

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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March 27, 2015

David Newell
Associate Planner
City of Palm Springs
3200 E. Tahquitz Canyon Way
Palm Springs, California 92262

Dear Mr. Newell,

**RE: ABERDEEN PROJECT INITIAL STUDY MITIGATED NEGATIVE
DECLARATION**

Thank you for including the California Office of Historic Preservation (OHP) in the environmental review process for the proposed Aberdeen Project. Pursuant to the National Historic Preservation Act and the California Public Resources Code, the State Historic Preservation Officer (SHPO) and the OHP have broad responsibility for the implementation of federal and state historic preservation programs in California. We have a history working with the City of Palm Springs (Lead Agency) through our Certified Local Government Program. Our comments are offered with the intent of protecting historic and cultural resources, while allowing the City of Palm Springs to meet its program needs. The following comments are based on the information included in the Initial Study/Mitigated Negative Declaration (IS/MND) for the Aberdeen Project.

The proposed project will construct an 8 acre mixed-use development with 74 residential units, and 17 live-work units, with approximately 1,568-square feet of retail space. The project site is partially occupied by the Tahquitz Plaza office complex, which would be demolished as part of the proposed project. In order to adopt the IS/MND as an adequate environmental document in compliance with CEQA, the decision making body must find that it has adequately addressed environmental impacts. If the document has failed to identify significant environmental impacts, the decision making body should not adopt the findings as adequate.

Pursuant to the city's Municipal Code § 8.05.135, the City's Preservation Board is responsible to "conduct or cause to be conducted such preliminary surveys, studies or investigations as it deems necessary to adequately inform the historic site preservation board and city council prior to public hearing, and shall make available to any interested person the results of any such survey, study or investigation." In keeping with this provision of the municipal code, the City of Palm Springs commissioned a city-wide historic architecture survey. This survey effort is currently ongoing. As part of this survey effort, we understand the Tahquitz Plaza office complex was evaluated and identified as a historical resource. These findings were provided to the Lead Agency as

part of the CEQA comment process in a letter dated February 19, 2015, authored by Alan Hess, a specialist in the field of architectural history.

The discussion of environmental impacts within the IS/MND states that the Tahquitz Plaza office complex is not a historic resource as defined in the CEQA Guidelines § 15064.5 because “[t]he existing buildings are not listed as a state historical resource of significance, nor are the buildings locally listed with the City of Palm Springs.” Yet, CEQA Guidelines § 15064.5 (4) states that “[t]he fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources, or identified in a historical resources survey does not preclude a lead agency from determining the resource may be a historical resource [for the purposes of CEQA]...” There is no mention in the IS/MND of the ongoing city-wide survey, nor any evaluation of eligibility for the Tahquitz Plaza office complex. In light of the preliminary findings of historical significance described in the Alan Hess letter, we encourage the Lead Agency to act within its discretion, provided in § 15064.5(4) of the CEQA Guidelines, to consider the Tahquitz Plaza office complex as a historic resource for the purposes of CEQA. If the Lead Agency is to consider the Tahquitz Plaza office complex a historic resource, it could not reasonably adopt the findings in the IS/MND as being in compliance with CEQA and adequately addressing significant environmental impacts.

If the Lead Agency chooses to exercise its discretion under § 15064.5(4) of the CEQA Guidelines and treat the Tahquitz Plaza office complex as a historic resource, it may be possible to modify the proposed project to avoid impacts to the historical resources. If the project is modified to avoid demolition, impacts to historic resources could be avoided. In this way, the Lead Agency could modify the IS/MND, and avoid the time and cost involved in preparing an Environmental Impact Report (EIR).

If you have questions, please contact Sean de Courcy of the Local Government and Environmental Compliance Unit, at (916) 445-7042 or at Sean.deCourcy@parks.ca.gov.

Sincerely,



Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer

CC:
Palm Springs City Council
Palm Springs Preservation Foundation