve and protect the quality of life in Berkeley's residential areas through careful land use decisions.

Action:

A. Require that new development is consistent with zoning density standards and compatible with the existing scale, historic character and surrounding uses.

§ *Policy LU-24*. Require the highest quality architectural design for all downtown projects.

Action:

A. Ensure that all downtown area projects conform to the *Downtown Plan*, the Downtown Design Guidelines and the Urban Design and Historic Preservation Element.

B. Maintain the existing scale of downtown. New construction should fit into the context of the existing built environment and complement downtown's historic character.

²² Kavanaugh-Lynch, Margaret, City of Berkeley Planning and Development Department, July 1999. *Personal communication* with LSA Associates, Inc.

²³ Ibid.

²⁴ Bruce, Anthony, BAHA, February 1995. *Personal communication* with LSA Associates, Inc.

C. Encourage infill development that is compatible with existing uses and improves the pedestrian environment and the streetscape. Permit taller buildings only if they are in scale with other structures in the downtown.

§ *Policy LU-27.* Maintain the Civic Center as a cohesively designed, well-maintained and secure place for community activities, cultural and educational uses, and essential civic functions and facilities. Promote the Civic Center as a historic resource listed on the National Register of Historic Places.

§ *Policy LU-28.* Maintain and improve Neighborhood Commercial Areas including Elmwood, Solano, and North Shattuck as, pedestrian-friendly, visually attractive areas of human scale and ensure that Neighborhood Commercial areas fully serve neighborhood needs.

Action:

H. Use design review and careful land use decisions to preserve the historic character of Neighborhood Commercial areas.

§ *Policy LU-29.* Maintain and improve Avenue Commercial areas including University, San Pablo, and South Berkeley as pedestrian-friendly, visually attractive areas of human scale and ensure that Avenue areas fully serve neighborhood needs as well as a broader spectrum of needs.

H. Maintain and improve the historic character of Avenue Commercial areas with design review and careful land use decisions.

§ *Policy S-11.* Encourage and support the long-term protection of historic or architecturally significant structures to preserve neighborhood and community character.

Action:

A. Create incentives for owners of historic or architecturally significant structures to undertake mitigation to levels that will minimize the likelihood of demolition and maximize the ability to repair or avoid damage in the event of a natural disaster.

B. Consistent with public safety and acceptable risk determinations, seek all feasible means to avoid demolition of historic or architecturally significant structures following a disaster by pursuing repair, rehabilitation, and preservation of structures, facades or other features.

§ *Policy H-9.* Encourage efforts to maintain and preserve the existing supply of housing in the City. (Housing Element)

§ *Policy H-11.* Take actions necessary and practical to prevent the deterioration of housing units resulting from deferred maintenance. (Housing Element)

- § *Policy EM-6.* Encourage rehabilitation and reuse of buildings whenever feasible in order to reduce waste, conserve resources and energy, and reduce construction costs. (Environmental Management Element)
- § *Policy PD-1.* Use a wide variety of regulatory, incentive, and outreach techniques to suitably protect Berkeley's existing built environment and cultural heritage.
- § *Policy PD-2.* Commit to the identification and protection of significant structures, sites, and areas, and of the character of neighborhoods and districts, staffing and funding commensurate with their importance to Berkeley's economy and quality of life.
- § *Policy PD-3.* Increase the extent of regulatory protection that applies to structures, sites, and areas that are historically or culturally significant.
Action:
 - C. For any public or private project that may adversely affect an archaeological site, consult with the North Central Information Center of the California Historical Resources Information System require site evaluation as may be indicated, and attempt to prevent or mitigate any adverse impacts.
- § *Policy PD-4.* Use regulations to protect the character of neighborhoods and districts, and respect the particular conditions of each area.
- § *Policy PD-5.* Protect the basic historical scale and character of Downtown.
- § *Policy PD-6.* On an ongoing basis, maintain, expand, and update the inventory of historic and cultural resources.
- § *Policy PD-7.* Encourage, and where appropriate require, retention of ornaments and other architecturally interesting features in the course of seismic retrofit and other rehabilitation work.
- § *Policy PD-8.* Encourage adaptive reuse of historically or architecturally interesting buildings in cases where the new use would be compatible with the structure itself and the surrounding area.
- § *Policy PD-9.* Encourage, and where appropriate require, owners of historically or architecturally valuable buildings to incorporate disaster-resistance measures to enable them to be feasibly repaired after a major earthquake or other disaster.
- § *Policy PD-10.* In public works projects, seek to preserve desirable historic elements such as ornamental sidewalk features, lampposts, and benches.
- § *Policy PD-11.* Wherever feasible and appropriate, tree replacement should emphasize maintaining historic planting patterns and species and be consistent with the City of Berkeley 1990 Street Tree Policy.

- \$ *Policy PD-12.* Strongly support actions by the University to maintain and retrofit its historic buildings, and strongly oppose any University projects that would diminish the historic character of the campus.
- \$ *Policy PD-13.* Urge the Berkeley Unified School District to maintain and improve its historic buildings and sites in an architecturally sensitive manner.
- \$ *Policy PD-14.* Seek to maintain and substantially expand the range and scale of incentives, which the City and/or other entities make available in Berkeley for the preservation of historic and cultural resources.
- \$ *Policy PD-15.* Review zoning and other regulations, and incidental procedures, and where appropriate revise them to provide new incentives for preservation and remove or reduce disincentives.
- \$ *Policy PD-16.* Consider potential new funding, tax-reduction, and technical-assistance incentives which the City and/or other entities could provide to facilitate preservation.
- \$ *Policy PD-17.* Continue or establish formal or informal partnerships with other public agencies such as the State Office of Historic Preservation, nonprofit organizations such as BAHA, and the private sector.
- \$ *Policy PD-36.* Promote, and encourage others to promote, understanding of Berkeley's built and cultural heritage, the benefits of conserving it, and how to sensitively do that.
- \$ *Policy PD-37.* Distribute, and encourage others to distribute, information on the incentives available to assist in preservation.
- \$ *Policy PD-38.* As an economic development strategy, promote the city's cultural and architectural heritage.
- \$ *Policy PD-39.* Promote, and encourage others to promote, understanding of how new buildings and alterations should be designed to provide good facilities that respect and enhance their context.

2. **Impacts and Mitigation Measures**

a. Criteria of Significance. The *Draft General Plan* would have a significant effect on cultural resources if it would:

- \$ Cause a substantial adverse change in the significance of a historical resource as defined in the California Code of Regulations ' 15064.5;
- \$ Cause a substantial adverse change in the significance of an archaeological resource pursuant to the California Code of Regulations ' 15064.5;
- \$ Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or

§ Disturb any human remains, including those interred outside of formal cemeteries.

b. Impacts and Mitigation Measures. In this impacts and mitigation analysis, less-than-significant cultural resources impacts are discussed first, followed by significant impacts.

(1 Less-than-Significant Impacts. Implementation of *Policies LU-2, LU-7, LU-24, LU-27, LU-28, H-9, H-11, H-20, EM-6* relate to cultural resources, but would not be expected to result in environmental impacts. *Policies PD-1 through PD-17, and PD-36 through PS-39* would result in beneficial effects on historical and cultural resources by providing for historic resource preservation and protection. The following revisions to *Draft General Plan* policies are suggested to ensure minimization of cultural resource impacts in the City of Berkeley.

Impact CUL-1: The Draft General Plan does not contain adequate policies to minimize potential impacts to buried cultural resources in areas currently known to contain sensitive cultural resources. (PS)

Policy PD-3 Action C requires the consultation with the North Central Information Center of the California Historical Resources Information System for any public or private project that may adversely affect an archaeological site. However, this policy does not define which projects may need consultation. All projects that involve groundbreaking activities could be included in this policy.

Mitigation Measure CUL-1: The City shall establish standard conditions of approval and criteria for determining which discretionary projects are likely to contain significant archaeological materials to warrant further site-specific investigation, or archaeological assessment, intensive surface surveys, and/or subsurface testing as part of the project development process. (LTS)

With the implementation of this suggested mitigation measure, potential impacts to buried cultural resources would be minimized.

Impact CUL-2: The Draft General Plan proposes increased residential development in the Downtown, in association with the University, and along transit corridors which could have the potential to encourage demolition of historic resources located in these neighborhoods. (LTS)

As discussed in the setting section above, the City has implemented a system of historic structure designation and protection. The Landmarks Preservation Commission is a City-Council appointed commission responsible for preventing the unnecessary demolition of historic structures. The Landmarks Preservation Commission has advisory review of demolition permits for non-residential buildings over 40 years in age.

This local system of historic resource preservation would preclude demolition of any historic structure without consideration and review by City staff and appointed Commission members. In addition, *Draft General Plan Policies PD-1 through PD-17 and PD-36 through PD-39* provide for the protection of historic resources in the City. Therefore, increasing development in these commercial/mixed use districts would not in and of itself result in potential impacts to historic resources that would require mitigation.

Mitigation Measure CUL-2: None required. (LTS)

(2) Significant Cultural Resource Impacts and Mitigation Measures.

Implementation of the *Draft General Plan* would not result in any significant impacts to cultural and historic resources. As discussed above, the combination of new development envisioned by the *Draft General Plan* would be counter-balanced by a series of policies whose effect would be the retention and protection of cultural and historic resources as well as the continued reliance upon the City Landmarks Preservation Commission review process.

