

**CULTURAL RESOURCES MANAGEMENT ELEMENT**

## **Cultural Resources Management**

No city can hope to understand its present or to forecast its future if it fails to recognize its past. For by tracing the past, a city can gain a clear sense of the process by which it achieved its present form and substance; and, even more importantly, how it is likely to continue to evolve. For these reasons, efforts directed to identifying and preserving San Diego's historic and archaeological resources - with their inherent ability to evoke the past - are most advisably pursued.

Cultural resources are physical features, both natural and man-made, associated with human activity. These may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, street furniture, signs, and planted materials; in short, almost anything that connotes man's past presence. For purposes of this element, a distinction is made between "archaeological" and "historic" sites. This distinction is based on the authoritative work of the State Archeological, Paleontological and Historical Task Force, appointed by former Governor Ronald Reagan in 1971, whose work culminated in the publication "The Status of California's Heritage: A report to the Governor and Legislature of California," by W.R. Green, et. al., September 1, 1973.

The California Task Force used the term "archeological site" to mean any mound, midden, burial ground, mine, trail, rock art, or other location containing evidence of human activities which took place before 1750 A.D. An "historic site" is any structure, place, or feature which is or may be significant in the state's past (1542 A.D.) history, architecture, or culture.

This element interrelates in varying measures with most of the other General Plan elements. It complements closely the Urban Design Element. Both are concerned with utilizing local physical features to strengthen the City's identity and its constituent communities. In addition the Cultural Resources Management Element's essential ingredients - cultural resources - often function as housing units, industrial or commercial establishments, recreational facilities, or other viable land uses. Further, the existence of cultural resources may be a compelling factor in the designation of open spaces.

It must be noted that the nature of the interrelationship with seismic safety may largely be one of conflict. This is because many older buildings are regarded as structurally hazardous, and are therefore prime candidates for abatement programs. Where such conflict situations arise, they should be resolved on a case by case basis - with full consideration given all competing values and objectives.

## **FINDINGS**

### **General**

For the citizens of San Diego to derive maximum educational and aesthetic benefit from our cultural resources, sites must be adequately protected and their surrounding environments preserved. This requires a broad application of the principles of cultural resources management as early as possible in the planning process of both public and private projects and the

establishment of mechanisms to ensure adherence to the program. Such measures must not, however, unduly retard or halt much-needed development and improvement of our urban landscape. A comprehensive cultural resource management program can permit preservation while at the same time allocating fairly the costs and burdens of preservation.

The alarming rate of historical and archeological site destruction by human agency, both public and private, has been discussed and documented by many authorities.

"Although extremely destructive, urbanism is not the only factor adversely affecting archeological resources. Statewide, residential and industrial developments, highways, water projects, and vandalism are all major contributors to archaeological site removal. Other detrimental forces include agriculture, logging, recreation developments, military activities, off-road vehicles, and natural erosion. . . " <sup>1</sup>

The need for increased public efforts to slow the rate of destruction of cultural resources is evident.

"In the past, responsibility for preserving historic artifacts, documents, and features, has been largely assumed by private organization and individuals. Certainly this laudable effort should be encouraged. But coordination is vital if the limited funds made available for this purpose are to be used wisely. Because of the lack of defined objectives, criteria, and priorities, funds have sometimes been expended on projects of less than prime importance while those that are critical to meaningful interpretation of history have been lost."

"Historic structures are the most obvious and the most vulnerable of our historic resources. Historic documents and records can be preserved, filed, photographed, copied (although they can just as readily be lost); many art objects, artifacts and coins can be moved to safer quarters; sites, though they may be covered by later construction, can nevertheless be marked. Buildings, however, once gone are gone; approximate reconstruction in the original style and manner-if that can be determined--is rarely satisfactory." <sup>2</sup>

## **Deficiencies**

### **Comprehensive Inventory of Cultural Resources**

**Historic:** Previous surveys to identify historic resources have been limited in scope to particular areas of the City and/or to particular features. Consequently, a comprehensive citywide inventory of historic resources has yet to be accomplished.

In the absence of such an inventory, it may be presumed that many valuable historical resources have been irretrievably lost due to ignorance of their existence or value. Moreover, it can probably be ventured that losses will continue to occur until such time as adequate information becomes available.

Apart from deterring losses of value, a comprehensive inventory could be expected to yield other worthy benefits. For example, by indicating the magnitude of the City's cultural resources, an

inventory would permit a dimensioning of the total preservation task and thereby facilitate decision making as to how to proceed.

**Archaeological:** There has never been a systematic field survey of the City's archaeological resources. Known resource sites have been recorded at a number of institutions both inside and outside the San Diego area, making access to the data difficult. Many of the locally recorded sites have been destroyed by development while unrecorded sites also are lost due to our ignorance.

A comprehensive field survey and inventory program is needed to, 1) consolidate known San Diego sites recorded here and elsewhere, 2) verify the status of known sites by field check and 3) identify areas which contain prehistoric resources not previously known.

Such a program would permit a ranking of sites according to their significance, reducing the collection of redundant data and providing a knowledgeable basis for preservation and protection efforts.

### **Cultural Resources Management Plan and Program**

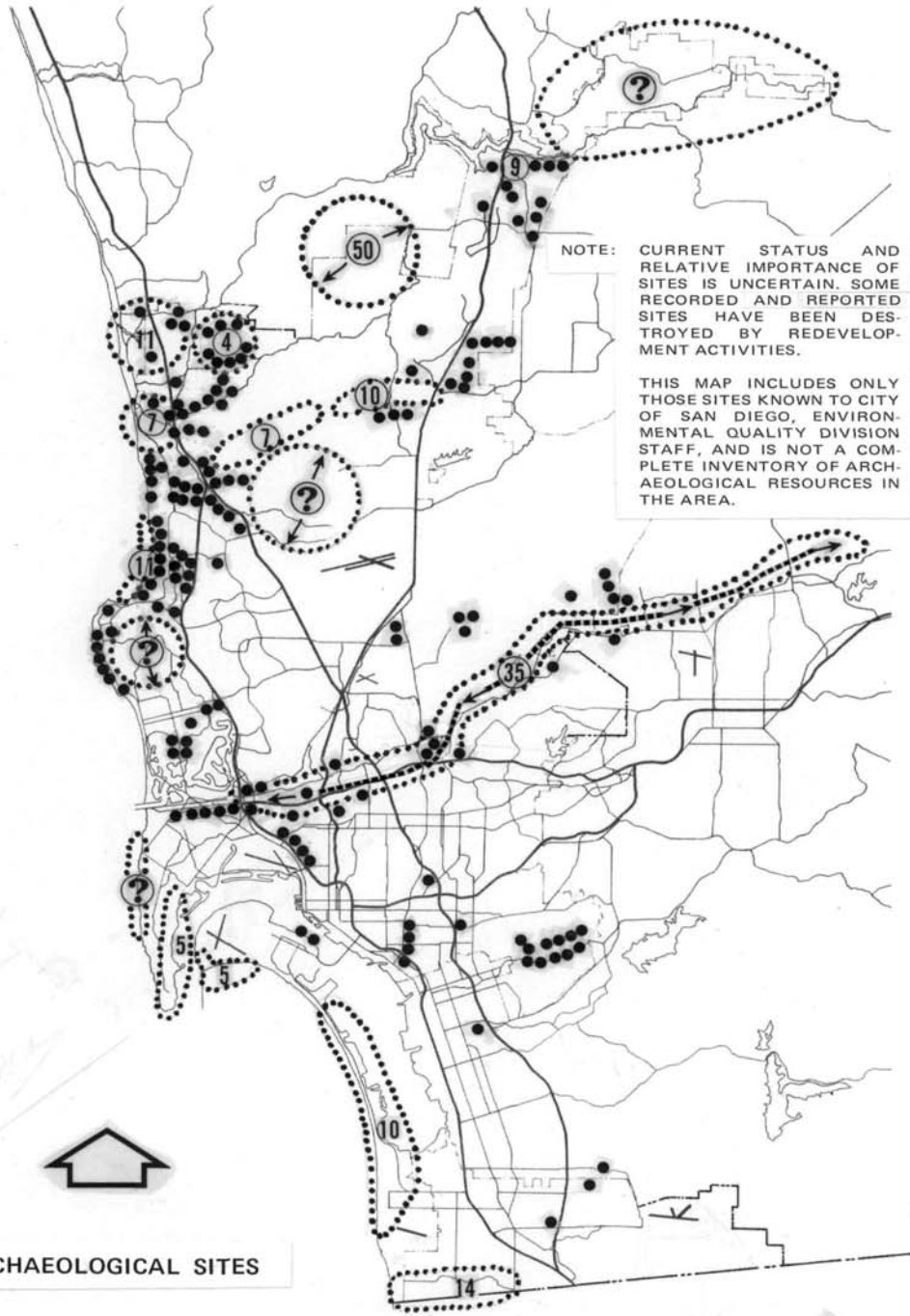
**Historic:** As part of the rising general concern expressed locally in recent years over deterioration of the environment, a heightened interest has attached to the preservation of historic resources. As a result, various private and semi-private organizations have become active in historic preservation work and have recorded a number of successes. However, that which remains to be done clearly exceeds the capabilities of these organizations. Therefore, requests for assistance directed to the City government have steadily mounted.

At present, the City has no historic preservation plan and program against which to systematically evaluate these increasing requests. Nor are official guidelines available to help decide what form of preservation is most appropriate in given situations.

It should be apparent that a well-conceived plan and program for the preservation of historic resources is very much needed.

Building upon the comprehensive inventory, such a plan and program could define with precision the categories of historic resources and the kinds of preservation techniques applicable to each; set forth specific goals and objectives; identify and explore possible funding sources; formulate criteria to assist the assignment of acquisition priorities; and project the pace at which implementation should desirably proceed.

**Archaeological:** Although recognition of the importance of our local prehistoric resources has been articulated through the environmental report process there has been no local policy or procedure by which to guide preservation efforts when they are needed. Local museums, universities and interested groups are limited by donations of funds, time, and materials in their ability to provide a continuing monitoring effort over our local resources.



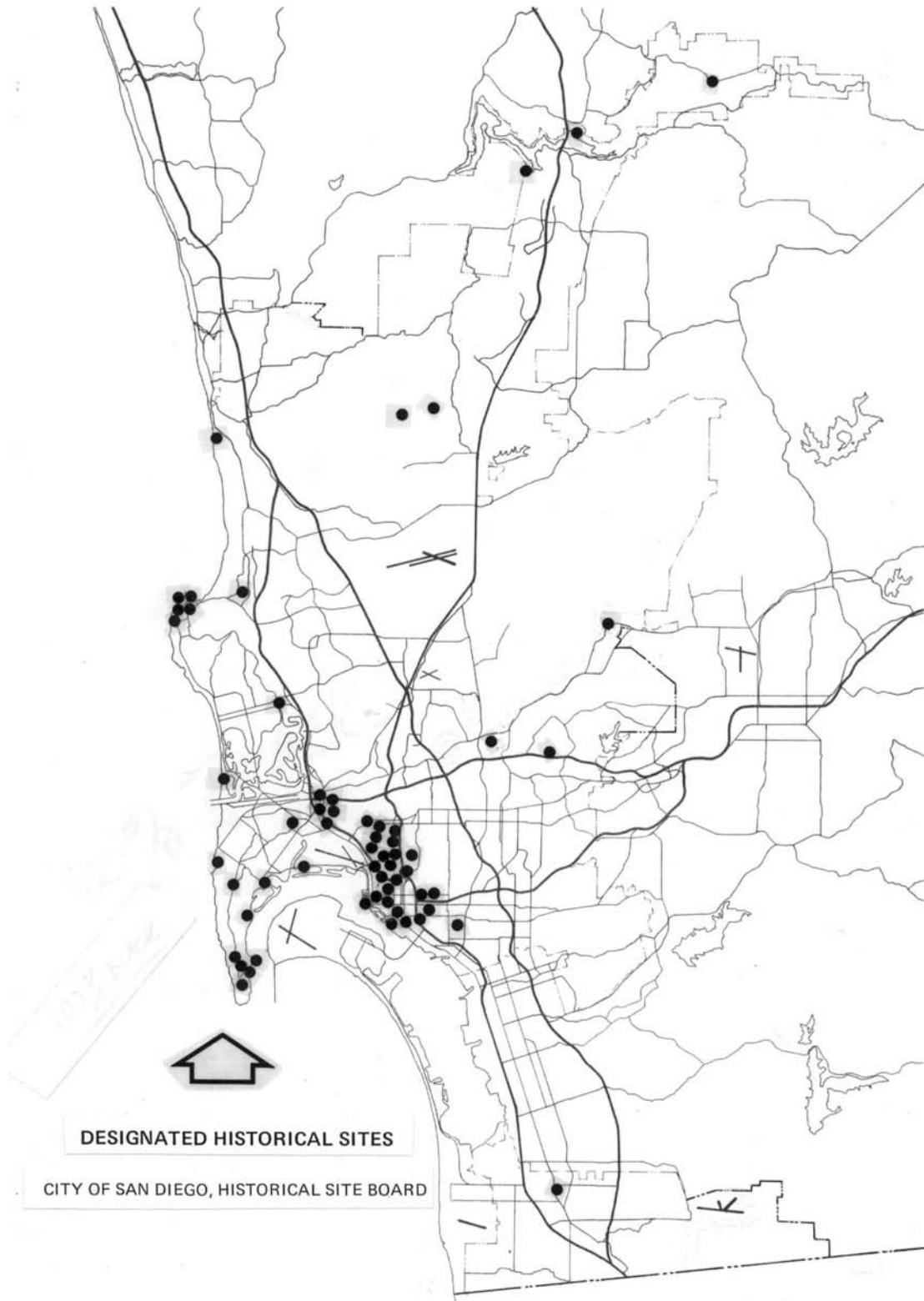
NOTE: CURRENT STATUS AND RELATIVE IMPORTANCE OF SITES IS UNCERTAIN. SOME RECORDED AND REPORTED SITES HAVE BEEN DESTROYED BY REDEVELOPMENT ACTIVITIES.

THIS MAP INCLUDES ONLY THOSE SITES KNOWN TO CITY OF SAN DIEGO, ENVIRONMENTAL QUALITY DIVISION STAFF, AND IS NOT A COMPLETE INVENTORY OF ARCHAEOLOGICAL RESOURCES IN THE AREA.

**ARCHAEOLOGICAL SITES**

- APPROXIMATE LOCATION OF RECORDED AND/OR REPORTED ARCHAEOLOGICAL SITES
- (50) APPROXIMATE NUMBER AND GENERAL LOCATION OF RECORDED AND/OR REPORTED ARCHAEOLOGICAL SITES
- (?) GENERAL LOCATION OF REPORTED ARCHAEOLOGICAL SITES, NUMBER OF INDIVIDUAL SITES UNCERTAIN

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An overall plan and program would provide a framework for standardization of procedures for surveys and excavations, qualifications of professionals, reporting, collection and storage of recovered materials and information, contact with Native Americans when necessary and site protection mechanisms. Beyond this, the plan and program should extend to public education in the value of prehistoric resources and the importance of protection from vandalism and random collection by amateurs.

All planning levels within the City should incorporate a component addressing both historic and prehistoric cultural resources which may be encountered in their activities.

### **Strengthened Organizational Structure**

The only City agency formally charged with responsibilities for historic preservation is the Historical Site Board. The board is explicitly mandated by ordinance to designate "sites, buildings, structures, or marks" of historical significance; to advise City bodies and officials; to explore methods of preservation; and to recommend historic and aesthetic zones and standards. The board is proscribed from holding monies or properties as an appointive body, the board has no regular full-time staff and little funding. Therefore, it is difficult to adequately organize and promote historic preservation efforts in San Diego, and the board has generally limited its activities to designating sites and serving in an advisory capacity.

While the mandating ordinance establishes adequate authority for the board to perform its prescribed duties, it is not sufficient in scope to encompass the full task and associated responsibilities of cultural resources management. Thus, as an ordinance designed for an advisory rather than a decision making body, it does not encourage the initiation of action measures. Neither does it encourage examination of the economic and social impacts of historic preservation, nor does it designate responsibility for archaeological resources. A strengthened organizational framework with necessary staff personnel is called for if cultural resource management activities are to be conducted in an appropriately comprehensive manner.

### **Implementation**

#### **Available Measures**

#### **Historic-Archaeological**

- **Historical Site Board**

Designates buildings, sites, landmarks and districts deemed "historically significant."

Can delay demolition up to one year with the consent of Council in order to find alternative means for permanent preservation.

Drawbacks: The board has no authority to seek public funding. Demolition can eventually occur regardless of the site's significance. The board has no overall plan for determining the remaining inventory of significant sites. Designation is often conducted on a random basis.

No professional staff input is available regarding the planning or architectural merits of sites under consideration. The work of the board is often poorly coordinated with the goals and objectives of adopted community plans. Status of existing sites is poorly monitored. Liaison between the board and permit authorities is unclear, tending to cause delays in granting of permits. Public information is not generally available describing the function of board and its implementing authority. The board's authority does not explicitly include prehistoric sites or objects. The board does not include specialists in archaeology.

- **Building Code Amendment**

Designated sites may receive special treatment under the building code when changes in use (most often from residential to commercial) are proposed.

Drawbacks: Provisions of the Historic Building Code have limited applicability to masonry structures found most frequently in Centre City.

Building permits are not reviewed by the California Environmental Quality Act (CEQA) process therefore some projects requiring only a building permit may destroy archaeological resources without opportunity for a survey and salvage.

Building permits on undeveloped land not previously reviewed through discretionary approvals should undergo archaeological investigation. Early notice for this requirement could be made via the rezone, and parcel map approval process. Under these conditions delay of building permit approval would be very rare.

- **Planned Districts**

Allows the development and administration of specific design and land use controls sensitive to the existing or desired character of an area.

Drawbacks: Extensive staff and processing time required to implement. Would not be useful in protection of archaeological resources.

- **Tax Abatement**

Mills Act presently allows "present use" assessment. Federal Tax Reform Act of '76 contains provisions relating to historic structures.

Drawbacks: Mills Act requirements limit, for practical purposes, application to non-profit organizations.

Federal guidelines still in initial stage of development site must be on national register. Existing laws should be amended to include property containing prehistoric resources.



- **Redevelopment Law (Tax Increment)**

Allows use of tax increment to intervene by means of subsidy in redevelopment efforts. Drawbacks: Present priorities do not place preservation highly. Not applicable to preservation of prehistoric sites.

- **Community Planning**

May call out areas of historic or other interest worthy of preservation and recommend implementation measures.

Drawbacks: Previous plans have not included adequate survey evidence to justify recommendations. Implementation measures insufficient. Lack of surveys and inventory reduce opportunities for management guidelines.

- **Conditional Use Permit**

Allows property owner to establish commercial uses within designated historic sites. Can be conditioned by the Planning Commission, Zoning Administrator and Council to require adequate mitigation of impacts to prehistoric resources.

- **Community Development Block Grant**

Presently a revolving fund has been established to provide low interest "code-enforcement" type loans in designated areas. Property owners may borrow funds to upgrade homes. Drawbacks: As presently structured, repairs must be "minimum necessary" and thus have a tendency to downgrade living conditions, working against urban conservation. Not applicable to preservation of prehistoric resources.

- **Tentative Subdivision Maps, Grading Permits and Variances**

Can be conditioned by the City Engineer, Zoning Administrator, Subdivision Review Board and Planning Commission to require adequate mitigation of impacts to prehistoric resources. These mitigations could be in the form of surveys, collection of resources, excavation and salvage of a small portion of site, and other means of protecting the resource from development.

- **Easement**

An easement for purposes of preserving prehistoric and historic resources can be dedicated to the City by a property owner who finds such resources on his land through the environmental review process.

An easement could limit the use of such land in order to prevent disturbance of the resources; restrictions could prevent building construction, fencing, landscaping, irrigation,

signing, lighting and other disturbances and could limit public access to the site for scholarly purposes only.

- **Deed Restrictions**

Often used by condominium and cluster development projects, deed restrictions permit non-governmental regulations of architectural style, use of antennas, signs and other activities. Deed restrictions can therefore be used to protect prehistoric and historic resources in the ground or surface features such as grinding stations or pictographs and petroglyphs.

Drawbacks: Because these restrictions are enforced through a private group their effectiveness is dependent on the commitment of the group and private legal efforts when necessary.

- **Demolition Permit**

Permits for destruction of a building or structure are granted to contractors licensed by the state who file a surety bond with the City. Regulations include the requirements that remaining excavations or depressions be restored to the level of the adjacent ground. The Historical Site Board can delay demolition of structures having historic significance.

Drawback: Demolition of structures over 50 years old may adversely affect archaeological resources underneath the structures which were not damaged due to building construction. Archaeological review of demolition permits for structures 50 years or older in 1970 should take place before, during, and/or after the demolition, that is, the review would not delay demolition.

- **Acquisition**

Public acquisition of historic or prehistoric resources, either by private or public funds, for operation by a qualified organization under contractual agreement with the City. Precedent for such action has already been established in the City's acquisition of the Villa Montezuma and the Marston House.

## **Additional Measures**

### Historic

Rather obviously, public agencies cannot afford to preserve all endangered historic resources by outright purchase. Therefore, wherever conditions permit, the public sector should primarily concentrate on: (1) prohibiting destruction of those resources deemed to warrant preservation; and (2) establishing mechanisms whereby such resources can be retained under private ownership.

The investigation of additional implementing mechanisms is highly desirable. In this regard, the potential advantages and disadvantages linked to the use of such instrumentalities as

development rights transfer, scenic and facade easements, City tax rebates, density bonuses, and leaseback arrangements need to be thoroughly studied.

The establishment of revolving funding mechanisms to provide vital start-up capital for adaptive re-use projects is also a priority. Working with the financial community, the City can help to restore investor confidence in older neighborhoods and commercial districts. Capital improvement programs should be balanced to reflect commitment to central residential and business community areas.

### Archaeological

There are currently no City mechanisms available for protection of archaeological sites through the Historical Site Board Ordinance. The California Environmental Quality Act provides that a public or private project would have a significant effect if it would "disrupt or alter an archaeological site over 200 years old. . . except a part of a scientific study of the site." <sup>3-4</sup>

In order to make this determination the City of San Diego, Planning Department's Environmental Quality Division would require an archaeological survey and report and would encourage the applicant to mitigate any impact which the project might have on the prehistoric resource. These mitigations would be voluntarily carried out by the developer or could be made a condition of approval by the approval authority.

The local police authority is bound to uphold the State Penal Code which includes a provision that any person, not the owner thereof, may not deface, destroy or otherwise degrade an object of archaeological or historical value whether on public or private land. <sup>5</sup> For sites listed on the National Register<sup>6</sup> or California State Historical Landmarks Register <sup>7</sup> matching funding may be available for preservation efforts.

### GOALS

- PRESERVATION OF SAN DIEGO'S RICH HISTORICAL AND PREHISTORIC TRADITION SO THAT IT MAY BECOME PART OF THE CONSCIOUSNESS OF THE PRESENT AND FUTURE GENERATIONS.
- EFFECTUATION OF A CULTURAL RESOURCES MANAGEMENT PROGRAM THAT MAXIMIZES, INSOFAR AS PRACTICABLE, THE LIVING UTILITY OF HISTORIC RESOURCES.
- CONSERVE NOT ONLY STRUCTURES OF OUTSTANDING HISTORIC AND ARCHITECTURAL MERIT, BUT ALSO THOSE STRUCTURES WHICH CONTRIBUTE TO THE ECONOMIC AND SOCIAL WELLBEING OF THE CITY.
- ENACT LOCAL ORDINANCES WHICH WOULD ENSURE EFFECTIVE PRESERVATION, PROTECTION AND MANAGEMENT OF SIGNIFICANT CULTURAL RESOURCES AND WOULD PLACE SUCH RESOURCES IN THE PUBLIC DOMAIN.

- CONSERVE IN THEIR ENTIRETY THE LARGEST AND MOST UNIQUE PREHISTORIC SITES FOUND WITHIN THE CITY TO BE HELD FOR INVESTIGATION WITH MORE SOPHISTICATED TECHNIQUES DEVELOPED AT SOME FUTURE TIME.
- PRESERVATION OF HISTORIC RESOURCES IN NUMBER AND TYPE SO AS TO SUCCESSFULLY EVOKE THE DISTINCTIVE CHARACTER OF ALL SIGNIFICANT STAGES OF SAN DIEGO'S HISTORY.

## **GUIDELINES AND STANDARDS**

### **Identification Criteria**

#### Historic

First order criteria: it is useful to distinguish between two levels of criteria employed in the identification of historic resources. "First order criteria" are those which, if met, are sufficient in themselves to establish historical significance.

These criteria are embodied in the questions that follow and reflect a broad definition of historical, architectural, and cultural importance; a perspective of local, rather than state or national significance; and the belief that all aspects of our history are potentially of equal importance.

Does the resource:

- offer tangible association with significant personages, groups, ideas, events, or evolutionary historical changes?
- illustrate particularly well an important aspect of a given period in time, or is it one of a few remaining examples of its type illustrative of that period?
- represent an archetype of a distinctive construction method, structural technique, or design treatment?
- exhibit distinguishing qualities of construction, workmanship, or use of materials?
- assist in illuminating the evolution of San Diego's physical or economic development?
- play an important role as an element of a larger significant group or resources?
- provide particularly pleasing characteristics, qualities, or symbolic significance impossible or unlikely to be replaced? Or, in the case of platings, impossible to renew within a reasonable period of time?

Is the resource:

- a site which has contributed or may reasonably be expected to contribute to scholarly research by providing dates which may affect theories, concepts, or ideas relating to past cultures or activities?
- of a distinctive cultural or aesthetic character which makes an important contribution to the quality and diversity of urban life in San Diego, and whose loss would be detrimental to the fabric of the urban environment?
- one whose preservation would assist in a more balanced emphasis in the portrayal of past human activities?
- one which will significantly increase public interest in one or more aspects of San Diego's history?

Second order criteria: Second order criteria are those which while insufficient in themselves to denote historical significance, add measurably more status to a resource already so denoted through the application of first order criteria. Such a resource should be regarded as possessing far greater consequence if, in addition, it:

- serves as a significant social symbol or landmark; houses or facilitates significant social functions impossible or unlikely to be replaced; or plays an important role in a larger pattern of significant social interaction impossible or unlikely to be replaced;
- is a visually prominent, unique or familiar feature due to its physical location or form;
- contains a predominance of material or other physical remains which are original or which have replaced the original in the normal course of use and which have since acquired their own integrity; constitutes remains on their original site or on a site which has acquired meaning an association in its own right or conveys a significant sense of the original environmental context.

Archaeological

**First order criteria for archaeological sites - site importance in terms of the local area and local research problems**

- size of occupational area is large in terms of surface area or possesses large quantities of resources;
- presence of single or multiple occupations at single location representing different cultural occupations either during the same time or during successive time periods;
- relative depth of the occupational area in terms of the deposition of human cultural evidence below the ground surface, deeper sites usually contain more information than shallow or surface sites;

- representative of an age or occupational period formerly unknown or in need of greater definition;
- sites demonstrating wholeness in the degree of preservation of the resources and their ecological setting which would provide the greatest opportunity for scientific research and site preservation;
- unique, rare or unusual sites of any size, depth, age or setting;
- sites with high potential for scientific research and resource analysis;
- sites which can provide diagnostic information which would provide characteristics for a whole class of artifacts, occupational periods, activities or locations;
- sites which contain examples of a variety of human activities within one occupational area;
- sites meeting the criteria of eligibility for state or national register status;

### **Second order criteria**

- sites possessing cultural heritage value to local inhabitants or special interest groups;
- sites contributing to long-range research questions such as the population of North America, the relationship between cultural groups in the American southwest and Mexico, and others;
- sites contributing to non-archaeological fields such as ecology, plant domestication, zoology, geology, hydrology, American history and others;
- sites contributing to public education and tourism which are vehicles for the dissemination of information about the past.

### **Implementation Guidelines**

The following sets of principles should guide the carrying out of cultural resource management activities.

- The process of change is a continuous and positive reality. As a rule, efforts to preserve cultural resources should not attempt either to arrest the flow of time completely or to restore them to their original form and appearance. Rather, the evolutionary nature of past development should be recognized as valid and the possibility of future change be provided for within the implementative framework.
- Adaptive uses other than museums should be encouraged. The implicit biases which have operated in the past to exclude particular land uses and, therefore, particular ethnic and economic groups from occupying historic resources have been counterproductive. All land

- use activities are potentially compatible with preservation. In many cases, a resource is effectively preserved by a continuation of its present use.
- In general, it is better to preserve than to repair; better to repair than to restore; and better to restore than to reconstruct. Removal of historic resources from their original or long time locations seriously detracts from their significance. Features should be retained "on site" wherever possible.
- Depending on individual circumstances and the method of preservation employed, historic preservation can have negative as well as positive effects. Such negative effects may include the elimination of social and economic options, particularly lower priced housing and services, that are often facilitated by older buildings. There may also be involved the preemption of land and, to some extent, the limitation of new creative effort and development. All these factors should be taken into consideration and a fair balance determined before the method of preservation is settled upon.
- Awareness of the condition that archaeological resource preservation may not always be compatible with all uses primarily because the natural setting of the site is an integral part of the resource and also because intensive human activity near such resources can be counterproductive to preservation efforts.
- For archaeological resources it is better to preserve than to mitigate impacts. Mitigation is improved if a 15 percent or larger sample is excavated; however, holding a site out of development without excavation would be preferable as a long-term strategy. In unusual cases prehistoric sites could coexist with other uses which would have a minimum disturbance impact. When excavation is undertaken it should be done by qualified professionals, data should be stored with an appropriate institution, all materials and data should be fully analyzed and compiled in a report of publishable quality.

## **RECOMMENDATIONS**

- Expand the role of the Historical Site Board or establish a new Cultural Resources Management Commission with adequate authority, staffing (an office of Urban Conservation) and funding to undertake functions beyond those now satisfactorily performed by the Historical Site Board.
- Utilize an existing organization or sponsor the establishment of a private, nonprofit, organization for the purpose of acquiring and preserving prehistoric sites.
- Prepare a comprehensive citywide inventory of cultural resources including both prehistoric sites and man-made resources.
- Prepare a comprehensive plan and program by both public and private sectors to accommodate urban growth while preserving structures and complexes of importance to urban identity.

- Support the development of legislation on all governmental levels in the cultural resource management field.
- Develop a program of national register designation for prehistoric sites and historic districts.
- Encourage the participation of both public and private sectors to share the responsibility of developing regulations, incentives, and increased awareness of the benefits of urban conservation.
- Create an archive for the City and county of San Diego wherein all excavated collections, records and reports could be centrally located.
- Continue and strengthen efforts to properly coordinate cultural resource management activities with other agencies and private organizations.
- Explore potential sources of funds, federal, state and local, for the acquisition, preservation and management of cultural resources.
- Develop a method whereby both the public and private sectors equally share the costs of conserving cultural resources.
- Develop public policy to protect prehistoric sites from the encroachment of expanding land uses.

## FOOTNOTES

1. The Status of California's Heritage: A Report to the Governor and Legislature of California, by W.R. Green, et al., September 1973.
2. "The Status of California's Heritage," op. cit.
3. CEQA, State Guidelines, appendix G, Section j
4. CEQA, 2100 1(c)
5. Cal Penal Code Title 14, Part 1, Section 622- ½
6. Historic Sites Act 1935
7. Historic Preservation Act 1966