

## 9 HISTORIC PRESERVATION

Historic preservation plays an important role in maintaining the community's character and identity, and enhancing the quality of the built environment to ensure the community is an attractive and desirable place for residents and visitors. The Historic Preservation Element focuses on the protection of the historical and cultural resources in the Encanto Neighborhoods, and it supports educational opportunities and incentives to highlight, maintain, and preserve historic resources.

#### GOALS

- 1. Preservation of significant historical resources.
- 2. Educational opportunities and incentives to highlight, maintain, and preserve historic resources.

TABLE 9-1: HISTORIC PRESERVATION TOP	ICS ALSO	COVERED	IN OTHER	PLAN ELEN	IENTS			
HISTORIC PRESERVATION TOPIC AREAS	LAND USE	MOBILITY	URBAN DESIGN	ECONOMIC Prosperity	PUBLIC FACILITIES AND SERVICES	RECREATION	CONSERVATION And Sustainability	ARTS AND Culture
Identification of historical and cultural resources				Х				Х
Preservation of historical and cultural resources	Х		Х	Х			X	Х

Many aspects of the Plan overlap with the Historic Preservation Element. For example, Historic Preservation is closely correlated with the Land Use, Economic Prosperity, and Arts and Culture elements. Table 9-1 shows some of the issues that may be covered in more than one element in the Plan, including Conservation and Sustainability and Urban Design. 9.1 Identification and Preservation of Historical Resources

Historical resources include buildings, structures, objects, archeological sites, districts, or landscapes possessing evidence of human activities that are generally over 45 years old, regardless of whether they have been altered or continue to be used. In addition to the federal and State laws, there are a number of local programs and laws to identify, protect, and preserve historical resources in San Diego. The City of San Diego is a Certified Local Government, which, under the provisions of the National Historic Preservation Act, is a partnership between the State of California Office of Historic Preservation, the National Park Service, and the local government. As a Certified Local Government, the City must enforce appropriate state and local laws and regulations for the designation and protection of historic properties, including adoption of a historic preservation plan or inclusion of a historic preservation element in the General Plan; establish a historic preservation review commission by local ordinance; maintain a system for the survey and inventory of historic properties; provide for public participation in the local preservation program; and satisfactorily perform responsibilities delegated to it by the state.

The City's 2008 General Plan includes a Historic Preservation Element that covers the city's history, discusses the importance and role of historic preservation in the city, and establishes policies to guide historic preservation in San Diego. The City's Zoning Code includes provisions that establish 1) the Historical Resources Board authority; 2) the Historical Resources designation process, including the nomination process, noticing and report requirements, appeals, recordation, amendments or rescission, and nomination of historical resources to state and national registers; and 3) development regulations for historical resources. The City's Land Development Manual includes the Historical Resources Guidebook, which intends to ensure consistency in the management of the City's historical resources, including identification, evaluation, preservation/mitigation and development.

San Diego has also adopted a Comprehensive Historic Preservation Plan, which includes an Inventory Element, an Incentives Element, and an Education Element. The Mills Act Agreement is active in the City and is one of several incentives available to property owners to encourage historic preservation. San Diego maintains a Register of Historical Resources, which as of 2006, contained more than 750 buildings, structures, objects, districts, cultural landscapes, and archaeological sites that have been designated by the City's Historical Resources Board.

#### **9.2 Historic Context**

The history of the people and the physical form of the Encanto Neighborhoods are closely connected, as is highlighted in the following historical narrative, based on the Southeastern San Diego Historic Context Statement completed by Page and Turnbull in 2013.

#### **Pre-history and Early San Diego History**

The development of San Diego had its start with the Mexican land grants in the area, namely Pueblo Lands and Ex-Mission Rancho de San Diego de Alcalá. These would serve as the base for all future development in the community. American settlement of San Diego be-

gan in 1850 with the subdivision of "New San Diego," and was solidified in 1867 when Alonzo Horton purchased 800 acres in downtown San Diego and began selling the lots at his real estate office. San Diego city leaders also tried to attract a railroad to further spur development in the city.

No known built resources exist from San Diego's earliest period within the Encanto Neighborhoods. However, sub-surface archaeological artifacts discovered from this period are likely to yield information about the life and culture of the early Native American, Spanish, Mexican, and early American peoples. These remains are most likely to be found along Chollas Canyon and other waterways, and many archaeological sites in the community have been documented.



Map of San Diego from 1910, showing subdivisions and city limits prior to the annexation of Encanto, which is shown on the far right. (San Diego Public Library)

#### **Suburban Farms**

In contrast with the suburban development of the western portion of the Southeastern San Diego community, Encanto and the South Chollas Valley (formerly part of Ex-Mission Rancho de San Diego de Alcalá, and not part of the San Diego pueblo lands) were decidedly rural in the late nineteenth and early twentieth centuries. Encanto was a self-sufficient town, connected to the city by rail lines but isolated from the land speculation that characterized Southeastern San Diego. Encanto was first platted in 1891, with ten-acre lots. In 1907, the Richland Realty Company purchased 1,100 acres in Encanto and re-platted it into one-half, five- and ten-acre lots, calling it Encanto Heights. The new subdivision was the first suburban stop outside of San Diego on the San Diego, Cuyamaca and Eastern Railway line.1 It was advertised for "suburban homes and small farms," ideal for fruit trees, chicken ranches, and garden-



Map from 1920 highlighitng the new city limits after annexation from Encanto.

ing. By 1910 there were five additions to Encanto Heights: Rosemont, Sunny Slope, Highdale, Del Norte, and Empire Additions. Prices for one-half-acre tracts ranged from \$50 to \$500, and the Company also had a building department in connection with Encanto Heights to build homes for new buyers.<sup>2</sup>

#### **Commercial Corridors**

By 1910, a commercial center had developed on Imperial Avenue between 63rd and 65th streets. The town's first post office was constructed in 1910, and several feed stores, a general store, a bakery, a barber, and a pool hall were all listed in the 1911 City Directories.<sup>3</sup> A portion of this historic business district remains today on Imperial Avenue, although all the existing buildings from this early period have been considerably altered.

#### **Annexation**

The Pueblo Lands formed the boundary of the City of San Diego until the early twentieth century, when the city began annexing communities that had developed in the adjacent Ex-Mission San Diego lands. The Encanto area was incorporated into the city on April 1, 1916 because residents desired San Diego's municipal water services.<sup>4</sup>

#### **New Auto-Oriented Subdivisions**

Parts of the community had already been subdivided during the real estate booms of the 1880s and the early

- 3 Fifth Amendment to the Central Imperial Redevelopment Plan EIR, 19-20.
- 4 Fifth Amendment to the Central Imperial Redevelopment Plan EIR, 19.

1900s. During the interwar period, construction in existing subdivisions grew. A few new subdivisions were recorded during this time. The automobile granted more flexibility for developers and homeowners, allowing areas farther from the city center to thrive without relying on public transportation. New subdivisions in the 1920s included Las Alturas Extensions around 1925, which extended the original 1888 "Las Alturas Villas" subdivision south to Churchward Street. In addition, Valencia Park was built in 1926 as a large subdivision with curvilinear streets at Imperial and Euclid avenues. Valencia Park was better-advertised than some of the other areas and had a large sign with free-standing letters to encourage buyers.

The street grid expanded to keep pace with these new suburban tracts. Broadway was extended into the Encanto Neighborhoods in 1927, Market Street was extended beyond Mt. Hope Cemetery and paved in 1928, and Imperial Avenue became a major thoroughfare.

#### **Garages & Automobile-Related Services**

The influence of the automobile resulted in new businesses that catered to car owners. Garages and service stations sprang up along the main commercial corridors. In the Encanto Neighborhoods, roadhouses, service stations, and garages catered to automobile travelers on Imperial Avenue, one of the main highways out to the communities in eastern San Diego County.<sup>5</sup> Personal automobile garages soon became a fixture of the new auto-focused lifestyle in the community.





Advertisement for Encanto Heights in 1910 (San Diego History Center Photo Archive) (top.) The new subdivision of Valencia Park (bottom) was built in the 1920s. (San Diego History Center Photo Archive)

<sup>2</sup> San Diego Assessor's Maps. "Encanto Advertisements," San Diego History Center Vertical Files.

<sup>5</sup> Fifth Amendment to the Central Imperial Redevelopment Plan EIR, 28.

TYPICAL EXAMPLE(S)	CHARACTER-DEFINING FEATURES
	Location in Encanto Neighborhoods
	Constructed between 1900 and 1916
	<ul> <li>Architectural style and form from this period, typically Folk National or Craftsman</li> </ul>
	Deep setback from lot line
	One to two stories
	Gable or pyramidal roof
	• Wood cladding (shingles or horizontal siding)
	• Wood sash windows (double-hung or casement)
	• Wood door (glazed or paneled)
	<ul> <li>Outbuildings such as barns, chicken coops, or utility sheds</li> </ul>



Suburban farms in the Encanto Neighborhoods in 1915 (San Diego History Center Photo Archive).

#### **Ethnic Diversity and Migration**

Beginning in the 1920s, ethnic enclaves began to form in the Encanto Neighborhoods. This is attributed primarily to the increased use of restrictive covenants in housing contracts in other neighborhoods of San Diego. Minority groups settled in Southeastern San Diego and the Encanto Neighborhoods where such restrictions were absent or were not enforced.<sup>6</sup> Other factors likely included proximity to jobs and social institutions such as churches, desire for cultural familiarity amongst others of the same culture, and international events that triggered large-scale population migrations across the country. The Encanto Neighborhoods were still a rural suburb in the 1920s and 1930s, and attracted an enclave of Japanese farmers who cultivated the rolling hills.<sup>7</sup>

#### **New Municipal Improvements**

Ocean View School was constructed between 1920 and 1940 on 47th Street. In addition, older schools were remodeled or replaced, including the Encanto and Chollas Schools. All buildings were demolished and replaced with modern schools after World War II. Holy Cross Cemetery was opened by the Catholic Diocese in 1919, on 40 acres of land north of Hilltop Drive between 44th and 46th streets. The blue-domed mausoleum was originally constructed circa 1920s, and is now very prominently located adjacent to Highway 94.<sup>8</sup>

- 7 San Diego History Center Vertical Files.
- 8 Southeast San Diego Community Plan, page 245.

<sup>6</sup> http://www.sandiegohistory.org/journal/83winter/logan.htm

**Suburbanization** 

The postwar era saw the rapid expansion of San Diego: over 2,500 new subdivisions were recorded citywide between 1940 and 1967, including several in the Encanto Neighborhoods. In 1940, a dairy at 65th and Wunderlin streets was asked to leave because it was in the middle of a built-up area. The city acquired the property, which is now the Encanto Recreation Center. Many developers constructed speculative housing in their new subdivisions, typically using identical models with a few floor plan variations. Emerald Hills Estates is the best example of this type of housing tract constructed during the postwar period in the Encanto Neighborhoods.

#### **Racial Segregation and Integration**

Restrictive zoning and discriminatory covenants in other parts of the city reinforced the segregated living



conditions that had begun in the 1920s, and Southeastern San Diego became home to a majority of San Diego's poor and non-white residents during the postwar era. Many African-Americans moved to Encanto and Valencia Park from Logan Heights in the 1950s and 1960s, taking advantage of the first opportunity they had to own homes.<sup>9</sup>

#### **Commercial Development**

In the postwar era, "car culture" pervaded Southern California, and commercial development catered to the increasing number of car owners. New property types such car washes, drive-in restaurants, and drivein movie theatres were built, and new avant-garde roadside architectural styles were developed to catch the eye of drivers. For example, the Johnson Wilshire Gas Station at 4689 Market Street (HRB site #954), built in



Settlement in the Chollas Valley in 1944 (left) and 1953 (right). The shaded areas are completely urbanized, showing the growth during this period.

TYPICAL EXAMPLE(S)	CHARACTER-DEFINING FEATURES
	<ul> <li>Location in an postwar subdivision, typically in the Chollas Valley or Encanto Neighborhoods</li> </ul>
	<ul> <li>Architectural style and form from this period, including Minimal Traditional, Streamline Moderne, and Ranch (Traditional, Contemporary or Cinderella varieties)</li> </ul>
	One story in height
	Integral garage or carport on primary façade
	Flat or shallow gable or hipped roofs
	Wood or stucco cladding



Aerial view of Emerald Hills Subdivision shortly after construction, 1957 (San Diego History Center Photo Archive).

1962, embodies the futurist Googie style with a canopy pierced by three diagonal metal supports, much like car wash designs of the period.

#### **Freeway Construction**

As the population in Southern California continued to expand after World War II, increasing traffic congestion led city engineers to create a new transportation system to move large volumes of cars quickly without having to pass through congested business districts. In San Diego, master planning for the new freeways began in the early 1950s, and the Encanto Neighborhoods were heavily affected by these plans. Large swaths of the community were razed to make way for the six and eight-lane freeways, effectively eliminating the oncefluid edges of the neighborhood. The freeways not only demolished some of the area's oldest buildings, but also displaced families and businesses.

#### Schools

Homes were built so quickly during the postwar period that schools struggled to keep up with the demand of the "baby boom." Many schools were first opened in portable buildings, and were replaced later with more permanent construction. Unlike schools from previous periods, these postwar schools still exist and in good condition today. Schools from this period include Valencia Park Elementary School (1951); Gompers Junior High School (1955); Johnson Elementary School (1957); Knox Middle School (1957); Horton Elementary School (1958); and O'Farrell Middle School (1959). In addition to the new schools, existing schools were remodeled and expanded. Schools that still retain their Mid-Century Modern designs from this period include Chollas/Mead Elementary and Encanto Elementary.

# TABLE 9-3: SOCIAL/COMMUNITY – SCHOOLS TYPICAL EXAMPLE(S) CHARACTER-DEFINING FEATURES • Use as a school • Use as a school • Location in an postwar subdivision, typically in the Chollas Valley or Encanto • Architectural style and form from this period, including International and Contemporary styles • Long, low forms, often with interconnected classroom wings • One to two stories in height • Flat or shallow gable or hipped roofs • Stucco cladding • Steel or aluminum windows • Steel or aluminum windows





Aerial view over Euclid Avenue and Highway 94,1958 (San Diego History Center Photo Archive)

#### **9.3 Designated Historical Resources**

The National Register of Historic Places (NRHP) is the nation's most comprehensive inventory of historic resources. The National Register is administered by the National Park Service and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. As of 2013, the Encanto Neighborhoods do not contain any buildings that are nationally or State-registered resources or any historic districts.

The City of San Diego maintains a Register of Historical Resources, which includes both individual resources and historic districts. Although based on California Register of Historical Resources and NRHP criteria, the City of San Diego designation criteria differ slightly from the federal and state registers. The Historical Resources Guidelines of the Land Development Manual (a supplement to the Municipal Code) states that any improvement, building, structure, sign, interior element, fixture, feature, site, place, district or object may be designated as historical by the City of San Diego Historical Resources Board. The Encanto Neighborhoods contain two properties listed in the San Diego Register of Historical Resources: the Edwin Capps Residence Site, 910 60th Street (HRB site #248) and Johnson's Wilshire Gas Station, 4689 Market Street (HRB site #954).



Johnson's Wilshire Gas Station on Market Street, built in 1962, retains distinctive characteristics of Googie architecture and is listed on the City's Register of Historical Resources.

#### **FIGURE 9-1: HISTORIC RESOURCES**



#### 9.4 Potentially Significant Historical Resources

In the next twenty years, there may be historical resources that have not yet been identified as significant that could be added to the National, State, or City Registers for Historical Resources. The following discussion of significance and integrity should be used to support future evaluation of historical resources in the Encanto Neighborhoods. It is important to note that each property is unique; therefore, significance and integrity evaluation must be conducted on a case-by-case basis.

#### Significance

A resource can be considered significant to American history, architecture, archaeology, engineering, and culture on a national, state, or local level. Perhaps the most critical feature of applying the criteria for evaluation is establishing the relationship between a property and its historic context.

Structures, sites, buildings, districts, or objects can be considered eligible for listing in the National or California registers if they are associated with events that have made a significant contribution to the broad patterns of our history; are associated with the lives of persons significant in our past; 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 distinguishable entity whose components lack individual distinction; and have yielded, or may be likely to yield, information important in prehistory or history. The City of San Diego designation criteria are based on NRHP and CRHR criteria, but differ slightly. The Historical Resources Guidelines of the Land Development Manual (a supplement to the Municipal Code) states that any improvement, building, structure, sign, interior element, fixture, feature, site, place, district or object may be designated as historical by the City of San Diego Historical Resources Board (HRB) if it meets one or more of the following criteria:

- HRB Criterion A: Exemplifies or reflects special elements of the City's, a community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping or architectural development.
- HRB Criterion B: Is identified with persons or events significant in local, state or national history.
- HRB Criterion C: Embodies distinctive characteristics of a style, type, period or method of construction or is a valuable example of the use of indigenous materials or craftsmanship.
- HRB Criterion D: Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman.
- HRB Criterion E: Is listed or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historical Preservation Office for listing on the State Register of Historical Resources.
- HRB Criterion F: Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or

WORKING DRAFT: December 5, 2013

neighborhood containing improvements which roof forms, the patter have a special character, historical interest or materials, and neighborhood

have a special character, historical interest or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

In addition, a City of San Diego Register-eligible property must retain sufficient integrity to convey its significance. Although the City's municipal code does use a 45 year threshold to review properties which may be adversely impacted by development, a property need not be 45 years of age to be eligible for listing in the City's register.

#### Integrity

In order to qualify for listing in the local, state, or national historical registers, a property must be shown to possess both significance and integrity. The concept of integrity is essential to identifying the important physical characteristics of historic resources and in evaluating adverse changes to them. Integrity is defined as "the authenticity of an historic resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance."<sup>10</sup>

For the City of San Diego Historical Register, it is understood that nearly all properties undergo change over time and thus minor alterations or changes are not uncommon; however, a building must possess enough of its original features to demonstrate why it is significant. When evaluating a property's integrity, evaluators should look closely at characteristics such as massing, roof forms, the pattern of windows and doors, cladding materials, and neighborhood surroundings.

Properties that have undergone few or no alterations and retain all aspects of integrity are more likely to be eligible for listing in state or national historic registers. These properties should also be given high priority in preservation planning efforts. Finally, it should be stressed that historic integrity and condition are not the same. Buildings with evident signs of deterioration can still retain eligibility for historic listing as long as it can be demonstrated that they retain enough characterdefining features to convey their significance.

#### Historical Resources Inventory for the Fifth Amendment to the Central Imperial Redevelopment Plan

Much of the community has not been closely evaluated for potential historic resources, but a cultural and historic resources inventory was conducted in 2006 as part of environmental review of the Fifth Amendment to the Central Imperial Redevelopment Plan. The Redevelopment Plan Area generally covers the portion of the Encanto Neighborhoods between Ocean View Boulevard and Market Street from I-805 to Euclid Avenue, as well as the Imperial Avenue corridor from Euclid to approximately 69th Street and the west side of Euclid Avenue between Market Street and SR-94.

The survey found 76 buildings with a recorded construction date prior to 1960 or an estimated age of over 45 years in Central Imperial Redevelopment project area. Buildings were evaluated for potential historic register eligibility. Most of the buildings are located along Imperial Avenue, especially clustered between





In order to qualify for listing in the local, state, or national historical registers, a property must be shown to possess both significance and integrity. Properties shown here are for example only.

<sup>10</sup> California Office of Historic Preservation, Technical Assistant Series No. 7, How to Nominate a Resource to the California Register of Historic Resources (Sacramento, CA: California Office of State Publishing, 4 September 2001): 11.





Buildings along Imperial Avenue (top) and the former Emerald Hills Golf Course (bottom) may be eligible for historic listing. 63rd and 66th streets, the focal point of the Encanto community from the 1910s into the late 1950s. Many of these may be eligible for listing on the City Register as contributing elements to a proposed Encanto Commercial Historic District. Some, notably 6365 Imperial Avenue, the Art Deco-style red brick building that housed the Encanto Post Office in the 1920s, and 6493 Imperial Avenue, a Mission-style commercial building dating from the 1920s, may also be eligible for listing as an individual resource on the basis of architectural style.<sup>11</sup> Three additional buildings in the Lincoln Park neighborhood were also identified as potentially eligible for individual listing.

### Other Potentially Significant Historical Resources

Other potentially eligible sites include the former Emerald Hills Golf Course and Country Club located at 1601 Kelton Avenue. The clubhouse was contructed in 1939 ad operated by Art Cloninger, a widely know restaurant operator, and was intended to take the place of another local dine and dance rendezvous. A potentially historic property type associated with one of the significant themes of the development period is the suburban farms, which is unique to the Encanto Neighborhoods area. Contructed between 1900 and 1916, the properties can be associated with the earliest development and sale of land in Encanto Neighborhoods. These units were the center of suburban farms and are presently located throughout the hills of the community.

#### **Policies**

- **P-HP-1:** Conduct a Historic Resources Survey to identify architecturally significant buildings or additional important historic districts.
- **P-HP-2:** Conduct additional research and field work to discover potentially significant buildings and to evaluate their eligibility for listing in the City of San Diego Register of Historical Resources.
- **P-HP-3:** Maintain an accessible inventory of designated and potential historic resources.
- **P-HP-4:** Promote community education and awareness of the significance of the Encanto Neighborhoods' potential and listed historic resources.
- P-HP-5: Provide long term assurance that potential and listed historic resources will be used, maintained, and rehabilitated in conformance with Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Preserving Historic Buildings (Secretary's Standards).
- **P-HP-6:** Encourage alternatives to demolition such as architecturally-compatible rehabilitation, adaptive re-use, new construction, and relocation.
- **P-HP-7:** Require that no permit shall be issued for alteration or demolition of properties identified in the City of San Diego Register of Historical Resources as potential historic resources until alternatives to demolition have been duly considered.

<sup>11</sup> ASM Affiliates, Inc. for Southeastern Economic Development Corporation. Fifth Amendment to the Central Imperial Redevelopment Plan EIR, Appendix E1: Cultural Resources. April 2006.

#### 9.5 Archaeological Resources

Archaeological resources include prehistoric and historic locations or sites where human actions have resulted in detectable changes to the area. This can include changes in the soil, as well as the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both. Historic archaeological resources are those dating after European contact. These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures. A report on the archeological resources in the communities of Southeastern San Diego and the Encanto Neighborhoods was completed in 2013 by AECOM and is available to view in its entirety at the City of San Diego.

In these two communities, 32 cultural resources have been recorded. The 13 prehistoric resources include two temporary camps; two shell scatters; two shell and lithic scatters; one lithic scatter; one shell, lithic, and groundstone scatter; one shell and lithic scatter with associated midden; one habitation site; the ethnographic village of Las Choyas; and two isolated finds. The 18 historic resources include 13 historic debris deposits, two historic foundations with associated features, two historic debris deposits with associated features, and one historic residence. One multi-component site is also present, consisting of two historic loci and two prehistoric loci. Numerous previously recorded and newly identified sites and/or features have been observed in a buried context during ground-disturbing construction and infrastructure installation, or maintenance activities.

There are substantial pockets of land that remain undeveloped in the Encanto Neighborhoods, located primarily in canyon areas and designated parks. The ethnographic village of Las Choyas has been identified archaeologically and ethnographically within the community and has been previously identified as an area of concern to the local Native American community. Water courses such as Chollas Creek, Imperial Creek, and South Chollas Creek were major transportation corridors and ecological resources used during both prehistoric and historic periods. Given these factors, these areas have a high level of cultural sensitivity. Because cultural resources have also been observed during ground-disturbing activities throughout the community, and because the plan area is crossed by multiple high-potential water courses, the remainder of the community plan area is considered to have a moderate level of sensitivity for buried archaeological resources.

Participation of local Native American tribes is crucial to the protection of cultural resources. Native American participation would be required for all levels of future investigations in the Encanto Neighborhoods. Areas that have not been developed should be surveyed prior to any ground- disturbing activities. In areas that have been developed, ground-disturbing activities should be monitored.

#### **Policies**

- **P-HP-8:** Conduct project specific Native American consultation early in the development review process to ensure adequate data recovery and mitigation for adverse impacts to significant archaeological and Native American sites. Refer potentially significant historical and cultural resources to the Historical Resources Board for designation.
- **P-HP-9:** Allow concerned Native American parties an opportunity to comment on or participate in any treatment plan for any sites with cultural and religious significance to the Native American community.
- **P-HP-10:** Recommend that concerned parties seek to avoid direct and indirect impacts to the site(s) as the primary mitigation alternative in the event that Native American burials are anticipated or inadvertently discovered during controlled archaeological excavations or any phase of construction. Proceed according to applicable laws and in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA; 43 CFR 10), as appropriate, as well as according to any agency-specific rules and procedures, concerning the treatment of sites containing human remains, funerary objects, sacred objects or objects of cultural patrimony.
- **P-HP-11:** Recommend that if human remains are uncovered, no further disturbance of the site shall occur until the County Coroner has made the necessary finds as to origin and disposition of the remains.