## **Chapter 7:**

# **Historic and Cultural Resources**

# A. INTRODUCTION

This chapter considers the potential for the proposed actions to affect architectural and archaeological resources. As described in Chapter 1, "Project Description," under the reasonable worst-case development scenario (RWCDS) the proposed actions would result in the development of approximately five new mixed-use buildings on the proposed development site, as well as, potentially, redevelopment of the projected future development site and the potential development site.

The analysis characterizes existing conditions, evaluates changes to historic and cultural resources that are expected to occur independent of the proposed actions, and identifies and addresses any potential impacts to historic and cultural resources associated with the proposed actions.

#### PRINCIPAL CONCLUSIONS

As described in detail below, the proposed actions would result in a significant adverse impact associated with the demolition of the five one-story retail buildings on the proposed development site. In addition, it is possible that the development on the projected future development site could have a direct significant adverse impact on the S/NR-eligible Lenox Terrace historic resource during construction. If the potential development site were to be redeveloped, that redevelopment also would have the potential to result in similar construction-related impacts. The applicant's proposed actions development would not be anticipated to result in significant adverse impacts to other historic and cultural resources in the study area, with the preparation and implementation of a Construction Protection Plan to avoid inadvertent demolition and/or construction-related damage to resources within 90 feet of the proposed development site.

# **B. METHODOLOGY**

Consistent with the guidance of the 2014 *City Environmental Quality Review (CEQR) Technical Manual*, in order to determine whether the proposed project could potentially affect architectural resources, this attachment considers whether the proposed project would result in a physical change to any resource, a physical change to the setting of any resource (such as context or visual prominence), and, if so, whether the change is likely to alter or eliminate the significant characteristics of the resource that make it important. More specifically, as set forth in the *CEQR Technical Manual*, potential impacts to architectural resources may include the following:

- Physical destruction, demolition, damage, alteration, or neglect of all or part of a historic property;
- Changes to an architectural resource that cause it to become a different visual entity;

#### Lenox Terrace

- Isolation of the property from, or alteration of, its setting or visual relationships with the streetscape, including changes to the resource's visual prominence;
- Introduction of incompatible visual, audible, or atmospheric elements to a resource's setting;
- Replication of aspects of the resource so as to create a false historical appearance;
- Elimination or screening of publicly accessible views of the resource;
- Construction-related impacts, such as falling objects, vibration, dewatering, flooding, subsidence, or collapse; and
- Introduction of significant new shadows, or significant lengthening of the duration of existing shadows, over a historic landscape or on a historic structure (if the features that make the resource significant depend on sunlight) to the extent that the architectural details that distinguish that resource as significant are obscured.

The study area for archaeological resources is defined as the area where subsurface disturbance would occur. In a comment letter dated September 1, 2017, the New York City Landmarks Preservation Commission (LPC) determined that it has no archaeological concerns for the rezoning area (see **Appendix B**). Therefore, this chapter focuses on standing structures only.

To evaluate potential effects due to on-site construction activities, and also to account for visual or contextual impacts, the study area for architectural resources is defined as extending 400 feet from the rezoning area (see **Figure 7-1**). As defined in the New York City Department of Building's (DOB) *Technical Policy and Procedure Notice (TPPN)* #10/88, adjacent construction is defined as any construction activity that would occur within 90 feet of an architectural resource.<sup>1</sup> Consistent with the guidance of the *CEQR Technical Manual*, designated architectural resources that were analyzed include: New York City Landmarks (NYCL), Interior Landmarks, Scenic Landmarks, New York City Historic Districts (NYCHD); resources calendared for consideration as one of the above by LPC; resources listed on or formally determined eligible for inclusion on the State and National Registers of Historic Places (S/NR), or contained within a district listed on or formally determined eligible for listing on the Registers; resources recommended by the New York State Board for listing on the Registers; and National Historic Landmarks (NHL). In addition, a survey was conducted to identify any previously undesignated properties that appear to meet S/NR or NYCL eligibility criteria ("potential architectural resources").

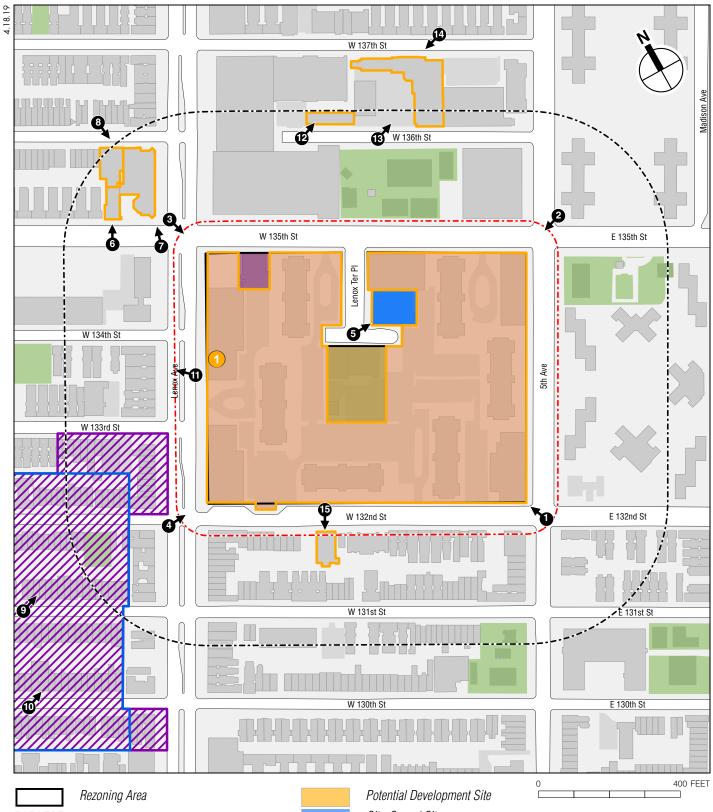
# **C. EXISTING CONDITIONS**

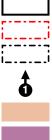
#### **REZONING AREA**

#### PROPOSED DEVELOPMENT SITE

In a comment letter dated September 1, 2017, LPC determined that the Lenox Terrace complex on the proposed development site appears eligible for listing on the S/NR, for its cultural associations with prominent African Americans in the Harlem community (see **Appendix B**). The Lenox Terrace complex comprises six 16-story residential towers and five one-story retail

<sup>&</sup>lt;sup>1</sup> TPPN #10/88 was issued by DOB on June 6, 1988, to supplement Building Code regulations with regard to historic structures. TPPN #10/88 outlines procedures for the avoidance of damage to historic structures resulting from adjacent construction, defined as construction within a lateral distance of 90 feet from the historic resource.





90-foot boundary

400-foot boundary

Photograph View Direction and Reference No.

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City-Owned Site

Known and Potential Architectural Resources

Central Harlem West 130th-132nd Streets Historic District (NYCL) Lafayette Theatre Area Historic District (S/NR-eligible)

Proposed Development Site

Projected Future Development Site

Architectural Resources Reference Map Figure 7-1

LENOX TERRACE

buildings on Lenox and Fifth Avenues and 135th Street (see Views 1-4 of **Figures 7-2 and 7-3**). Two parcels of land at the northwest and southwest corners of the proposed development site are currently vacant and surrounded with chain-link fencing. The remainder of the site is occupied by surface parking lots and landscaping. The complex was among the first of the projects developed under Title I of the Housing Act of 1949. The residential buildings were constructed 1958-1960 with the retail buildings following, with the exception of one retail building which was constructed in 1957. S.J. Kessler & Sons were the architects; the firm also designed the Washington Square Village and Lincoln Towers developments in Manhattan. Residents have included former Congressman Charles B. Rangel, author Alex Haley, former Manhattan Borough President Percy E. Sutton, former New York State Secretary Basil A. Paterson, former New York State Governor David Patterson, and musician Charles Mingus Jr.

#### PROJECTED FUTURE DEVELOPMENT SITE

The projected future development site (Block 1730, Lot 65) has been occupied since the 1960s by the Metropolitan African Methodist Episcopal (AME) Church, in the former Lincoln Theater, which was constructed circa 1915. In its September 1, 2017 comment letter, LPC determined that the Metropolitan African Methodist Episcopal Church does not appear to be NR or LPC eligible due to its alterations.

## POTENTIAL DEVELOPMENT SITE

Block 1730, Lots 16 and 19 are located within the rezoning area but outside of the proposed development site. They are occupied by the Joseph P. Kennedy Memorial Community Center. This site includes a 3-story brick building facing Lenox Terrace Place as well as two narrow 3-buildings at the rear of the lot. The buildings on the Kennedy Center site have not been identified as potential architectural resources. In a comment letter dated October 19, 2018, LPC concurred with the determination of no significance for the buildings on this site (see **Appendix B**).

#### CITY-OWNED SITE

Block 1730, Lot 55 is located within the rezoning area but outside of the proposed development site. Lot 55 is occupied by the Hansborough Recreation Center and owned by the New York City Department of Parks and Recreation (NYC Parks). The recreation center includes a 3-story brick building with a copper cornice built circa 1924, and a 1-level red brick structure housing a natatorium (indoor swimming pool) built circa 1931 (according to Sanborn maps) (see View 5 of Figure 7-4). The natatorium building has a stone bas relief sculpture above the main entrance. As described on the NYC Parks website, the recreation center opened as the 134th Street Bathhouse in 1925 and was one of many bathhouses built early in the century to promote public health, hygiene, and recreation. The natatorium was decorated with tiles, mosaics, and ceramic panels depicting various sea creatures. The 3-story building also includes a gymnasium and running track. In 1934, the facility was turned over to the Department of Parks to serve as a recreation center and in 1984, it was named in memory of John Rozier Hansborough Jr, a former Parks employee and Harlem community leader. The natatorium was identified in the 2012 Comprehensive Historic Preservation Plan prepared by Manhattan Community Board 10 as a potential interior landmark. For the purposes of this analysis, it considered as a potential architectural resource.



Lenox Terrace complex, view from 132nd Street and Fifth Avenue



Lenox Terrace complex, view from 135th Street and Fifth Avenue



Lenox Terrace complex, view from 135th Street and Lenox Avenue 3



Lenox Terrace complex, view from 132nd Street and Lenox Avenue 4

#### STUDY AREA

There are six known architectural resources located within the study area. These resources are described below and mapped on **Figure 7-1**. Four potential architectural resources were identified within the study area.

#### KNOWN ARCHITECTURAL RESOURCES

#### Schomburg Center for Research in Black Culture

The Schomburg Center is a National Historic Landmark (NHL), is listed on the S/NR, and is a New York City Landmark. The NHL and S/NR complex includes three connected buildings: the former West 135th Street branch library, described below (now referred to as the Landmark Building); the Schomburg Building, a 5-story red brick and glass structure on Lenox Avenue, which was built in 1980 and designed by the firm Bond, Ryder and Associates; and the Langston Hughes Building, a 1991 expansion designed by Davis Brody Bond that fits between the two older structures (see Views 6 and 7 of **Figures 7-4 and 7-5**). The NYCL designation comprises the former West 135th Street branch library portion of the complex. This building was designed by McKim, Mead & White and is one of eleven buildings that the firm designed for the New York Public Library system under a grant from Andrew Carnegie. The three-story limestone and brick building has a rusticated ground floor, a central Palladian window, two-story pilasters, and a modillioned overhanging copper cornice. In 2015-2017, the Schomburg Center was renovated by Marble Fairbanks Architects. The project included a complete renovation of the Landmark Building, construction of a two-story annex, building system upgrades, and replacement of roofs on both the Landmark and Langston Hughes' Buildings.

#### Countee Cullen Library

The Countee Cullen branch library of the New York Public Library at 104 West 136th Street has been determined S/NR-eligible under Criterion C in the area of public architecture as a locally significant example of mid-20th century Modern design, and under Criterion A in the areas of social history and education for its association with Harlem and the history of the New York Public Library system. LPC has determined that the building is not eligible for NYCL designation.<sup>2</sup> The building is located at 104 West 136th Street, adjacent to the Schomburg Center (see View 8 of **Figure 7-5**). The Countee Cullen Branch originally opened in 1905 as the 135th Street Branch in a building designed by McKim, Mead and White with funds given by Andrew Carnegie; the original building is now part of the New York Public Library's Schomburg Center for Research in Black Culture, see above. In 1941, having outgrown its quarters, the library moved to a new building at its present location, designed by Louis Allen Abramson.

# Central Harlem-West 130th-132nd Streets Historic District / Lafayette Theatre Area Historic District

LPC recently designated the Central Harlem-West 130th-132nd Streets Historic District, which is generally bounded by Lenox and Seventh Avenues and West 130th and 132nd Streets. The buildings within the district, primarily row houses with some apartment and institutional buildings, were generally constructed during the speculative building boom that created Central Harlem's row house neighborhoods in the late 19th century. The resulting streetscapes contain a

<sup>&</sup>lt;sup>2</sup> LPC comment letter dated September 7, 2018 (see Appendix C).



Hansborough Recreation Center, view from Lenox Terrace Place 5



Schomburg Center for Research in Black Culture, view from 135th Street 6



Schomburg Center for Research in Black Culture **7** view from Lenox Avenue and 135th Street



Countee Cullen Library, view from 136th Street 8

notably cohesive and intact collection of late-19th century row house architectural styles, including neo-Grec, Queen Anne, Renaissance Revival, and Romanesque Revival style buildings (see Views 9 and 10 of **Figure 7-6**). The historic district was determined eligible for listing on the S/NR as the Lafayette Theater Area Historic District; the S/NR eligibility determination includes additional properties on West 133rd, West 130th, and Lenox Avenues (see **Figure 7-1** and View 11 of **Figure 7-7**). The Lafayette Theater, which played an important part in the entertainment history of Harlem and was located at the center of the historic district, was demolished in 2013.

#### Harlem Hospital Center

Two buildings on the campus of the Harlem Hospital Center—the Old Nurses Residence and the Women's Pavilion—have been determined eligible for listing on the S/NR. LPC has determined that the buildings are not eligible for NYCL designation.<sup>3</sup>

The Old Nurses Residence is a 5-story red brick institutional building erected in 1915 (see View 12 of **Figure 7-7**). It is the oldest surviving building on the hospital campus. It originally served as a dormitory building and included lounges, a library with access to the western porch, and a classroom. Together with the New Nurses Residence (no longer extant) and the Women's Pavilion, it was determined eligible for the S/NR under Criterion A in the areas of social, ethnic, and helath care history for its contributions to the Harlem community in the 20th century. The buildings also were determined eligible under Criterion C in the area of architecture as representative examples of early 20th century institutional design with Renaissance inspired features. The buildings share many of the same features, including brick walls with contrasting terra cotta or cast concrete trim at windows, doors, beltcourses, and cornices; use of decorative brick rustication; symmetrical fenestration; and accentuated main entrances.

The Women's Pavilion was built in 1932 in conjunction with the New Nurses Residence (no longer extant) and the District Health Center building (see below) of the Harlem Hospital complex. It was designed by Sloan & Robertson, architects for the City's Department of Hospitals. The building fronts on 137th Street and has an irregular footprint; a narrow L-shaped rear wing extends the width of the block to front on 136th Street, and several lower sections that appear to be later additions project from the rear and sides of the main block and wing (see Views 13 and 14 of Figure 7-8). It has symmetrical fenestration, decorative brick work and contrasting masonry window, door and trim treatments. The main T-shaped block of the building is seven stories tall, with a 9-story L-shaped section set back from the front façade line. A three-sided bay projecting from the rear of the building extends two stories above the roof as an octagonal tower. The Women's Pavilion once included Works Progress Administration-commissioned murals by Charles Alston and Alfred Crimi; these were restored and incorporated into the design of the Hospital's Mural Pavilion, built in 2012 on Lenox Avenue.

## POTENTIAL ARCHITECTURAL RESOURCES

The Bethel AME Church at 54 West 132nd Street is located on the south side of West 132nd Street between Lenox and Fifth Avenues. The Bethel congregation moved to the West 132nd Street site from earlier locations downtown (on Second Street, Sullivan Street, and later 25th Street). Renovations to the church building include new pews and chandeliers in the sanctuary, in the 1960s and 1980s, respectively. The church has a central, segmental arched stained glass

<sup>&</sup>lt;sup>3</sup> LPC comment letter dated September 7, 2018 (see Appendix C).



Central Harlem-West 130th-132nd Streets Historic District, view from 131st Street west of Lenox Avenue



Central Harlem-West 130th-132nd Streets Historic District, view from 130th Street west of Lenox Avenue



Lafayette Theatre Area Historic District, view from Lenox Avenue near 133rd Street 11



Harlem Hospital Center, Old Nurses Residence, view from 136th Street 12



Harlem Hospital Center, Women's Pavilion, view from 136th Street 13



Harlem Hospital Center, Women's Pavilion, view from 137th Street 14

window on its rock-face 132nd Street façade, above three Gothic arched entrances (see View 15 of **Figure 7-9**). The side facades of the building have narrow, Gothic arched stained glass windows. In a comment letter dated September 7, 2018, LPC determined that the church appears to be S/NR eligible.

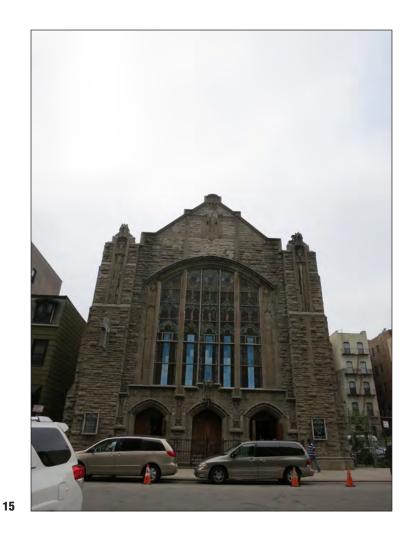
# **D. FUTURE WITHOUT THE PROPOSED PROJECT**

As detailed in Chapter 1, "Project Description," in the absence of the proposed actions the rezoning area is assumed to remain in the same condition as the existing condition.

Three development projects are expected to be completed within the 400-foot study area by the 2026 analysis year. At 416 Lenox Avenue and 10 West 132nd Street, the sites are to be redeveloped with 12- and 10-unit residential buildings, respectively. Directly north of the proposed development site and rezoning area, the Harlem Hospital Center is planning to construct a new 230,000 square foot public health lab. It is possible that the Harlem Hospital Center project could involve the demolition of the Old Nurses Residence and Women's Pavilion buildings on that campus, or could involve construction within 90 feet of these resources, and thus could have the potential to directly (i.e., physically) affect architectural resources. Architectural resources that are located within 90 feet of construction for an as-of-right development are offered some protection through DOB controls governing the protection of adjacent properties from construction activities. The other two projects are not located within 90 feet of architectural resources, and thus are not expected to have the potential to directly affect historic resources during construction activities.

Provisions of the 2014 New York City Building Code provide protection measures for all properties against accidental damage from adjacent construction by requiring that all buildings, lots, and service facilities adjacent to foundation and earthwork areas be protected and supported. Further, Building Code Chapter 3309.4.4 requires that "historic structures that are contiguous to or within a lateral distance of 90 feet ... from the edge of the lot where an excavation is occurring" be monitored during the course of excavation work. (Historic structures are defined as NYCLs, properties within New York City Historic Districts, and S/NR-listed and eligible properties.) TPPN #10/88 supplements the building protections afforded by the Building Code by requiring a monitoring program to reduce the likelihood of construction damage to adjacent NYCLs and S/NR-listed properties (within 90 feet) and to detect at an early stage the beginnings of damage so that construction procedures can be changed.

In the future without the proposed actions, the condition of architectural resources within the study areas could change. Architectural resources that are listed on the National Register or that have been found eligible for listing are given a measure of protection from the effects of federally sponsored or assisted projects under Section 106 of the National Historic Preservation Act. Although preservation is not mandated, federal agencies must attempt to avoid adverse impacts on such resources through a notice, review, and consultation process. Properties listed on the State Register are similarly protected against impacts resulting from state-sponsored or state-assisted projects under the State Historic Preservation Act. Private property owners using private funds can, however, alter or demolish their properties without such a review process. Privately owned sites that are NYCLs or within New York City Historic Districts are protected under the New York City Landmarks Law, which requires LPC review and approval before any alteration or demolition can occur.



Bethel AME Church, view from 132nd Street

# E. FUTURE WITH THE PROPOSED PROJECT

#### **REZONING AREA**

#### PROPOSED DEVELOPMENT SITE

The proposed actions would result in additional development within the existing Lenox Terrace complex. The proposed actions would provide for five new mixed-use buildings on the perimeter of the proposed development site, replacing existing single-story retail structures. The new buildings would include approximately 1,642 new DUs, approximately 135,500 gsf of commercial space, and approximately 15,055 gsf of community facility space. Two of the proposed new buildings (Proposed Buildings NW and SW) would front onto Lenox Avenue; one would front onto West 135th Street (Proposed Building N); and two would front onto Fifth Avenue (Proposed Buildings NE and SE). The buildings would all be 28 stories tall (approximately 284 feet, including mechanical bulkhead). The two new buildings NW and SW) would be connected by a six story (approximately 68-foot-tall) base. The areas at the center of the proposed development site that are currently surface parking would become new open space, and the areas in-between the surface parking to remain are expected to be landscaped with new trees interlaced with existing mature specimen trees. New pedestrian pathways are envisioned between low walls, creating paths between buildings.

The proposed project would entail the demolition of five one-story retail structures on the proposed development site. These buildings are not known to have had any tenants that contribute to the Lenox Terrace complex's cultural associations with prominent African Americans in the Harlem community and do not physically connect to any of the residential buildings that housed prominent community members. However, they were constructed as part of the overall development of the Lenox Terrace complex and are part of the S/NR eligibility determination by LPC. Therefore, the demolition of the one-story structures on the proposed development site would result in a significant adverse impact to historic resources.

The Lenox Terrace complex has not been identified as a historic resource with sunlight-sensitive features. Therefore, the proposed actions would not result in the introduction of significant new shadows, or significant lengthening of the duration of existing shadows, over a historic structure with sunlight-sensitive features, to the extent that the architectural details that distinguish that resource as significant are obscured.

To avoid inadvertent demolition and/or construction-related damage from ground-borne construction period vibrations, falling debris, collapse, etc., the buildings to be retained on the proposed development site would be included in a Construction Protection Plan (CPP) for historic structures that would be prepared in coordination with LPC and implemented in consultation with a licensed professional engineer. The CPP would be prepared as set forth in Section 5223 of the *CEQR Technical Manual* and in compliance with the procedures included in the DOB's TPPN #10/88 and LPC's *Guidelines for Construction Adjacent to a Historic Landmark* and *Protection Programs for Landmark Buildings*. The CPP would be prepared and implemented prior to demolition and construction activities on the proposed development site, and project-related demolition and construction activities would be monitored as specified in the CPP.

The proposed actions would not result in any changes to the buildings to be retained on the Lenox Terrace campus that would cause them to be a different visual entity, such as a new

location, design, materials, or architectural features, or replication of aspects of the resource so as to create a false historical appearance. The existing buildings to be retained on the Lenox Terrace campus would not be altered.

#### **PROJECTED FUTURE DEVELOPMENT SITE**

For the purposes of a conservative analysis, this EIS considers the potential future development of Lot 65 with a mixed-use building (continuation of existing community facility use with residential above), fully utilizing the maximum FAR allowable under the proposed rezoning.

As described above, LPC has determined that the Metropolitan African Methodist Episcopal Church does not appear to be NR or LPC eligible due to its alterations. Therefore, the proposed actions would not result in any significant adverse direct or indirect impacts to architectural resources on the projected future development site. <u>Construction on the projected future development site in the With Action condition would occur within 90 feet of the existing Lenox Terrace building at 40 West 135th Street. (It is assumed in this scenario that the retail building at 480 Lenox Avenue within 90 feet of the projected future development site would already be demolished for the proposed project.) DOB controls governing the protection of adjacent properties from construction activities, including Building Code Chapter 3309.4.4 as discussed above, would offer some protection to this resource; however, the protections to avoid construction-related damage to historic structures under *TPPN #10/88* would not be required as the Lenox Terrace complex is not a NYCL and is not listed on the S/NR. Therefore, should these standard DOB controls not provide sufficient protection, it is possible that development on the projected future development site could have a direct significant adverse impact on the S/NR-eligible Lenox Terrace historic resource during construction.</u>

#### POTENTIAL DEVELOPMENT SITE

For the purposes of a conservative analysis, this EIS considers the potential future development of Lots 16 and 19 under the proposed rezoning. As described above, the buildings on the Kennedy Center site have not been identified as potential architectural resources, and LPC has concurred with the determination of no significance. Therefore, the proposed actions would not result in any significant adverse direct or indirect impacts to architectural resources on the potential development site. <u>Construction on the potential development site in the With Action condition also would occur within 90 feet of the existing Lenox Terrace building at 40 West 135th Street. Therefore, should standard DOB controls not provide sufficient protection, it is possible that development on the potential development site could have a direct significant adverse impact on the S/NR-eligible Lenox Terrace historic resource during construction.</u>

#### **CITY-OWNED SITE**

Redevelopment of the city-owned lot (Lot 55) in the remainder of the rezoning area is not anticipated to occur as a result of the proposed actions.

The Hansborough Recreation Center's natatorium on Lot 55 has been identified as a potential architectural resource. This structure is located within 90 feet of the proposed development site. Therefore, to avoid inadvertent demolition and/or construction-related damage to this resource, from ground-borne construction period vibrations, falling debris, collapse, etc., it would be included in the project's CPP for historic structures that would be prepared in coordination with LPC.

There would be no physical alterations to this resource in the future with the proposed actions. The proposed actions would not result in the isolation of the resource from its setting or visual relationship with the streetscape, or otherwise adversely alter its setting or visual prominence.

#### **STUDY AREA**

#### DIRECT IMPACTS

Using the *CEQR Technical Manual* direct impact criteria noted above, the proposed, projected, and potential development within the rezoning area would not result in the replication of aspects of any of the architectural resources in the study area so as to cause a false historical appearance, or the introduction of significant new shadows or significant lengthening of the duration of existing shadows over historic landscapes or structures. There would be no physical changes to any of the architectural resources identified above.

The Bethel AME Church is located within 90 feet of the proposed development site (see **Figure 7-1**). Therefore, to avoid inadvertent demolition and/or construction-related damage to this resources from ground-borne construction period vibrations, falling debris, collapse, etc., it would be included in the project's CPP for historic structures that would be prepared in coordination with LPC.

#### INDIRECT IMPACTS

The proposed actions would not result in the isolation of any architectural resource from its setting or visual relationship with the streetscape, or otherwise adversely alter a historic property's setting or visual prominence. At 28 stories tall (approximately 284 feet, including mechanical bulkhead), the proposed buildings on the proposed development site would be the same height as the mechanical bulkhead at Harlem Hospital Center on the north side of West 135th Street; the visual context of the architectural resources in the study area also includes 13-to 17-story buildings. The six-story base connecting the two new buildings at the northwest and southwest corners of the proposed development site (Proposed Buildings NW and SW) would be approximately the same height as the four- to six-story residential buildings on the west side of Lenox Avenue, making for a contextual development in this location.

The proposed, projected, and potential development within the rezoning area would not introduce incompatible visual, audible, or atmospheric elements to a resource's setting. The residential, retail, and community facility uses of the proposed and projected development are comparable with the use of many of the historic and modern buildings in the study area. The proposed actions would not result in the elimination or screening of significant publicly accessible views of any architectural resources in the study area. The proposed actions also would not result in the introduction of significant new shadows, or significant lengthening of the duration of existing shadows, on historic structures with sunlight-sensitive features, to the extent that the architectural details that distinguish that resource as significant are obscured.

In summary, the proposed actions would not be anticipated to have any significant adverse impacts on historic and cultural resources in the study area, with the preparation and implementation of the CPP. \*