

4.9 CULTURAL/SCIENTIFIC RESOURCES

An Historic Resource Assessment of the Fred C. Nelles Youth Correction Facility was undertaken by Chattel Architecture Planning & Preservation in order to evaluate the potential impacts associated with redevelopment activities that may occur pursuant to the First Amendment to the Whittier Commercial Corridor Redevelopment Project. The Historic Resource Assessment, the results of which are presented in this section of the Draft EIR, is included as Appendix C.

4.9.1 Existing Conditions

Historic Resources

During the 1970s, three studies were prepared documenting historic resources in the City of Whittier. The first, a publication of the Whittier Historical Society and Rio Hondo College in 1977 entitled, "Founders and Friends" provides a listing and description of 59 sites in the City that were determined to be of "historical interest." A second study was conducted in 1977 by the Los Angeles County Museum of Natural History, which included a formal inventory, using standardized inventory forms and assigning a classification to each building surveyed, including eligibility for listing on the National Register. This inventory identified 49 potential historic buildings in the City. The final survey was conducted in 1978 and included a study of the Uptown Whittier area in conjunction with the creation of the Whittier Uptown Village. "Buildings of architectural distinction" and "background buildings" were identified on a map that was prepared and included in a report that concludes the buildings "contribute to the identifiable character of the built environment . . ." It is important to note that many other historical and cultural sites exist throughout the City.

According to the Historic Resources Commission and the Whittier Historical Society, there are a number of sites and structures of historic significance in the City. Some have already been preserved, others have been recognized and identified by signs or plaques as landmarks, and others are in need of attention and preservation. However, only one of these features, the Fred C. Nelles School (i.e., Subarea B) is located within the Added Area.

In 1994, the Nelles property and several individual buildings were evaluated for historic significance. However, no substantial history was prepared as part of previous evaluations, nor did the survey address all buildings and landscapes on the site. No boundaries were established at the time of that survey. The results of this evaluation are presented in Table 4.9-1.

Table 4.9-1

**Fred C. Nelles School Historic Evaluation
 Whittier Commercial Corridor Redevelopment Project**

Property	National Register Eligibility	California Register Eligibility	Notes
Fred C. Nelles School (entire campus)	YES as a district	LISTED (but no boundaries identified)	California Historical Landmark No. 947
Administration Building	YES as district contributor and individual building	LISTED individually	Constructed 1929
Superintendent's Residence	YES as district contributor and individual building	LISTED individually	Constructed 1920
Personnel Building	YES as district contributor and individual building	LISTED individually	Constructed 1915, demolished 1996
Maintenance Garage	YES as district contributor and individual building	LISTED individually	Constructed 1931
Chapel	YES as district contributor and individual building	LISTED individually	Constructed 1933, also known as Chapels and Commissary

Property	National Register Eligibility	California Register Eligibility	Notes
Gymnasium	YES as district contributor and individual building	LISTED individually	Constructed 1934
Infirmary	YES as district contributor and individual building	LISTED individually	Constructed 1929
Auditorium	YES as district contributor and individual building	LISTED individually	Constructed 1923
Assistant Superintendent's Residence	YES as district contributor and individual building	LISTED individually	Constructed 1926
SOURCE: Chattel Architecture Planning & Preservation; March 9, 2005.			

Historic Resources Criteria

National Register of Historic Places (National Register)

The National Register of Historic Places (National Register) is the official federal list of districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, and culture. In order to be considered for listing in the National Register, a (historic) resource must meet any one (or more) of the four criteria identified below:

- A. Associated with events that have made a significant contribution to the broad patterns of our history;
- B. Associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a 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 and distinguishable entity whose components may lack individual distinction;
- D. Have yielded, or may be likely to yield, information important in prehistory or history.

The Historic Assessment prepared for the Nelles property, concluded that based upon its history and integrity, the Fred C. Nelles Youth Correctional Facility appears to be eligible for listing as an historic district in the National Register under criteria A (i.e., associated with events that have made a significant contribution to the broad patterns of our history), B (i.e., associated with the lives of persons significant in our past), and C (i.e., embody the distinctive characteristics of a 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 and distinguishable entity whose components may lack individual distinction), with the most important period of significance lasting from 1912 to 1941. There are a number of contributing and non-contributing buildings on the campus. In addition, the campus appears to be potentially eligible under criteria D (i.e., have yielded, or may be likely to yield, information in prehistory or history).

California Register of Historical Resources (California Register)

The California Register was established to serve as an authoritative guide to the state's significant historical and archaeological resources. In order to be included on the California Register, a property must be found by the State Historical Resources Commission to be significant under any of the following criteria (which parallel National Register criteria):

- 1 Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- 2 Is associated with the lives of persons important in our past.

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history

Based on the findings presented in the Historic Assessment (refer to Appendix C), it appears that the Nelles property retains integrity necessary to maintain its listing in the California Register as California Historic Landmark No. 947, in addition to remaining eligible for listing in the National Register as an historic district.

The historic district identified as the Nelles property contains a number of buildings constructed during the period of significance that retain adequate historic fabric and integrity. The buildings identified below are considered contributing resources to the potential National Register historic district and are, thus, all eligible for listing under criterion A, for their association with the first juvenile reform school in California (i.e., Whittier State School) and the school's advanced behavioral modification techniques from 1912 to 1941. In addition, many of the buildings appear individually eligible for listing in the National and California Registers for their association with the Whittier State School, association with Fred C. Nelles, or for their architectural significance:

- Superintendent's Residence (1920)
- Auditorium (1923)
- Assistant Superintendent's Residence (1926)
- Administration Building (1929)
- Infirmary (1929)
- Maintenance Garage (1931)
- Chapel (1933)
- Gymnasium (1934)

In addition to the buildings identified above, a number of landscape features on the subject property, several of which are functionally-related to contributing buildings, which appear to retain integrity from the period of significance, have been identified as contributing resources to the historic district, including:

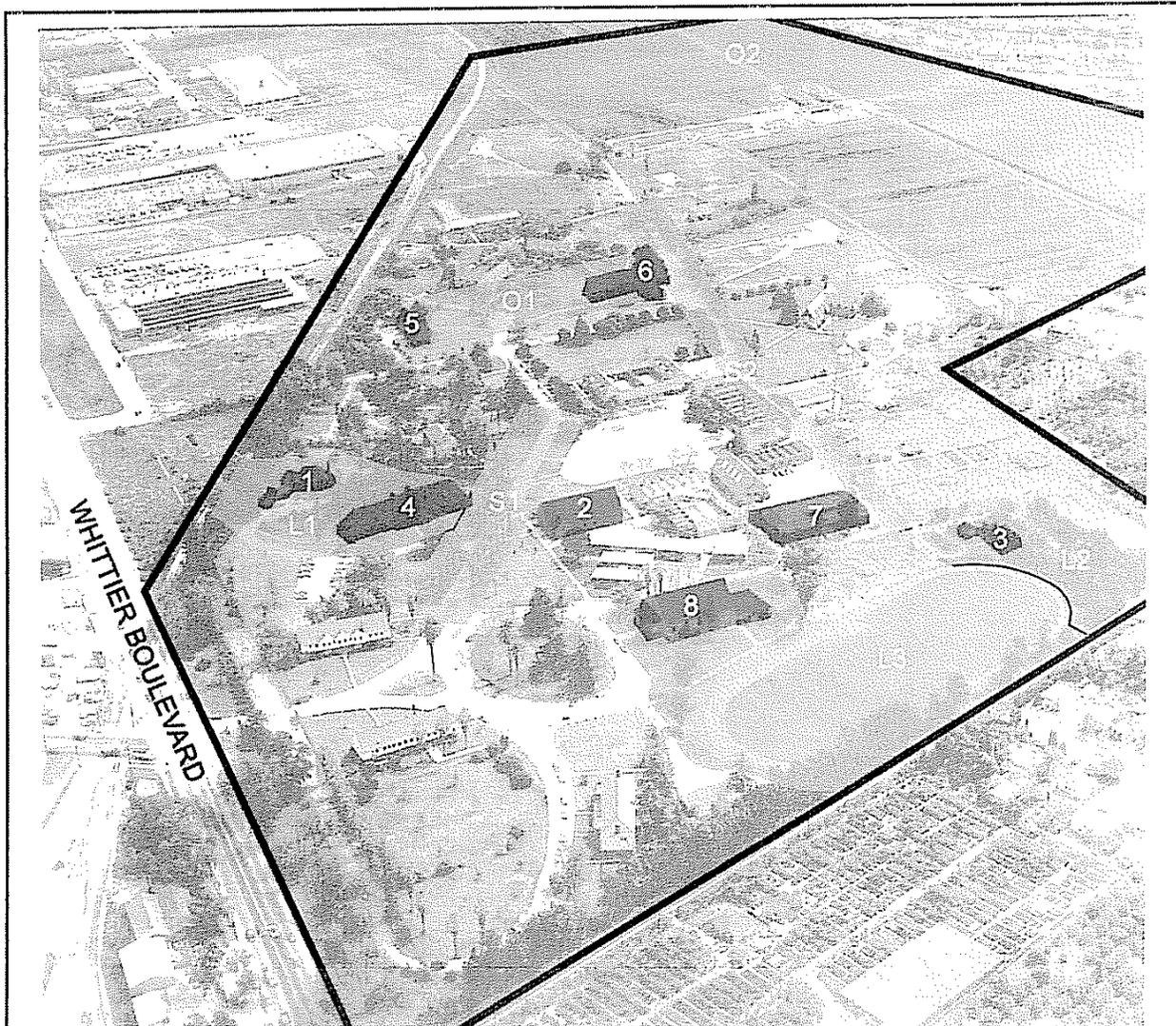
- Landscaping surrounding Superintendent's Residence and Administration Building
- Landscaping around Assistant Superintendent's Residence
- Landscaping around Gymnasium, including Athletic Field
- Streetscape 1 (angled street that runs from the entrance south between the Administration Building and Auditorium)
- Streetscape 2 (street that runs from the Maintenance Garage southeast past the Chapel Building)
- Open Space 1 (space between the Infirmary and Chapel Building)
- Open Space 2 (area around the southern and western boundaries of the campus)

The historic resource assessment updates and confirms the listing of the Fred C. Nelles Youth Correction Facility, formerly known as the Whittier State School, as an historic landmark in the California Register under criteria 1 through 3 previously identified and potentially eligible (with additional research) under criterion 4. In addition, the site appears to be eligible for listing as an historic district in the National Register under criteria A, B, and C previously identified and potentially eligible (with additional research) under Criterion D. The boundaries of the historic landmark encompass the entire property. Table 4.9-2 reflects the findings of the Historic Assessment prepared for the subject property. These features are illustrated on Exhibit 4.9-1.

Table 4.9-2

Historic Assessment Findings – Fred C. Nelles Youth Correction Facility
 Whittier Commercial Corridor Redevelopment Project

Property	National Register Eligibility	California Register Eligibility	Applicable National Register Criteria
Fred C Nelles School (entire campus)	YES as district, with boundaries as described in the historic assessment	LISTED, with boundaries as described in historic assessment	A, B, C, D
Administration Building	YES, as district contributor and individual building	LISTED individually and as district contributor	A, B, C
Superintendent's Residence	YES, as district contributor and individual building	LISTED individually and as district contributor	A, B, C
Maintenance Garage	YES, as district contributor and individual building	LISTED individually and as district contributor	A
Chapel	YES, as district contributor and individual building	LISTED individually and as district contributor	A, C
Gymnasium	YES, as district contributor and individual building	LISTED individually and as district contributor	A, C
Infirmary	YES, as district contributor and individual building	LISTED individually and as district contributor	A, C
Auditorium	YES, as district contributor and individual building	LISTED individually and as district contributor	A, C
Assistant Superintendent's Residence	YES, as district contributor and individual building	LISTED individually and as district contributor	A
Landscape L1	NO; potential district contributor	NOT LISTED; potential district contributor	A, C (functionally related to Superintendent's Residence and Administration Building)
Landscape L2	NO: potential district contributor	NOT LISTED; potential district contributor	A, C (functionally related to Assistant Superintendent's Residence)
Landscape L3	NO; potential district contributor	NOT LISTED: potential district contributor	A, C (functionally related to Gymnasium)
Streetscape S1	NO: potential district contributor	NOT LISTED; potential district contributor	A
Streetscape S2	NO potential district contributor	NOT LISTED; potential district contributor	A
Open Space OS1	NO potential district contributor	NOT LISTED; potential district contributor	A (view area between old Infirmary and Chapel Building)
Open Space OS2	NO: potential district contributor for archaeology	NOT LISTED; potential district contributor for archaeology	D
SOURCE: Chattel Architecture Planning & Preservation; March 9, 2005.			



- 1. Superintendent's Residence (1920)
- 2. Auditorium (1923)
- 3. Assistant Superintendent's Residence (1926)
- 4. Administration Building (1929)
- 5. Infirmary (1929)
- 6. Chapels (1933)
- 7. Maintenance Garage (1931)
- 8. Gymnasium (1934)

- L1. Landscaping around Superintendent's Residence and Administration Building
- L2. Landscaping around Assistant Superintendent's Residence
- L3. Landscaping around Gymnasium including athletic field
- S1. Streetscape from entrance area south between Administration Building and Auditorium
- S2. Streetscape from Maintenance Garage southeast to Chapels
- O1. View area between Infirmary and Chapels
- O2. View area around southern portion of property (historically farmland)

SOURCE: Chattel Planning & Architecture

Exhibit 4.9-1
Subarea B - Site Features

Archaeological Resources

Prior records searches conducted through the UCLA Archaeological Center revealed the presence of known historic and archaeological resources in Whittier, including one near the intersection of Whittier Boulevard and the San Gabriel River Freeway (I-605), which is believed to be the site of an historic Gabrieliño Village. Based on subsequent archaeological surveys conducted in the City, the hillside areas of the City and the area surrounding the previously recorded Gabrieliño Village site have the greatest potential for yielding significant archaeological resources. Subareas A and C, located along Lambert Road, are completely developed. However, Subarea B, the site of the Fred C. Nelles Youth Correctional Facility, contains an area that has not been developed. Although most of the open space on that site has diminished over the years through construction of new facilities, the entire site has information potential and the Open Space 2 (refer to Exhibit 4.9-1), in particular, remains the largest undeveloped open space on the campus. Since this area has never been developed, it is possible that this land could provide important archaeological information related to the historic significance of the school and its wards, particularly during the facility's period of significance (i.e., 1912 to 1941) when the area was used for farming and raising livestock.

Paleontological Resources

Sedimentary rock formations in the City, including the Miocene Monterey and Repetto Formations, Late Pliocene Fernando Formation, the Pleistocene Palos Verdes San and other Quaternary sediments, have been known to produce fossils. These formations are largely located within the Puente Hills. With the exception of portions of Subarea B, the proposed Added Area is nearly built out and, as a result, it is likely that any fossils that may have existed were destroyed when development occurred.

4.9.2 Significance Criteria

Potential project-related impacts to cultural resources are considered to be significant if the following occurs:

- Cause a substantial adverse change in the significance of an historic resource as defined in CEQA § 15064.5.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA § 15064.5.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

4.9.3 Standard Conditions

Future development and/or redevelopment within proposed Project Area will be subject to all applicable goals and strategies of the Whittier General Plan, Whittier Boulevard Specific Plan, and related applicable long-range plans pertaining to the mitigation of potential historic, archaeological, and/or paleontological resources.

4.9.4 Potential Impacts

Short-Term (Construction) Impacts

Any potential construction-related impacts to cultural resources would occur at the time development and/or redevelopment is proposed within the Added Area. Construction impacts are those impacts that would occur as a result of grading and construction activities (e.g., impacts associated with staging areas, earth material borrow areas, etc.) related to the implementation of a specific project. Without specific information as to the nature and extent of such future projects, construction impacts cannot be easily

defined. However, because the Added Area is virtually entirely developed (with the exception of portions of Subarea B), it is unlikely that construction-related impacts to cultural resources would occur.

Long-Term (Operational) Impacts

Historic Resources

Based on 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 Rehabilitation Standards and Guidelines* (36 CFR part 68), the potential impacts identified below will not occur.

- Relocation of an historical resource from its historic location in a manner that is not consistent with the *Secretary's Rehabilitation Standards and Guidelines* (36 CFR 68) or technical advisories, specifically *Moving Historic Buildings*.

No Historical resources are currently proposed to be relocated. Therefore, this criterion is not applicable to the proposed project and there no significant impact will occur.

- Neglect of an historical resource, which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization.

Although the existing property has been recognized by the State of California and is eligible for listing on the National Register of Historic Places, neither the subject site nor the property is recognized as a religious or cultural resource to Native Americans, including Native Hawaiians. Since closure of the Fred C. Nelles Youth Correctional Facility, neglect of the subject property has resulted in substantial deterioration in several of the existing historically significant structures or features contributing to the historic significance of the property.

- Transfer, lease, or sale of property without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

The State of California and City of Whittier are currently negotiating the sale/transfer of the property. Upon transfer of ownership to the City, mitigation measures have been prescribed to provide adequate protection of the identified historic resources.

The proposed project includes only the addition of territory (i.e., 218 acres within three subareas) to the existing Whittier Commercial Corridor Redevelopment Project Area. Subarea B encompasses the Fred C. Nelles Youth Correctional Facility, which is designated as an historic resource (i.e., California Historical Landmark No. 947) and is eligible for listing in the National Register. Although no development and/or redevelopment is currently proposed for this potential historic district, the Whittier General Plan and Whittier Boulevard Specific Plan provide for a range of densities and intensities of development for the subject property which, if implemented, could result in potentially significant impacts to the existing historic property.

The following specific impacts will occur as a result of project implementation:

- Physical destruction of, or damage to, all or part of an historical resource.

"It is the arrangement and the interrelationship of character-defining features, as they existed during the period of significance that is most critical to consider prior to treatment ... (Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes.)"

For a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. In addition, the relationships among the district's components must be substantially unchanged since the period of significance. Therefore, it is possible that future development and/or redevelopment that may occur within Subarea B of the Added Area could, through the relative number, size, scale, design, and location of the new buildings and/or structures, diminish the historical significance of the site as currently defined. A "district" is not eligible for listing if it contains so many alterations or new intrusions that it no longer conveys the sense of an historic environment.

- Alteration of an historical resource, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access that is not consistent with the Secretary's Rehabilitation Standards and Guidelines (36 CFR part 68).

As indicated above, project implementation does not currently include the demolition of any of the significant historic structures and/or contributing features. Demolition of identified contributing resources is not consistent with the Secretary's Rehabilitation Standards and Guidelines, which do not allow "... removing or radically changing ... site features which are important in defining the overall historic character of the property." However, future development and/or redevelopment that may be undertaken within Subarea B could propose the removal of one or more of the contributing resources, which could result in potentially significant impacts to the historic integrity and significance of the individual structures/features and/or historic district established for the Nelles property.

- Change of the character of an historical resource's use or of physical features within the historical resource's setting that contribute to its historic significance.

Project implementation will not directly result in a change in the character of the existing historical resource. However, future development and/or redevelopment occurring in Subarea B of the Added Area could result in the loss of one or more of the contributing resources comprising the proposed Nelles Historic District. Without proper mitigation as proposed in Section 4.9.5, the loss of such contributing resources would be potentially significant.

- Introduction of visual, atmospheric or audible elements that diminish the integrity of an historical resource's significant historic features.

Future development and/or redevelopment of Subarea B pursuant to the adopted long-range plans for the property would allow for the intensification of the use of the existing site. As a result, one or more of the existing identified historic structures and/or contributing features could be demolished or otherwise impacted by such development. It is possible that the introduction of contemporary development that is not designed to be compatible and/or harmonious with the existing recognized resources, the historic integrity of the site could be adversely impacted. Intensification of the site through the introduction of the new structures could result in potentially significant visual impacts that also diminish the historic integrity of the site.

Archaeological Resources

It is unlikely that any significant archaeological resources exist within Subareas A and C because both areas have been intensively developed. Neither area is identified in the City's General Plan or in prior surveys conducted in the City as having a high sensitivity for archaeological resources. Therefore, it is unlikely that future development and/or redevelopment occurring in those areas would yield significant

archaeological resources in either Subarea A or C. No significant impacts are anticipated in either subarea.

Based on the historic assessment (refer to Appendix C), a large area referred to as Open Space 2 located along the southern and southwestern limits of Subarea B (refer to Exhibit 4.9-1) has not been developed. In the early years of the school, and through the period of significance (i.e., 1912 to 1941), much of this area served as agricultural land, including areas used for farming and raising livestock, maintained by the wards of the correctional facility. Although this open space has diminished over the years through construction of new cottages and a high security building, it remains the largest continuous open space on the campus. Since the area has never been developed, it is possible that this land could yield important archaeological information related to the history of the school and its wards. Future development of this area, in particular, could result in the loss of important historic archaeological information. Therefore, mitigation has been proposed to ensure that any important artifacts and/or information can be ascertained prior to future development and/or redevelopment of this property.

Paleontological Resources

None of the three subareas are identified by the City as having a high sensitivity for paleontological resources. Further, Subareas A and C are intensively developed and a large percentage of Subarea B also supports improvements. As indicated previously for archaeological resources, any subsurface paleontological resources that may have existed prior to development of the proposed Added Area would have been destroyed at the time developed of those areas occurred. Therefore, future, development and/or redevelopment occurring within the Added area would not result in significant impacts to paleontological resources.

4.9.5 Mitigation Measures

Impact 4.9.1 Future redevelopment occurring within Subarea B (Nelles property) would result in the introduction of new commercial, retail and residential development that could result in the degradation of the significant historic resources currently occupying the property.

Because a specific plan has not been prepared for the Nelles property (Subarea B) that identifies the land use(s), density and/or intensity of development, and the location of future development within Subarea B, it is not possible to determine the nature and extent and, therefore, the significance of the potential impacts of that future development on the existing Nelles historic resource. However, in order to ensure that potentially significant impacts can be reduced to a less than significant level, the following measures are recommended and shall be considered, including in terms of feasibility, prior to approval of the specific plan prepared for Subarea B to address the potential impacts associated with future development of the Nelles property. More detail regarding these recommended mitigation measures can be found in the reports prepared by Chattel Architecture in Appendix C.

- MM 4.9-1a The City should designate the subject property as a local historic district (i.e., Nelles Historic District), effective immediately upon transfer of the property from the State to the City of Whittier.
- MM 4.9-1b The Nelles Historic District should be excluded from the provision of the City's Historic Preservation Ordinance that supersedes local protections for historic districts.
- MM 4.9-1c The City should require that the developer(s) of Subarea B enact a preservation program to reduce potentially significant impacts to the Nelles Historic Landmark (California State Landmark No. 947). At a minimum, the preservation program should include:
 - The majority of the contributing resources of the historic district should be retained.

- Contributing resources should be rehabilitated, restored and reconstructed in a manner that is consistent with the *Secretary's Standards*.
- New buildings should be designed in a contemporary manner compatible with historic district character.
- Historic archaeological resources should be identified and possibly recovered.
- Contributing resources to be demolished or altered in a manner not in conformance with the *Secretary's Standards* should be photo documented and interpreted.
- As part of the specific plan prepared for Subarea B, design guidelines should be prepared and implemented. Such guidelines should include an analysis of cultural landscapes and builder's handbook of architectural style and scale for new building as well as site development standards.
- The hierarchy of contributing resources and functionally related groupings as described in Appendix C should be used to inform decision-makers.
- Portions of the street grid from the historic district period of significance should be retained, and historic and new street cross-sections should maintain historic district character.
- Landscapes, open space, and older trees should be retained.
- The setting of contributing resources should be respected in the design of future development

MM 4.9-1d The City should engage a qualified historic preservation consultant reviewer (Reviewer/Monitor) to serve on the redevelopment team for Subarea B. The Reviewer/Monitor should meet the Secretary of the Interior's Professional Qualifications Standards in architectural history, historic architecture and/or history and have at least 10 years experience in design review and collaboration applying the *Secretary's Standards and Guidelines*. The Reviewer/Monitor should review and comment on treatments for rehabilitation, reconstruction, relocation and new construction proposed by the redevelopment implementation team. The Reviewer/Monitor should comment upon whether the design is implemented in accordance with assumptions and mitigation measures recommended in this EIR. Prior to approval of final construction plans and the start of construction, the Reviewer/Monitor should submit a report to the City summarizing critical historic preservation aspects, addressing unforeseen circumstances and outlining the role he or she will play during construction (the "historic preservation report"). The City should consider redevelopment of Subarea B in a manner consistent with the historic preservation report in the final development plans prepared for Subarea B. The Reviewer/Monitor should periodically monitor construction for consistency with the historic preservation report and final development plans, and participate in regular and special pre-development and development meetings with the redevelopment implementation team.

MM 4.9-1e Prior to any demolition activities in Subarea B, the City should prepare an Historic American Buildings Survey (HABS) Level II outline narrative descriptions of key property features, photo documentation and photographic reproduction of existing drawings. The documentation should be prepared by or under the direct supervision of either the Reviewer/Monitor or Consultant, and may be coordinated with preparation of other reports, including archaeological and cultural landscape reports, to avoid duplication of effort. Photo documentation should include a minimum of 250 large and medium format photographs of all contributing resources to the potential historic district on the redevelopment site.

Negatives, proofs and 8- by 10-inch archivally processed prints on double weight, fiber-based paper should be appropriately labeled. Selected historic and contemporary photographic images, including aerial photographs, should also be reproduced for inclusion in the documentary package. Representative selections from the existing original and as-built architectural drawings should be photographically reproduced. The City should place the photo documentation and photographic reproduction of drawings, along with the written narrative, in the collection of the State Architect's regional information center at California State University, Fullerton, City of Whittier Public Library, and Whittier Historical Society. Photography and drawings selection should be directed by a qualified professional meeting the Secretary of the Interior's Professional Qualifications Standards in architectural history, historic architecture and/or history. The qualified professional should determine the total number of photographs required, however a minimum of 250 photographs should be included in the documentation package. The City should retain a high-quality, laser or equivalent copy of the documentation in the project file.

Impact 4.9-2 *Because much of the entire site has the potential to yield important archaeological information and the area identified as Open Space 2 has not been developed, it is possible that future development occurring within Subarea B could result in the possible destruction of important historic archaeological materials and/or artifacts.*

MM 4.9-2 Prior to approval of a specific plan for Subarea B (Nelles property), a Phase I archaeological survey should be conducted in Subarea B. In the event the results of the Phase I site survey reveal a high or medium potential for the existence of important artifacts, a mitigation plan that may include Phase 2 and/or Phase 3 work should be submitted to the City for approval.

4.9.6 Level of Significance after Mitigation

No significant impacts to historic, cultural, or scientific resources will occur directly as a result of the proposed First Amendment to the Whittier Corridor Redevelopment Plan. However, it is possible that potentially significant impacts to the historic resources on the Nelles property would occur as a result of future development. Implementation of the recommended mitigation measures identified above will ensure that the potential significant impacts associated with redevelopment of the Nelles property (i.e., Subarea B) are reduced to a less than significant level. No significant unavoidable adverse impacts would remain. However, if it is determined that one or more of the recommended mitigation measures identified above are not feasible and cannot be implemented to mitigate a potentially significant impact resulting from the future development of the Nelles property that may be identified, it is possible that significant, unavoidable adverse impacts may occur.