CULTURAL RESOURCES ASSESSMENT

DRAFT ENVIRONMENTAL IMPACT REPORT

NORTH EMBARCADERO ALLIANCE VISIONARY PLAN

MASTER EIR

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I. **INTRODUCTION**

A. **Purpose**

The purpose of this Cultural Resources Assessment is to present a comprehensive document which (1) discusses and identifies known and potential cultural resources, historical and archaeological, within the Visionary Plan Area, (2) identifies potential impacts to such resources which might be caused by the Plan and (3) recommends mitigation for such impacts. This Cultural Resources Assessment is intended to serve as an Appendix to the North Embarcadero Alliance Visionary Plan Master EIR.

B. **Project Description**

The North Embarcadero Alliance Visionary Plan Area, hereafter referred to as the Visionary Plan Area, is included within Planning District 3, Center City Embarcadero, of the Port's Master Plan and within in San Diego's Centre City Community Plan area as illustrated by Figure 1 attached. The Visionary Plan Area's boundaries are the Burlington Northern Santa Fe Railroad tracks on the east, Market Street to Harbor Drive to the G Street Mole and the northern boundary of the South Embarcadero Master Plan Amendment area on the south, the pier head line to the west and Laurel Street and the southern boundary of the Airport Master Plan on the north.

Properties within the Visionary Plan Area are owned by the Port District, County of San Diego, City of San Diego and private individuals. All properties not owned by the Port District come under the jurisdiction of the Centre City Community Plan and Planned District Ordinance including the Centre City Planned District (north of F Street) and the Marina Planned District (south of F Street).

The project could require amendments to various adopted plans and ordinances to allow for the development of specific commercial recreation land uses, including the proposed hotels, restaurants, speciality retail and associated development in the Planning Area. In order to create a vibrant, publicly accessible waterfront district, the Visionary Plan proposes:

- An expansive (no less than 100 feet wide) bayfront esplanade extending the length of the water's edge, animated by public art, urban scale street furniture, public gathering places, scenic viewing areas and a garland of pedestrian street lights.

- Two civic "precincts" at the County Building and at the foot of Broadway, defined by publicly-accessible piers and acti-
vated by cultural facilities, public parks, overlooks, cruise and harbor boat activity, and commercial development.

- A grand tree-lined boulevard at Pacific Highway, creating an impressive image for the terminus of this historic road while accommodating through traffic, including traffic from the airport to downtown and the convention center.

- Commercial and residential development opportunities that enliven the area and provide critical public view and pedestrian access through the North Embarcadero and to the Bay.

- A parking strategy that ensures ample public parking and public access.

- Strategies for financing and implementing the public improvements.

The current street pattern establishes very long blocks between Pacific Highway and Harbor Drive. The Visionary Plan proposes a change in that street pattern to reconnect the City to the Bay.

The Visionary Plan also includes four specific projects:

- A San Diego Aircraft Carrier Museum on the south side of Navy Pier across from Buildings 1 and 12 at the Naval Supply Center,

- Development of the County Administration Center Parking Lots,

- Expansion of the Cruise Ship Terminal at the B Street Pier, and

- Development of Lane Field.

The purpose of this Cultural Resources Assessment is to evaluate the Visionary Plan's potential significant effects on existing cultural resources, both historical and archaeological, within the Plan Area. Within the Visionary Plan, the first two specific projects identified will require more extensive analysis than the other two projects. The creation of the San Diego Aircraft Carrier Museum on the south side of the Navy Pier will result in the USS Midway being attached to the Navy Pier. The USS Midway has been determined eligible for listing on the National Register of Historic Places as an object and the Navy Pier has been determined eligible for listing on the National Register as a structure. The U.S. Navy expects to enter into a Memorandum of Agreement (MOA) with the Advisory Council on Historic Preservation prior to the implementation of the Midway project. The MOA will specify many of the operating and maintenance requirements that are necessary to preserve the integrity of the Midway as an
historical resource.

The development of the County Administration Center Parking Lots may follow one of two scenarios. Each scenario would impact the parking lots which are included in the National Register listing of the property. One scenario, the Maximum Development Potential Site Plan, would result in approximately 984,300 square feet of new hotel, office, ancillary retail and parking on the existing North and South Parking Lots. The other scenario, the Active Open Space with Ancillary Uses Plan would result in approximately 200,000 square feet of office, retail, public serving and restaurant uses on the existing North and South Parking Lots. The landscape and hardscape surrounding the primary building were included in the property's nomination to the National Register. The proposed project includes following the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings. Compliance with these Standards and Guidelines would avoid significant impacts to the setting and integrity of this National Register property.

C. Guidelines for Assessment

Potential historical resources are to be assessed in accordance with the provisions of the California Public Resources Code which establish and implement the California Register of Historical Resources. Any property which has been determined eligible for inclusion in the National Register of Historic Places is automatically included in the California Register of Historical Resources. The National Register of Historic Places is the official list of districts, sites, buildings, structures and objects significant in American history, architecture, archaeology, engineering and culture. National Register criteria for evaluation are as follows:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

(a) that are associated with events that have made a significant contribution to the broad patterns of our history; or

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1 California Public Resources Code §5024.1.

2 Public Resources Code §5024.1(d)(1).

(b) that are associated with the lives of persons significant in our past; or

(c) that 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; or

(d) that have yielded, or may be likely to yield, information important in prehistory or history.⁴

In addition, resources which are associated with events that have made a significant contribution to the broad patterns of California's cultural heritage and resources which represent the work of an important creative individual are also eligible for the California Register.⁵ The California Register of Historical Resources is an authoritative guide to be used by state and local agencies, private groups and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.⁶

With reference to federally owned properties within the Visionary Plan Area, Section 106 of the National Historic Preservation Act applies. This Act requires any federal agency with jurisdiction over a federal undertaking to take into account the effects of the agency's undertakings on properties included in or eligible for the National Register of Historic Places and, prior to approval of an undertaking, to allow the Advisory Council on Historic Preservation (Council) a reasonable opportunity to comment on the undertaking.⁷

Section 110 of the National Historic Preservation Act requires the heads of all federal agencies to assume responsibility for the preservation of historic properties which are owned or controlled by such agency. Each federal agency must establish a preservation program which identifies, evaluates and, where appropriate, nominates properties to the National Register of Historic Places. Properties listed or determined eligible for the National Register must be managed and maintained in a way that considers preservation of their historic, archaeological,

⁴ Section 60.4, Criteria for Evaluation, National Register of Historic Places, 36 CFR 60.4.

⁵ Public Resources Code §5024.1(c).

⁶ Public Resources Code §5024.1(a).

⁷ 16 USC 470(f).
architectural or cultural values. The agency’s preservation-related activities must be carried out in consultation with other Federal, State and local agencies and, if appropriate, Indian tribes. The agency’s procedures must comply with Section 106. Compliance with Sections 106 and 110 satisfy the cultural resource requirements of the National Environmental Policy Act (NEPA).

Potential archaeological resources are to be assessed in accordance with Sections 15064.5 and 15126.4 of the California Environmental Quality Act Guidelines. The assessment must first determine whether the resource is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California and whether the resource meets California Register criteria. If the assessment determines that the archaeological resource is a historical resource, under California Register criteria, Public Resources Code §21084.1 and CEQA Guideline 15126.4 apply. If the assessment determines that the resource is not an historical resource but is a unique archaeological resource as defined in §21083.2 the Public Resources Code, that section applies. A unique archaeological resource is defined as an archaeological artifact, object or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; (2) has special and particular quality such as being the oldest of its type or the best available example of its type, or (3) is directly associated with a scientifically recognized important prehistoric or historic event or person. If the resource is neither an historical resource nor a unique archaeological resource, the effects of the project on the resource shall not be considered significant.

D. Methodology

1. Field Study

The historical field study consisted of a visual inspection of all extant structures within the Visionary Plan area by Scott A. Moomjian, M.A., J.D. and Dennis G. Sharp, M.A. Candidate.

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8 16 USC 470h-2
9 Public Resources Code §21083.2(g)
10 CEQA Guideline §15064.5(c).
Photographs were taken of selected sites. The archaeological field study was conducted by Dr. Ray Brandes and consisted of walkover and windshield field surveys as appropriate. Dr. Brandes has previously conducted extensive field surveys in this vicinity as the responsible archaeologist for the Columbia and Marina subareas of the Centre City Redevelopment Project.

2. Archival Research

The historical archival study included a limited research program investigating the Visionary Plan area in order to evaluate all properties during their historical evolution. Library and archival research was conducted at the following institutions or sources:

1) The San Diego Public Library, California Room
2) The San Diego Historical Society, Archives
3) The San Diego Historical Society, Photo Archives
4) City of San Diego Water and Sewer Records
5) National Register of Historic Places
6) State Historic Resources Data File for San Diego County
7) Private Collection/Library of Marie Burke Lia
8) Private Collection/Library of Dr. Ray Brandes
9) Private Collection/Library of BRG Consulting, Inc.

The archaeological study included a limited research program investigating the Visionary Plan Area in order to evaluate the vicinity in relation to its archaeological context. Archaeological research included a literature search, a review of map, photographic and manuscript information and any other data that would suggest the existence of any subsurface cultural resources. This research was conducted at the following institutions or sources:

1) The South Coastal Information Center at San Diego State University
2) Private Collection/Library of Dr. Ray Brandes
3) Private Collection/Library of BRG Consulting, Inc.

II. EXISTING CONDITIONS

A. Historic Setting

The Visionary Plan Area is a long narrow north/south strip of land west of California Street which is predominantly railroad tracks, south of Laurel Street, north of Harbor Drive (formerly Market Street at this location) and east of the San Diego Bay. However, only the eastern edge of this strip, between Pacific Highway and California Street existed before 1914. All of the land area west of Pacific Highway was created by the construction
of a bulkhead and the installation of dredged fill between 1914 and 1943.

Both strips of the Visionary Plan area, historic and filled land areas, can also be divided laterally in two sections. The southern section, between Harbor Drive on the south and Broadway on the north, was part of New Town San Diego founded in 1850. The upper section, between Broadway and Laurel, was developed in stages after the turn of the century and has been known as part of San Diego's Middletown area.

B. History of the Visionary Plan Area

1. New Town

Before 1850, activity in San Diego was focused at the Presidio, Old Town and the Mission San Diego de Alcala. But because Old Town was geographically constrained by steep hillsides on two sides and the sloughs of the Bay on the other two sides, individuals seeking expansion and development looked southwest to the tidal flats and open shoreline on the Bay. These individuals developed a partnership and a plan for a New Town near the site of an old Spanish landfall named Punta de los Muertos. The partnership was led by William Heath Davis and it would be his name that would be associated with New Town San Diego and its successes and failures.

The northern boundary of New Town was today's Broadway, its eastern boundary was today's Front Street and its southern and western boundaries were the tidal flats along the Bay. At this time, the mean high tide line ran along today's Pacific Highway on the west and just below what was then Market Street on the south. Much of the property included in the 160 acre 1850 mapped subdivision of New Town lay below the water line.

The San Diego City Council, then known as the Common Council, re-defined the City's boundaries to include New Town, and the first improvement Davis constructed was a deep water wharf just south of today's Navy Broadway Complex. This enabled ships to off-load cargo and passengers directly instead of the former practice of using lighters to ferry them to shore. This first activity in

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13 Western, pp. 4-187-188.
New Town became its dominant activity through the turn of the century.

Another important early development in New Town was the conveyance of two and a half blocks to the United States Army for a barracks, corral and related functions. While the corral block was ultimately replaced by a U.S. Post Office and Custom House use, the Barracks block remained in military hands until 1921. The Barracks Block, Assessor's Block 31 (Block 40 on Figure 2), bounded by today's Harbor Drive, Kettner, California and G Streets, has been identified as an important historic archaeological site. The history of Block 31 is described The San Diego Barracks, An Archaeological Assessment, prepared by Wirth and Associates, Inc. in June of 1980 and included in the Appendix to this Cultural Resources Assessment.

The driving force behind the development of New Town was the intention to link the harbor with anticipated rail lines to the east. However, the realization of this rail connection did not occur until later in the century, too late for New Town which never really bloomed during this period.

During the Civil War, the few extant structures in the New Town area were destroyed by Union soldiers, seeking firewood during the winters of 1861 and 1862. Wharves, warehouses, stores, fences and outbuildings were destroyed. For the most part, the only major buildings in the area which survived after the Civil War were military structures.

The fortunes of New Town were further diminished after Alonzo Horton's arrival on the scene. Horton chose not to develop in New Town, which was already in private hands, and instead purchased property to the east and north of New Town. And, after Horton built his large T shaped wharf at the foot of Fifth Avenue in 1869, it attracted all of the larger vessels.

This is not to say that New Town lost out on all trade. In 1868, Stephen S. Culverwell constructed a wharf at the foot of today's

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15 A more complete history of this site, along with original floor plans, can be found in "The San Diego Military Barracks, 1850-1921", by Dr. Ray Brandes, University of San Diego (1989).


F Street which extended 150 feet into the Bay and that wharf survived past the turn of the century as Jorres Wharf.\textsuperscript{18}

However, during the 1870s, what little growth there was in downtown San Diego took place in Horton's Addition rather than in New Town. The 1880s ushered in the "boom" and "bust" periods which were related to the arrival and disappearance of the rail line to the East. During the boom periods, however, streets were graded and paved, a sewer system was installed and several large wharves were constructed along the New Town shoreline.\textsuperscript{19} These wharves became the focal point for the importation of goods into San Diego.

On the New Town waterfront, the Davis and Culverwell's wharves were followed by the Spreckels Brothers Wharf, also known as the coal bunkers wharf. This 1888 Wharf, located at the foot of today's G Street, was approximately 2000 feet long and followed a zig zag configuration. It used rail cars, steam-driven cable lines and winches to unload cargos of coal, cement and lumber.\textsuperscript{20}

The 1887 construction of the Santa Fe Depot, at what was then the foot of Broadway, impacted several wharves in the New Town area. These wharves imported all the necessary materials to build a growing city but exported little because no rail access existed to the agricultural areas of the region.\textsuperscript{21}

New Town developed into a service area for the wharves and the railroads. It contained warehouses, storage yards and lumber yards. In 1890, the Spreckels Wharf at the foot of G Street and the Santa Fe Wharf at the foot of Broadway, combined, docked 122 vessels. In 1891, that figure rose to 286 vessels.\textsuperscript{22}

However, local newspapers in 1888 also described the entire waterfront area from Cedar Street on the north to Tenth Avenue on the south as "Shantytown" primarily because the houses located on the tidelands were on stilts. During this period, the waterfront community was described as the "poorest, most disorderly and degraded section of our City".\textsuperscript{23} A portion of the Shantytown

\textsuperscript{18} Western, p. 4-188.
\textsuperscript{19} Ibid.
\textsuperscript{20} Western, p. 4-188.
\textsuperscript{21} Brandes (1985), p. 70.
\textsuperscript{22} Ibid.
\textsuperscript{23} Brandes, "An Historical/Archaeological Study of Blocks SD 18 and SD 19 New Town San Diego (New Town), San Diego,
structures and the Military Barracks are illustrated in the 1889 photograph included in the Appendix to this Study as Historical Photograph #1.

As illustrated in the 1904 Sanborn Maps, the waterfront areas of New Town, north and south, were covered with wharves and structures on land to serve those wharves, interspersed with shanties.24 South of Market Street, 30 small wharves occupied the three block area between California and Columbia Streets.25

By 1906, a warehouse/industrial district had developed that would remain as the principal activity of the area for years to come. The few residences which had existed were replaced by smaller business buildings related to storage and transportation. The shanties along the waterfront were essentially houses on stilts occupied largely by squatters, Chinese fishermen, retired longshoremen and laborers.26 Conditions in New Town are vividly illustrated in the March 4, 1910 aerial photograph published in the San Diego Union and included in the Appendix to this Study as Historical Photograph #2.

At the north end of New Town, along Broadway, the turn of the century found a different type of development. Large bathhouses, such as the Tropical Navatorium and the Los Banos, were established across from the Santa Fe Depot. Hotels, rented rooms with communal bathrooms, restaurants, saloons and small businesses were found along the Broadway frontage until the 1920s. The impetus for this development west along Broadway to the water, came from John D. Spreckels, who took over Horton’s role as the leading developer of the City.27

In the first decades of this century, two major developments were to occur, almost simultaneously, which would change the character of both the New Town and Middletown segments of the Visionary Plan Area forever. The first development was the anticipated opening of the Panama Canal. Because San Diego would be the first American port to be reached by the increased trade generated by the Canal, the City fathers wanted to make a good showing, especially along the waterfront. Many of the shanties in the Plan area were removed during the general, civic clean up that occurred before 1915.


24 Western, p. 4-188.
25 Brandes (1985), p. 74
26 Ibid.
The other development changed the form of the waterfront forever. In 1911, San Diego and other cities petitioned the State to grant the tidelands within their respective harbors for development. The bill authorizing this transfer required that the City make improvements by dredging, filling and constructing bulkheads within these tideland areas.26

The nature of the dredging operations which followed were such that the shanties, piers and wharves that were located along the waterfront, north and south, were all buried beneath the dredged fill.

The project to advance the shoreline westward 400 feet was begun in 1914. Fill activities began along the west side of Pacific Highway, from Broadway north to Date Street. During the following twenty-nine years, the balance of the shoreline, from Market Street to Laurel Street was filled in. The method of filling was to first erect a wooden retaining wall. The wall's base was below the lowest low tide level and its top was approximately 10 feet above the mean sea level. Dredged sediment slurry was then pumped from the open bay to shoreward of the wall. Excess water drained through slots in the wall, leaving dredged sediment as fill. After the filling in the southern area was complete, by 1918, docks were extended in some locations seaward from the top of the bulkhead wall, thereby forming the ultimate wharf for shipping. The final filling of the project area's waterfront resulting in the present configuration of the waterfront and Harbor Drive, was completed in 1943.27

And finally, beginning in 1919 and during a series of transactions thereafter, the City deeded approximately four city blocks to the Navy. These blocks were at the northwestern edge of New Town between Broadway and Harbor Drive (Market) and Pacific Highway and the newly installed bulkhead on the west.28 This new land area became the Visionary Plan areas's Navy Broadway Complex.

The only historical resources remaining from the New Town era are Pantoja Park, dedicated by Davis in 1850 and named for Don Juan Pantoja y Arriaga who mapped the Bay in 1872, the site of the Military Barracks on Block 40 of Figure 2 in the Marina District and Rosario Hall, a structure relocated to Centre City East and modified in the 1920s.

26 Western, p. 4-188.


28 Western, p. 4-188.
2. Middletown

To the extent that the Visionary Plan Area north of New Town was identified, the name Middletown is often used, meaning the area between Old Town and New Town. This area developed much later and much more slowly than New Town. For decades it consisted mainly of a road with scattered houses between the two settlements.  

The southern portion of Middletown, between Broadway and Date Street developed first. By the 1880s, the blocks immediately north of Broadway reflected the type of development that was consistent with the harbor development and rail service that had been established in the area. The blocks just west of the Santa Fe Depot, between California and Pacific Highway, contained railroad related structures and small dwellings which may have been shanties constructed by squatters. In 1888, on the west side of Pacific Highway, several Bath Houses were operating on piers to serve salt water bathing patrons. By 1906 those bath houses had been joined by a series of small pier like structures on the water.  

The waterfront conditions existing south of Broadway were repeated north of Broadway but the wharves and piers were smaller as illustrated in Historical Photograph #2.

Before and after World War I, a series of major changes occurred in the Visionary Plan Area. As in New Town, the shanties were cleaned up in a spurt of civic zeal and new shoreward lands were created by dredge and fill operations between 1914 and 1918. Then, in the 1920s, the opening of the transcontinental highway brought San Diego into the national highway network. California's Highway 101 followed Pacific Highway into downtown San Diego and led to Market Street as the route to the Lee Transcontinental Highway to the east. The creation of this major thoroughfare had a dramatic impact on land uses along the route in Middletown. New Town had similar impacts but more of this national thoroughfare ran through Middletown.

The focal point for the delivery of goods into San Diego changed from the waterfront of the Visionary Plan Area to the highway connections of the Area.


32 1906 Sanborn Maps.


While new transit-oriented uses were being established along Pacific Highway, the pace of the dredge and fill operations was also impacting Middletown's historical development. Between 1914 and 1918, the new waterfront had been completed as far north as Date Street and, by 1935, it had been partially created beyond Date, as illustrated in Historical Photograph #3.

As also illustrated in Historical Photographs #3 and #5, by 1935 the most prominent use of the filled lands at the south end was a professional ball field, Lane Field, which, with its parking, occupied the city blocks between Broadway and A Street and Pacific Highway and the new Harbor Drive. The County Administration Center was yet to be constructed on the blocks between Ash and Grape Streets, Pacific Highway and Harbor Drive and the fishing community's piers and vessels are apparent in the partially filled area north of Date Street.

North of Ash Street on the east side of Pacific Highway, the scattered residences present in the 1920s were gradually replaced by uses serving the new highway or the commercial fishing industry that was developing north of Date Street. This is further evidenced by 1921 Sanborn maps, which show the waterfront area between Hawthorne and Laurel, west of Pacific Highway, as home to the Neptune Sea Food Company, the Pompeian Sea Food Companies, the Steele Packing Company and the Arrow Packing Company. Each of these canneries also had adjoining fish unloading and cleaning piers extending into the Bay.

Although fishing had always been an important calling in San Diego, by the Native Americans, Chinese, Japanese and Portuguese in the community, the waterfront area of Middletown was settled by Italian fishermen and their families. By the turn of the century, the local Italian population had grown as did their ownership of fishing vessels, fish markets and restaurants in the area. A snapshot of this fishing community appears in Historical Photograph #4. These Italian families were historically important in Middletown and in the commercial and business life of the City in general. By 1937, the Visionary Plan Area south of Laurel was established with fish canneries and the homes of the Italian fishing community and the growing aircraft industry.

Cultural resources remaining from the historic era of Middletown are present in the Centre City neighborhood of Little Italy which is adjacent to the Visionary Plan Area. These resources consist of homes, commercial properties and Our Lady of the Rosary

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35 Sanborn Maps, various years.

Catholic Church which serves the Italian Catholic community city-wide. These resources are more extensively discussed in Section II.C.2. below.

C. Historical Resource Potential

1. Visionary Plan Area

The Visionary Plan Area contains a small but important number of historical resources. Three of these resources have been listed on the National Register of Historic Places. They are two vessels of the Maritime Museum on North Harbor Drive, the Berkeley and the Star of India, and the San Diego County Administration Center at 1600 Pacific Highway. It is important to note that the entire County Administration Center property is listed, including the two parking lots. By virtue of their National Register listings, these resources are also listed on the California Register of Historical Resources.

Three other resources within the Visionary Plan area have been determined eligible for the National Register of Historic Places. These resources are Buildings 1 and 12 of the Naval Supply Center command at the Navy Broadway Complex, (on Blocks 27 and 30 respectively of Figure 2) and Building 11, the Navy Pier, across the street from that complex\(^\text{37}\) (Block 46 of Figure 3). These three buildings were addressed in a Cultural Resources Study prepared as part of an Environmental Impact Statement for the 1990 Navy Broadway Complex. The Cultural Resources Study was prepared for that project in accordance with Section 106 of the National Historic Preservation Act, using National Register Criteria for Evaluation (36 CFR 60.4). That study found that these three buildings meet National Register Criteria as a single architectural and historical group, representing the entire development history of the Navy Broadway Complex and that they are the primary contributing features to the overall architectural character of this area of the waterfront.\(^\text{38}\) The State Historic Preservation Officer (SHPO) concurred with those findings.\(^\text{39}\)

Another property has been determined potentially eligible for the National Register, the site of the nineteenth century military barracks in the Marina District, (Block 40 of Figure 2). This property was the subject of a study by Dr. Ray Brandes and it was

\(^{37}\) Although the transit shed portion of Building 11 has been demolished, the Navy Pier remains.

\(^{38}\) Western, p. 4-203.

\(^{39}\) Western, p. 4-187.
his opinion that the property would be eligible for the National Register as a site that may be likely to yield information important in prehistory or history. The State Office of Historic Preservation reviewed the Brandes study but determined that more study would be needed to determine the significance of subsurface resources at this location. Subsequently, archaeological testing was conducted on this site, which is identified as CA-SDI-15,037. The testing included 19 backhoe trenches (2,400+ liner feet), 8 hand excavated units, 3 backhoe scrapes and the full exposure of the cistern and barracks foundation. No privies or trash deposits were located although the same are believed to be present on the site and would be expected to yield information of value in historic archaeology. The site should be monitored during any future grading and excavation activities. For the purpose of this Cultural Resources Assessment, the military barracks site is considered an historical resource under California Register criteria as required by the CEQA Guidelines discussed above in Section I.C. of this Assessment.

The Visionary Plan area contains one additional resource, the 1909 San Diego Grain and Milling Company/Parron Hall Office Interiors building at 820 West Ash Street (Block 14 of Figure 2). This resource has been listed on the local Historical Site Register.

Historical research for this Cultural Resources Assessment has identified two other groups of potential resources within the Visionary Plan Area. One group is composed of the three piers at or near the foot of Grape Street which were built in 1951 to replace an historic pier at that location (Block 42 of Figure 2). The other group is composed of three small craftsman bungalows on the 1900 block of the east side of California Street which faces the railroad tracks (Block 8 of Figure 2). Although the three Grape Street Piers were included in the 1988/1989 Historical Resources Inventory of the Harborview area of Centre City, they were not considered for local historical site designation because of their location within the Port District's jurisdiction. The three small bungalows were missed by that same Inventory.

Application of California and National Register criteria to the Grape Street Piers results in the conclusion that the Piers are not eligible under either criteria. Their significance could only be based on their association with events that have made a

40 Interview with Dr. Ray Brandes, August 27, 1999.

41 1992 Master Environmental Impact Report for Centre City Redevelopment Project, Figure 4.E-1.

significant contribution to the broad patterns of our history (Criterion A) and these piers are actually 1951 replacements of the original pier which was directly associated the Italian fishing community.

Application of California and National Register criteria to the California Street Bungalows results in the same conclusion. Although these bungalows were associated with the early Italian fishing community, they have been substantially altered and two of the three have been converted into garages. In order to meet Criterion A, the properties must have an important association with the historic events and must retain their integrity. These bungalows do not meet those standards.

The locations of the known and potential resources that were evaluated for purposes of this Assessment are shown on Figure 3 in the Appendix.

In addition to the existing historical resources within the Visionary Plan Area, as the result of a specific or subsequent project, the area will receive another historical resource. The USS Midway, an aircraft carrier, is proposed to be decommissioned and delivered to the south side of the Navy Pier to serve as the San Diego Aircraft Museum (SDACM). As discussed above, the Navy Pier has been determined eligible for the National Register and is thus listed on the California Register of Historical Resources. The Midway would be docked against two new mooring platforms rather than tied directly to the Pier. Visitors would access the Midway via two suspended "gangplank" bridges from the Pier. The Pier itself will contain the Visitor Center for the SDACM and visitor parking which will be shared with Navy personnel on weekdays. A new pedestrian way along the perimeter of the Pier would also be established.

The Midway has been determined eligible for the National Register of Historic Places but has not been listed on the Register. Once the Midway has entered the State of California, it will be listed on the California Register of Historic Resources by virtue of its National Register eligibility.

2. Visionary Plan Area Vicinity

Within a three block radius of the Visionary Plan Area are three properties listed on the National Register of Historic Places. They are the McCleintock Storage Warehouse at 1202 Kettner Boulevard, the Santa Fe Depot on lower Broadway and the Old Police Station at 700 West Market Street. By virtue of their National Register listings, these resources are also listed on the

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43 Dr. Jay Thomas, Historian, U.S. Department of the Navy.
California Register of Historical Resources. It should be noted, however, that the demolition of all or part of the Old Police Station has been the subject of a recently certified Environmental Impact Report.

Two other properties within the vicinity of the Visionary Plan Area have been determined eligible for the National Register of Historic Places. They are the Armed Forces YMCA on lower Broadway and Station B across Broadway from the Santa Fe Depot. By virtue of their National Register eligibility, these resources are also listed on the California Register of Historical Resources.

Within the vicinity of the Visionary Plan are a number of locally designated historical resources, the oldest being the Plaza de Pantoja y Arriaga, at Columbia and G Streets in the Marina District, which was established as a public park when New Town was created in 1850. The County-owned Star Builders Company building at 726 West Beech is also locally designated as is San Diego's Fire Station #6 at 1572 Columbia Street. Twelve designated sites in Little Italy are within this vicinity as well. On India Street the designated sites include the Pintzelberg Commercial building, DeFalco's Grocery, Tait's Meat Market, Auto Body Company and McDonough Cleaners. On Kettner Boulevard the designated sites include the Electrical Products Company building, the San Diego Marconi building, a sidewalk stamp, and the A.W. Pray Rentals. On Columbia Street two sites are designated, St. Anne's Clinic and the Tait Rental, and on West Ivy Street one site is designated, the Adams-Henry Company.

In 1988-1989, an Historic Resources Inventory of the Harborview subarea of Centre City was prepared for the Centre City Development Corporation by Marie Burke Lia and Dr. Ray Brandes, as consultants to the Redevelopment Agency. That Inventory identified a number of potential resources within the vicinity of the Visionary Plan Area. The complete Inventory was evaluated by the City of San Diego's Historical Site Board in 1990-1991 and, as a result, a number of these inventoried properties were designated as local historical sites. The inventoried properties not designated were found not to qualify as historical resources and therefore are not referenced in this Cultural Resources Assessment.

D. Archaeological Resource Potential

1. Visionary Plan Area

The Visionary Plan Area, which is primarily composed of dredged fill, contains no potential prehistoric archaeological resources but it does contain an historical resource under California Register criteria, in New Town's San Diego Military Barracks
located on Block 40 of Figure 2 in the Marina District. Block 40 is bounded by Market and G Streets, Kettner Boulevard and California Street. This site has been determined eligible for the California Register as it is significant in the military and cultural annals of California.

Block 20 of Figure 2, which is located between A and B Streets and Pacific Highway and California Street, is now occupied by a structure and parking lot serving the golf driving range to the south. The 1888 Sanborn Map shows some 42 small structures or shanties on this block and these structures remained until the 1920s even though the property was owned by the railroad. Previous archaeologically examined sites in the Columbia and Marina Districts of Centre City have been hotels, restaurants, commercial structures and a few middle class homes. The structures that were formally on Block 20 were likely occupied by a different class of people and therefore subsurface cultural resources which might be present could broaden our understanding of the cultural history and diversity of the Visionary Plan Area.

Block 8 of Figure 2 contains the three California Street bungalows located in the 1900 block of that street and facing the railroad tracks. It is believed that the subsurface area beneath these bungalows, which date from the 1920s, could provide additional cultural information about the early Italian fishing community.

At the southwest corner of Block 24 of Figure 2, bounded by West Broadway, Pacific Highway, Harbor Drive and B Street, was the 1928 Harbor Café Fountain and Grill. This structure, which was demolished in 1985, was frequented by tourists, celebrities, athletes and other persons visiting Lane Field and the Broadway Pier area. It is visible in the 1932 Historical Photograph #5 included within the Appendix to this Study. Archaeological monitoring of this site might produce additional subsurface cultural resources from the Visionary Plan Area.

These known and potential archaeological sites are illustrated in Figure 3 in the Appendix. The record search from the South Coastal Information Center is contained in Volume II of the Appendix.

2. Visionary Plan Area Vicinity

Because the Visionary Plan proposes no specific activities within this area which would impact subsurface cultural resources, the archaeological resource potential of this area was not evaluated.
III  ENVIRONMENTAL ANALYSIS

A. Identification of Potential Impacts

1. Historical Resources

The most significant potential impact of the Visionary Plan could be the substantial alteration of the County Administration Center complex, a National Register listed site. The landscape and hardscape surrounding the primary building, including the parking lots, were included within the property's nomination to the National Register and the Visionary Plan's proposed development of these parcels of land could substantially impact the setting and integrity of this National Register property.

As discussed above in section I.B., two scenarios are proposed for the parking lots adjacent to the County Administration Center on the north and south. The Maximum Development Potential scenario would result in 984,300 square feet of new hotel, office, ancillary retail and parking on the two parking lots and the Active Open Space with Ancillary Uses would result in approximately 200,000 square feet of new office, retail, public serving and restaurant uses on the two parking lots. Figure 3.3-21 of the Draft Environmental Impact Report illustrates the maximum development potential and indicates that the proposed new development would be separated from the existing County Administration Center by approximately one-half block. It is assumed that the Active Open Space with Ancillary Uses would result in a comparable setback from the County Administration Center although no Site Plan is contained in the Draft Environmental Impact Report for this lesser development scenario.

As will be discussed more extensively in section III.B.1. below, potential adverse impacts from the development of the County Administration Center Parking Lots can be avoided by complying with the Secretary of the Interior's Standards for the Treatment of Historic Properties as is proposed.

The proposed westward extension of E Street through the Navy Broadway Complex could potentially adversely impact the National Register eligible Buildings 1 and 12 of the Naval Supply Center. However, as the result of a 1990 Section 106 consultation between the Navy, the State Historic Preservation Officer and the Advisory Council on Historic Preservation, it has been determined that the environmental impacts from demolition of Buildings 1 and 12 can be reduced to below a level of significance by recordation of the buildings pursuant to Section 110(b) of the National
Historic Preservation Act. Consequently, the proposed westward extension of E Street would have no environmental impact.

The proposed removal of the three Grape Street Piers and the three California Street Bungalows, which do not qualify as historical resources under CEQA, would have no environmental impact.

The proposed docking of the USS Midway at the south side of the Navy Pier would bring together two National Register eligible properties. The retention of the Navy Pier would avoid adverse impacts to that property which is also listed on the California Register of Historical Resources. Moved or relocated properties can retain their National Register eligibility if the project which accomplishes such purpose complies with National Register Criterion Consideration B: Moved Properties. That Criterion specifically provides that a property designed to move, or a property frequently moved during its historic use, may retain its National Register eligibility if it is relocated to a historically appropriate setting and if it retains its integrity of setting, design, feeling and association at the new location. Properties that are appropriate for this Criterion Consideration include ships. The example used to illustrate this Criterion notes that a ship docked in a harbor would retain its eligibility whereas a ship on land in a park would not. Therefore, it can be assumed that the relocation of the USS Midway to the south side of the Navy Pier would avoid potential adverse impacts to the aircraft carrier. Actually, it is difficult to conceive of a more appropriate location for this vessel since the Navy Pier was built during World War II specifically to serve such vessels as the USS Midway and three other memorials to our naval forces are installed nearby.

The retention of the Navy Pier and its reuse as the new home of the USS Midway is equally appropriate, the Pier will continue to serve one of the vessels it was built to serve. Potential impacts to the Pier would also be avoided by the implementation of the proposed SDACM project. This specific project within the Visionary Plan complies with Section 110 of the National Historic Preservation Act which requires that federal properties be managed and maintained in a way that considers the preservation

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44 Western, p. 4-211


46 Ibid.
of their historic, archaeological, architectural or cultural values.\textsuperscript{47}

The proposed relocation of the Maritime Museum vessels on the waterfront would not impact their historic integrity or significance for the same reasons as discussed above for the USS Midway.

2. Archaeological Resources

Implementation of the proposed Visionary Plan will directly facilitate development on a number of blocks and influence development on other blocks within the Plan area. Such development will, most likely, adversely impact subsurface cultural resources. These impacts will occur on the blocks shown in Figure 3 containing potential subsurface cultural resources described above. These blocks are Number 40, the former Military Barracks, Number 20, the golf driving range, Number 8, the California Street bungalows and Number 24, the former Harbor Café.

B. Application of Impact Significance Criteria

1. Historical Resources.

Resources within the Visionary Plan Area include the Star of India, the Berkeley and the County Administration Center are all listed on the National Register of Historic Places. Buildings 1 and 12 and the Navy Pier of the Navy Broadway Complex have been determined eligible for the National Register and are therefore listed on the California Register of Historical Resources. The San Diego Grain and Milling Company/Parron Hall has been listed on the City of San Diego Historical Site Register. The USS Midway has been determined eligible for the National Register and will qualify for the California Register of Historic Places when it is docked within the State of California.

Under California law, once a property is included in a local register or the California Register it attains the status of an "historical resource" subject to the protection of CEQA pursuant to Public Resources Code §21084.1.

This Public Resources Code section reads, partially, as follows:

\begin{quote}
A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. For purposes of this section, an historical resource is a resource listed
\end{quote}

\textsuperscript{47} 16 USC 470h-2.
in, or determined eligible for, the California Register of Historical Resources.

A substantial adverse change is defined, for purposes of CEQA, in Public Resources Code §5020.1(q) which reads, partially, as follows:

(q) "Substantial adverse change" means demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired.

The application of these principles is more extensively explained in CEQA Guideline 15064.5. Subsection (b)(1) of that Guideline defines substantial adverse change in the significance of an historical resource as physical demolition, destruction, relocation or alteration in the resource or its immediate surroundings such that the significance of the resource would be materially impaired. Subsection (b)(2) defines materially impaired as when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its significance and justify its inclusion in the California Register.

Substantial adverse change may be avoided by following 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. This course of action will mitigate impacts to historical resources to less than a level of significance.48

The lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of historical resources and shall ensure that such measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements or other measures.49

Under Federal law, Section 106 of the National Historic Preservation Act requires that the U.S. Navy take into account the effects of its undertakings on properties included in or eligible for the National Register, which, for purposes of the Visionary Plan, includes Buildings 1 and 12 and the Navy Pier of the Navy Broadway Complex and the USS Midway. Section 110 of that Act requires that such properties be managed or maintained in a way that considers the preservation of their historic,

48 CEQA Guideline 15064.5(b)(3)
49 CEQA Guideline 15064.5(b)(4)
archaeological, architectural or cultural values and that the agency's preservation related activities be carried out in consultation with the State Office of Historic Preservation and the Advisory Council on Historic Preservation. As discussed above in section III A.1. of this Assessment, the U.S. Department of the Navy has complied with Sections 106 and 110 with reference to Buildings 1 and 12 of the Navy Broadway Complex and, as the result, the environmental impacts of any future demolition of those buildings will be reduced to below a level of significance by recordation of those buildings prior to demolition.

As discussed above in section III.A.1., potential environmental impacts from the Visionary Plan have only been identified for the County Administration Center. All other aspects of the Visionary Plan will either not impact identified historical resources at all or will not adversely impact them, i.e. will not cause a substantial adverse change as that term is defined in California law.

The issue for the County Administration Center is whether either development scenario will result in a substantial adverse change to the National Register resource which consists of the property between Harbor Drive and Pacific Highway and Ash and Grape Streets. Although the National Register Nomination established these boundaries for the resource, it did not specifically address aspects of the property outside the main building. As discussed above, under CEQA Guideline §15064.5(b)(1), substantial adverse change means physical demolition, destruction, relocation or alteration in the resource or its immediate surroundings such that the significance of the resource is materially impaired. The issue is whether these development scenarios would alter the immediate surroundings of the resource such that its significance will be materially impaired. The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Rehabilitating Historical Buildings will be applied to this project to provide the guidance necessary to avoid material impairment of affected resources.

The relevant Standards and their respective Guidelines for the development of the County Administration Center property are as follows:

Standard #2: The historic character of a property shall be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property shall be avoided.  

Relevant Guidelines for Standard #2: The operative words are the alteration of spaces and spatial relationships that characterize the property shall be avoided. The relationship between a historic building and landscape features within a property's boundaries help define the historic character and should be considered an integral part of overall planning for the project. Such features can include driveways, walkways, lighting, fencing, benches, fountains, plants and trees. The historic relationship between buildings, landscape features and open space should be retained. Adjacent new construction should be compatible with the historic character of the site and should preserve the historic relationship between the building, landscape features and open space. Removing non-significant buildings which detract from the historic character of the site, such as the County Health and Human Services Building, is recommended. Introducing new construction which is visually incompatible in terms of size, scale, design, materials, color and texture or which destroys historic relationships on the site is not recommended. Removing a site feature which is important in defining the historic character of the site is not recommended.  

Standard #9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.  

Relevant Guidelines for Standard #9: The operative words are that the new construction should not destroy the spatial relationships which characterize the property. Therefore, the first step must be to identify the spatial relationships which characterize the property. Next, the new construction should not obscure from public view the character-defining features of the County Administration Center. The new construction should be located on an inconspicuous side of the historic building and its size and scale should be limited in relation to the historic building. The new construction should be designed in a manner that makes clear

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52 Secretary of the Interior's Standards for the Treatment of Historic Properties.
what is historic and what is new.\textsuperscript{53}

Standard #10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future the essential form and integrity of the historic property and its environment will be unimpaired.

This standard is self-explanatory and likely easily met in planning the new development for the County Administration Center property.

As stated above, the proposed compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties will reduce any potential impacts to the County Administration Center to below a level of significance.

2. Archaeological Resources

As discussed above in section I.C., archaeological resources are to be assessed in accordance with §15064.5 and §15126 of CEQA Guidelines and if an assessment determines that a resource is an historical resource under California Register criteria, Public Resources Code §21084.1 and CEQA Guideline 15126.4 apply. As discussed above in section II.C.1., the military barracks site on block 40 of Figure 2 is considered an historical resource under California Register criteria. Consequently, that site is an "historical resource" as that term is defined on Public Resources Code §21084.1 and any project which would cause a substantial adverse change in the subsurface cultural resources of that block would result in a significant impact. Such impacts can be reduced to below a level of significance by compliance with CEQA Guideline §15126.4.

The potential subsurface cultural resources on blocks 20, 8 and 24 of Figure 2 are not listed on the California Register and it is not anticipated that they would qualify for that Register. It cannot be determined whether such resources would qualify as unique archaeological resources as that term is defined in Public Resources Code §21083.2, however, for the purposes of this Assessment, they should be considered potentially unique. If an archaeological site does not meet the California Register criteria but does meet the definition of a unique archaeological resource in §21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of §21083.2 but the time and cost limitations of that section (c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological

\textsuperscript{53} Guidelines for Rehabilitating Historic Buildings, pages 58-59.
resources. If an archaeological resource is neither an historical resource or a unique archaeological resource, the effects of the project on the resource shall not be considered a significant effect on the environment.

IV IDENTIFICATION OF POTENTIAL MITIGATION MEASURES

A. Historical Resources

Potential adverse impacts to the County Administration Center and grounds will be mitigated to below a level of significance by site and development planning which will not result in a substantial adverse change in the significance of the resource. Substantial adverse change will be avoided by following the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings. This course of action will mitigate impacts to historical resources to below a level of significance. Two development scenarios are proposed, and it is assumed that for each scenario the new development would be set back approximately one-half block from the resource. Compliance with the Secretary's Standards should concentrate on Standards 2, 9 and 10 as is more extensively discussed above in section III.B.1.

B. Archaeological Resources

Potential adverse impacts to the military barracks site, which has been determined to qualify for the California Register, can also be avoided by site and development planning which will not result in a substantial adverse change in the significance of the resource. Substantial adverse change in an archaeological resource can be avoided by the implementation of the mitigation measures called for in CEQA Guideline §15126.4. The Environmental Secondary Study for Park Place Condominiums, dated August 13, 1999, determined that potential adverse impacts to the site could be avoided by Mitigation Measure E-2 of the MEIR for the Centre City Redevelopment Project, as follows:

A qualified archaeologist is required to carefully monitor the excavation and grading activities while the project is underway. If resources are encountered in the course of ground disturbance, the archaeological monitor shall be

54 CEQA Guideline §15064.5(c)(3).
55 Ibid.
56 CEQA Guideline 15064.5(b)(3).
empowered to halt grading and to initiate an archaeological testing program. The testing shall include the recordation of artifacts, controlled removal of materials and an assessment of their importance under CEQA and local guidelines.\textsuperscript{57}

The mitigation measure recommended by the Secondary Study should be supplemented by mitigation consistent with CEQA Guideline \$15126.4 which provides:

When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be deposited with the California Historical Resources Regional Information Center. Archaeological sites known to contain human resources shall be treated in accordance with the provisions of Section 7050.5 Health and Safety Code.\textsuperscript{58}

In order to resolve the status of any potential subsurface resources under the golf driving range, Block 20, under the California Street bungalows, Block 8, and at the site of the former Harbor Café, Block 24, further archaeological investigation should take place at each site to determine whether the site may contain unique archaeological resources as defined in \$21083.2 of the Public Resources Code. If the investigation determines that unique archaeological resources are present at any site, a determination shall be made as to whether the resources should be preserved in place or excavated as mitigation. Excavation as mitigation may not be required if the investigation's testing or studies have already recovered the scientifically consequential information from and about the resource.\textsuperscript{59}

Potential adverse impacts to the potential subsurface cultural resources of Blocks 20, 8 and 24 can be mitigated by an archaeological investigation to determine whether unique archaeological resources meeting the criteria of Public Resources Code \$21083.2 are present, and if such resources are present by mitigating the impacts to such resources in accordance with that Code section as discussed above.

\textsuperscript{57} Lettieri-McIntyre, Attachment A, p. 4.

\textsuperscript{58} CEQA Guideline \$15126.4(b)(3)(C).

\textsuperscript{59} Public Resources Code \$21083.2(b)-(d).
V. SIGNIFICANCE OF POTENTIAL IMPACTS AFTER MITIGATION

A. Historical Resources

As more extensively discussed above in section III.B.1., potential significant impacts to the County Administration Center and grounds will be avoided or reduced to below a level of significance by complying with the appropriate standards and guidelines established by the Secretary of the Interior. In each instance, the following standards are relevant:

Standard #2: The historic character of the property must be retained and preserved. The removal of distinctive materials or alteration of features, spaces or spatial relationships that characterize the property shall be avoided.

Standard #9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

Standard #10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future the essential form and integrity of the historic property and its environment will be unimpaired.\(^60\)

The proposed new development on County Administration Center property will avoid altering spaces or spatial relationships that characterize the property and will otherwise comply with the applicable Standards and Guidelines of the Secretary of the Interior, therefore, significant impacts to this California and National Register site can be mitigated to below a level of significance.

B. Archaeological Resources

Potential significant impacts to archaeological resources can be mitigated to below a level of significance by implementation of the mitigation measures recommended above. For the military barracks site, Block 40, the mitigation recommended by the Environmental Secondary Study for the block should be implemented

\(^{60}\) Secretary of the Interior's Standards for the Treatment of Historic Properties.
in a manner consistent with CEQA Guideline §15126.4. For the three other sites, Blocks 20, 8 and 24, further archaeological investigation should take place to determine whether any unique archaeological resources are present. If the results of such investigation are positive, mitigation in accordance with Public Resources Code §21083.2 and CEQA Guideline §15126.4(b)(3) should be implemented. Mitigation in accordance with these standards would reduce impacts to archaeological resources to below a level of significance.

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