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I. EXECUTIVE SUMMARY

This Historical Resource Analysis (Technical) Report (HRAR) was prepared to analyze the historical resource status of the Tenant Activity Building constructed in 1943 on Lot 5 of Block 54 of Unit No. 1 of the Linda Vista Subdivision. The building was constructed for use as the Linda Vista Housing Project Tenant Activity Building. Today the building is addressed as 6907 Linda Vista Road.

The purpose of this report is to assist the Redevelopment Agency of the City of San Diego and the City of San Diego City Planning & Community Investment Department, as well as future project design professionals, in the decision-making process and historic preservation requirements related to current and future proposed projects at the 6907 Linda Vista Road property. A historical overview, current description, and related CEQA historical resource regulatory interpretation are included on the following pages.

The building is not currently designated by the City of San Diego and the building is not listed on the California Register of Historical Resources or the National Register of Historic Places.

The Tenant Activity Building appears to be individually eligible for inclusion on the City of San Diego Historical Resource Register, the California Register of Historical Resources, and the National Register of Historic Places for an association with wartime neighborhood development patterns in San Diego from 1943 through 1953 as the principal community center for the federally constructed WWII-era Linda Vista neighborhood, and for its embodiment of WWII-era American Military Architecture and the 800 Series Field House property type. Rapid construction of wartime housing often left residents without a place to congregate, and as a result, multi-use community centers such as the Tenant Activity Building were constructed under federal funds to meet this void. As a part of the Linda Vista Housing Project, the Tenant Activity Building was constructed in August 1943 and served as the central recreational facility in Linda Vista for all ages and organizations, and hosted a variety of activities from 1943 when it was constructed through 1953 when the federal government sold the building to private ownership. The Tenant Activity Building is the only extant building within the community’s commercial and civic block that dates to the era of federal planning and construction activities in Linda Vista. The Tenant Activity Building represents historic development patterns and planning and design methods in the WWII-era of San Diego’s history, and as such the building appears to be eligible for inclusion on the City of San Diego Historical Resources Register, the California Register of Historical Resources, and the National Register of Historic Places respectively.

As the principal community center for the federally constructed WWII-era Linda Vista neighborhood, and for its embodiment of WWII-era American Military Architecture and the 800 Series Field House property type, with its full-span glue laminated timber truss arches, barrel roof form, and single story surrounding wings the Tenant Activity Building has been found eligible for inclusion on the Local, California, and National Registers under Criterion 1 / 1 / A and 3 / 3 / C respectively. Because the building has been identified as eligible for designation, the building appears to meet the definition of an historical resource pursuant to §15064.5 of the CEQA Guidelines and of an historic property pursuant to Section 106 of the National Historic Preservation Act.

It is recommended that future projects proposed at the building include adaptive reuse of all or a majority of the building, and that all work proposed conform to 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 Standards and Guidelines for Rehabilitation.

Should removal, demolition, or other material changes be proposed to the building it is recommended that an impacts analysis be prepared prior to approval of projects in order to determine whether the building would retain integrity and significance after a building is removed, and to determine whether any impacts identified could be mitigated to a less-than-significant level of impact to address regulatory review requirements.
II. INTRODUCTION
This Historical Resource Analysis (Technical) Report (HRAR) was prepared to analyze the historical resource status of the Tenant Activity Building constructed in 1943 on Lot 5 of Block 54 of Unit No. 1 of the Linda Vista Subdivision. The building was constructed for use as the Linda Vista Housing Project Tenant Activity Building. Today the building is addressed as 6907 Linda Vista Road.

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Methodological Approach
The methodological approach undertaken for this HRAR consisted of three major tasks - a site visit, archival research, and technical analysis.

Urbana Principal Wendy L. Tinsley Becker, AICP, Malia Bassett, Junior Planner, and Heather Crane, Associate AIA, Junior Architect / Architectural Historian, conducted the site visit on August 9, 2010. The purpose of the site visit was to observe and photograph the subject property and the surrounding community in order to understand and identify the architectural styles, character-defining features, building alterations and development patterns that comprise the property and those in its immediate vicinity. Representative exterior and interior views of the Tenant Activity Building were photographed as part of field survey efforts and are included in this report.

Archival research included a review of relevant records and reference resources on file at the San Diego Central Library California History Room, the San Diego History Center Research & Photographic Archives, the National Archives at Riverside and regional university libraries at San Diego State University (Special Collections) and the University of California at San Diego. With Principal oversight Malia Bassett conducted contextual and property-specific historical research. Information reviewed and obtained includes San Diego City Directory listings, historic Sanborn Fire Insurance Map publications for San Diego, City of San Diego building permit applications and water and sewer service connection records, County of San Diego Commercial Building Records, and Grantor-Grantee Indexes referencing property ownership deed filings. Urbana’s in-house library provided additional context on the historical development patterns for Linda Vista and the subject property.

The technical analysis consisted of reviewing the building at 6907 Linda Vista Road under the eligibility criteria of the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register) and the City of San Diego Historical Resources Register (Local Register). These eligibility criteria establish a threshold under which a property may be determined to meet the definition of an historical resource for the purposes of CEQA and the local planning and development discretionary review process. For the purposes of consistent decision-making, the subject property’s history, architectural features, and integrity were analyzed within the context of the surrounding community, nearby designated properties, and within the identified context of the historical development patterns of Linda Vista. Lastly, this report was prepared pursuant to the City of San Diego’s May 2009 Historical Resource Technical Report Guidelines and Requirements contained within Appendix E Part 1.2 of the Land Development Manual.
III. HISTORIC PRESERVATION REGULATORY FRAMEWORK

Following is an overview of historic preservation regulatory framework related to current and future projects proposed at the 6907 Linda Vista Road property.

Section 106 of the National Historic Preservation Act (NHPA)

Section 106 of the National Historic Preservation Act (NHPA), as amended, requires federal agencies to consider the effects of proposed federal undertakings on historic properties. A historic property is defined as any building, site, district, structure or object that is listed in or eligible for the National Register of Historic Places. Two scenarios exist relative to the effects a potential undertaking may have on an historic property: 1) No historic properties affected, or 2) Historic properties are affected.

If the federal agency official finds that there are historic properties which may be affected by the undertaking, the agency shall notify all consulting parties, invite their views on the effects, and assess adverse effects (36 CFR part 800.4). An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative (36 CFR part 800.5). Examples of adverse effects include:

- Physical destruction of or damage to all or part of the property,
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s of the Interior’s Standards for the Treatment of Historic Properties (contained within 36 CFR part 68) and applicable guidelines,
- Removal of the property from its historic location,
- Change of the character of the property’s use or physical features within the property’s setting that contribute to its historic significance,
- Introduction of visual, atmospheric or audible elements that diminish the integrity of the property’s significant historic features,
- Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization, and

A finding of no adverse effect may be issued if the proposed undertaking’s effects do not meet the above-listed examples pursuant to 36 CFR part 800.5(a)(1), or if the undertaking is modified or conditions are imposed, such as the subsequent review of plans for rehabilitation by the State Historic Preservation Office (SHPO) to ensure consistency with the Secretary of the Interior’s Standards for the Treatment of Historic Properties and applicable guidelines, in order to avoid adverse effects.

National Register of Historic Places Eligibility Criteria

A historic property is defined as any building, site, district, structure or object that is listed in or eligible for the National Register of Historic Places. In order for a property to qualify for the National Register of Historic Places it must meet one of the four National Register Criteria for Evaluation listed below by being associated with an important historic context and retaining historic integrity of those features necessary to convey its significance. According to the National Register Bulletin 15 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
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 represents a significant and distinguishable entity whose components lack individual distinction; or
D. That have yielded, or may be likely to yield, information important in prehistory or history.
California Environmental Quality Act (CEQA) & Historical Resources

The California Environmental Quality Act (CEQA) was enacted in 1970 in order to inform, identify, prevent, and disclose to decision-makers and the general public the effects a project may have on the environment. Historical resources are included in the comprehensive definition of the environment under CEQA. Under CEQA a historical resource is defined as:

- Any resource listed in or determined eligible for listing in the California Register of Historical Resources by the State Historical Resources Commission; or
- Any resource included in a local register of historical resources pursuant to §5020.1(k) of the California Public Resources Code; or
- Any resource identified as significant in a historical resource survey meeting the criteria set forth in §5024.1(g) of the California Public Resource Code; or
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. 1

In order to be eligible for listing on the California Register of Historical Resources, one of the four following criteria must be met:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, region, or method or construction, or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1

Projects & Significant Effects

CEQA Public Resources Code §21084.1 provides that any 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. Public Resources Code §5020.1(q) defines “substantial adverse change” as demolition, destruction, relocation, or alteration such that the significance of the historical resource would be impaired.

Generally, a project that follows 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 (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource. The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation of historic materials and features. The Standards pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and interior of the buildings. They also encompass related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction.

The Secretary of the Interior's Standards for Rehabilitation

"Rehabilitation" is defined as "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values."

1 C.C.R. Title 14, Chapter 3, Article 5, §15064.5 (a)(1-3).
The treatment "rehabilitation" assumes that at least some repair or alteration of the historic building will be needed in order to provide for an efficient contemporary use; however, these repairs and alterations must not damage or destroy materials, features or finishes that are important in defining the building's historic character. The ten Standards for Rehabilitation are as follows.

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

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

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

City of San Diego Historical Resource Register Eligibility Criteria

Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district area or object may be designated as historic by the City of San Diego Historical Resources Board if it meets any of the following criteria:

1. 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;

2. Is identified with persons or events significant in local, state or national history;

3. 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;

4. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman;

5. 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 California Register of Historical Resources; or
6. Is a finite group of resources related to one another in a clearly definable way, or is a
geographically definable area or neighborhood containing improvements which 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.

**Integrity**

According to *National Register Bulletin 15* to retain historic integrity a property will always possess
several, and usually most, of the seven aspects of integrity identified as:

- Location (the place where the historic property was constructed or the place where the historic
event occurred),
- Design (the combination of elements that create the form, plan, space, structure, and style of a
property),
- Setting (the physical environment of a historic property),
- Materials (the physical elements that were combined or deposited during a particular period of
time and in a particular pattern or configuration to form a historic property),
- Workmanship (the physical evidence of the crafts of a particular culture or people during any
given period in history or prehistory),
- Feeling (a property’s expression of the aesthetic or historic sense of a particular period of time),
and
- Association (the direct link between an important historic event or person and a historic property).
IV. HISTORICAL OVERVIEW

Setting
The subject property is a two-story commercial building located at the intersection of Linda Vista Road and Comstock Street on Lot 5 of Block 54 of the Linda Vista Subdivision Unit No. 1. The building is identified as 6907 Linda Vista Road and is located within the boundaries of the Linda Vista Community Planning Area. The immediate setting for the property is commercial strip development, civic buildings, and single- and multi-family dwellings constructed primarily in 1941. The subject building was originally constructed as the Tenant Activity Building to serve the community and recreational needs of the residents of the Linda Vista Housing Project. The Tenant Activity Building pre-dates the development of the Linda Vista Shopping Center block. Because it is located within the physical boundaries of the Linda Vista Shopping Center block, the Tenant Activity Building has been erroneously identified as having been built as part of the shopping center complex. The Tenant Activity Building was constructed independent of the shopping center for the separate and distinct purpose of housing community activities and uses for tenants of the federally constructed Linda Vista Housing Project.

The Linda Vista Housing Development Project, Linda Vista, San Diego
Situated northeast of San Diego on the hills of Kearny Mesa, Linda Vista, named “beautiful view” for its views of the San Diego city and bay, was initially developed as a garden city in the 1940s through a series of WWII federal housing initiatives. Speculative improvements occurred in 1927 when the land area was subdivided as “Chesterton” by developers Oscar W. Cotton, owner and President of the Pacific Building Company, and A.H. and Martha Frost. The Frosts and the Union Trust Company filed an addition to the original subdivision known as the “Chesterton Extension” three months later. These subdivisions never materialized, but portions of the layout and street names were maintained and eventually were incorporated into the Linda Vista Housing Development. In less than a year, between 1940 and 1941, Linda Vista was transformed into a federally planned community modeled after garden city town planning principles and Clarence Perry’s Neighborhood Unit Theory. While much of the military and war industry support housing constructed in WWII was intended for temporary occupation, including some buildings at Linda Vista, the community of Linda Vista has established itself as a lasting entity in San Diego.

Image 1: Linda Vista c. 1920s showing advertisement sign for sale of 60ft Lots at $150 each in the O.W. Cotton Chesterton Tract (left) and the Tract Office (right). Source: San Diego History Center Photograph Archives.

At the onset of WWII, San Diego experienced a severe housing shortage as workers in war support industries arrived for new defense jobs. According to Abraham Shragge in his article entitled A New Federal City

As the city’s manufacturing enterprises geared up for wartime production, tens of thousands of people swarmed into town in search of jobs, while the local military bases grew markedly in both number and size. Central-city and suburbs alike swelled to accommodate the newcomers, and the city’s utility systems and water supply all but failed to keep up with demand. With substantial help from the federal government, San Diegans attacked these and related problems in various ways, and to an extent succeeded in solving many of them. Almost overnight, the war appeared to have turned San Diego into a real metropolis.
In reaction to the population boom and the resultant housing shortage, on October 14, 1940, the U.S. government initiated the Lanham Defense Housing Act to aid in and finance the construction of defense housing throughout the nation. The legislation called for the funding of large-scale home building projects at military bases and key cities throughout the U.S. and provided for the construction of temporary and permanent affordable housing to be constructed in war-affected and war support communities.

San Diego’s combined naval operations, established defense industry and growing population attracted initial consideration for housing construction aid under the Lanham Act. In 1940, approximately fifty thousand individuals arrived in San Diego allowing for a total of 90,000 defense workers in San Diego with more expected in the coming years. The vacant 1,200 acres on the southwestern corner of Kearny Mesa became the preferred location for development of the Linda Vista housing project. Despite its isolated location, the undeveloped area was attractive because it only had one owner, thus making government acquisition uncomplicated. The Linda Vista Housing Project was one of the original and largest projects initiated under the Lanham Act.

Plans for Linda Vista were initiated in approximately 1940 as the Linda Vista Housing Project (Defense Housing Project #4092). With oversight by the Federal Works Administration (FWA), S.E. Sanders, City Planner for the Public Buildings Administration (PBA) designed the site plan for Linda Vista with a focus on the application of Neighborhood Unit Theory principles. The Neighborhood Unit Theory was initially introduced in the *Regional Plan of New York And Its Environs* published in 1929. In Volume 7 of the document, planner Clarence Perry authored the *Neighborhood and Community Planning* piece outlining his Neighborhood Unit Theory. The Neighborhood Unit scheme embraced six principles: size, boundaries, open spaces, institution sites, local shops and an internal street system; and the underlying theory supported the idea was that an urban neighborhood should be regarded both as a unit of a larger whole and a distinct entity in itself.


The Neighborhood Unit Theory emphasized a self-contained community with definable boundaries, large blocks and open spaces, a designated service space at the central point, as well as a separation between pedestrian and vehicular traffic. The Neighborhood Unit Theory became a model for subdivision designs by professional city planners, architects, the federal government, and community builders as early as the 1920s and was influential in the design and implementation of the Linda Vista Housing Development project. An early-applied example of neighborhood unit design was the 1930s greenbelt community of Greendale, Wisconsin, managed and designed by Sherwood Reeder. His knowledge was carried over to Linda Vista when in 1941, shortly after finishing the Greendale project, he moved to San Diego to assist in plans for the Linda Vista housing project.
Image 3: Aerial view north of Linda Vista c. 1952 with captions denoting Neighborhood Unit characteristics. Source: San Diego History Center Photograph Archives.
His experience with designing neighborhood unit developments can be seen in the similar designs used at Linda Vista in that, “both featured a central shopping and communities activities area.”vii Characteristic of the neighborhood unit design, the Linda Vista Housing Development featured recreation and park space throughout the neighborhood, consistent street patterns such as main highways Linda Vista Road and Ulric Street, a belt highway such as Comstock Street and interior streets that were harmonious with intended uses, as well as bunched shopping districts, and a centrally located community center.

Based on the immediate housing needs, the construction objective of the Linda Vista Housing Project was 3,000 dwelling units for more than 13,000 people with a 300-day construction deadline. The houses were designed by PBA architect C.D. Persina who focused on functional and simple designs. He designed all the houses with the same floor plan; allowing for low-cost and efficient construction. Construction was contracted to Los Angeles based McNeil and Zoss Construction Companies who had previous experience in constructing extensive projects including public buildings for the federal government.\textsuperscript{xviii} Construction began on December 28, 1940 with use of assembly line techniques and large-scale organized and economical methods to finish within the set time constraints. At the peak of production, up to forty houses were being completed each day.\textsuperscript{x}

Linda Vista’s 3,001 permanent residential units were opened to tenants in May 1941 with the first keys issued to the August Huggins family for a unit at 1576 Acheson Street.\textsuperscript{v} An additional 1,845 temporary residential units were added by 1943, thus totaling 4,846 dwelling units for approximately 13,000 people.\textsuperscript{xi} Linda Vista Road; a narrow two-mile two-lane road running north-south along the canyon served as the main access route by automobile to and from Linda Vista, with side streets culminating in cul-de-sac loops branching from it.\textsuperscript{xii} By November 5, 1941, upon completion of construction, over half of the dwellings were already occupied.\textsuperscript{xxi}
Typical to quickly constructed wartime housing developments, Linda Vista lacked local community services facilities or amenities including schools, shops, public services, grocery stores and recreational facilities. The federally sponsored housing developments constructed under the 1940 Lanham Act only provided for the funding of housing and did not account for funding the construction of commercial and civic facilities to serve the residents of wartime housing projects. Further, developers were reluctant to commit to the construction of commercial facilities given the idea that the surrounding housing was a temporary military expenditure and posed an unprofitable investment. In 1941 an amendment to the Lanham Act provided for public works grants that could be used for the construction of community facilities. The original plan for the Linda Vista Housing Project set aside a large block along Linda Vista Road for the construction of a commercial and administrative center; i.e. the “unit” per Perry’s Neighborhood Unit Theory, that had remained vacant until the 1941 amendment.

In June 1942, following the 1941 Lanham Act amendment, guidelines were prepared for development of commercial facilities funded by the Federal Public Housing Authority. Compliance with these design and construction guidelines was required for commercial and administrative facilities funded by the federal government. The guidelines outlined the siting of buildings and open space and called for a pedestrian friendly approach. As an anchor to the civic and community unit, construction of a community building began in August 1943 on the southwest corner of the vacant designated commercial and administrative block on Linda Vista Road to be completed in ninety days. Upon completion of construction, local residents renamed the community building as the Tenant Activity Building and it was promptly utilized as the first multi-use recreational and civic facility for Linda Vista.

With the Tenant Activity Building completed, a separate construction campaign was initiated to serve retail needs of residents. On February 2, 1943, a Safeway opened on as the first grocery store in Linda Vista. Despite wartime rationing policies the grocery store was well stocked with goods such as eggs, meat and butter. However, it was still no match to the needs of the 14,000 residents in Linda Vista at the time. By 1943 plans were underway for a multi-faceted shopping center that would occupy the outstanding commercial and administrative space between Comstock Street and Ulric Street on Linda Vista Road. Under the National Housing Agency, Architects Earl F. Gilbertson and Whitney R. Smith of Pasadena designed the Linda Vista Shopping Center.

Image 6: Plan for the Linda Vista Shopping Center. The Tenant Activity Building was already constructed on the parcel at the left side of the plan that is depicted as vacant.

Source: Talbot Hamlin “Forms & Functions of Twentieth-Century Architecture.”
The Linda Vista Shopping Center was designed in kind with the surrounding neighborhood unit plans featuring two arrays of buildings that opened into a broad, landscaped mall.\textsuperscript{xvii} There was no defined front or main entrance as storefronts faced inwards towards each other, and were removed from traffic while parking was at the building perimeters. The original 82,000 square foot shopping center featured a barbershop, market, drugstore, a five and dime, bakery, a junior department store, and other services.\textsuperscript{xviii} The buildings at the Linda Vista Shopping Center were demolished as a part of a 1970s redevelopment campaign for Linda Vista.

Linda Vista remained under federal authority through the 1940s with dwindling federal support for services and facilities after the conclusion of WWII in 1945. Dwellings and some commercial buildings were sold to private ownership in 1954.\textsuperscript{xx} Into the 1960s, Linda Vista continued to develop as a suburban neighborhood of San Diego. Despite the continuous outward growth to the north and the south, the original plan of Linda Vista, including its original street layout and siting of community resources, along with the Tenant Activity Building, has remained true to the 1941 Linda Vista Housing Project design; ultimately serving as an example for wartime construction measures and large-scale federally sponsored community building methods in the WWII era.

The Linda Vista Tenant Activity Building (2221 / 6097 Linda Vista Road)
Located central to the Linda Vista Housing Development, the area along Linda Vista Road between Ulric Street and Comstock Street was zoned for the civic and commercial uses when plans were drawn for the housing development. The commercial and civic center plan was not executed with the housing project due to the lack of funds providing for community centers under the Lanham Act. The central location of the Tenant Activity Building was consistent with the neighborhood unit scheme and served as a significant gathering place for the entire community. The overdue addition of the community center in Linda Vista was considered important to enriching the San Diego community. Community activities were viewed as a morale boosting contribution to the war effort in keeping a stable home-life for defense workers and their families. When the Tenant Activity Building opened over 32 organizations began to utilize the space for meetings, social events and other related community uses. For a 10-year period, the Tenant Activity Building housed all-age events including church gatherings, gymnasium, dances, and drama and club meetings.

The building was constructed in a 257’ x 168’ wood frame and stucco form by O.L. Carpenter for $125,625. With a principal barrel vault roof, the building accommodated approximately 2,000 persons and featured a gymnasium, an auditorium, and a large social and recreation room (24’ x 48’) with two smaller activity rooms measuring 16’ x 24’ along with a game and recreation terrace. Additional elements of the building included offices at the perimeter; check rooms, a projection booth and storage space, lockers and showers, and a kitchen. A patio with an outdoor fireplace and an open courtyard was located at the southern end of the building.\textsuperscript{xx}
Originally identified as 2221 Linda Vista Road, the Linda Vista Tenant Activity Building was constructed under the Federal Public Housing Authority (FPHA) as a part of the original Linda Vista Housing Development Project. Construction of the building began in August 1943 and was completed within 90 days. The moniker assigned to the commercial building was derived from its original use as the first community building for the tenants of the Linda Vista defense housing project. Prior to the construction of the Tenant Activity Building, the residents of Linda Vista were without a meeting place for community activities. Aubrey M. Davis, the Federal Housing Authority manager for the Linda Vista Housing Development project, dedicated the Tenant Activity Building on December 26, 1943.xx

Image 8: Game tables in lounge at Tenant Activity Building interior showing courtyard south window wall. Source: San Diego History Center Photograph Archives.

After WWII ended in September 1945, federally funded community and recreational programs at the Tenant Activity Building began to lose financial support. That same year, the structural soundness of the building was rejected when City of San Diego City Building Inspector, Oscar Knecht, found that the building needed to be remodeled for compliance with city and state safety laws. Among the suggested remodels were masonry replacement, addition of exits, and fireproofing. In the meantime, it was suggested that the building be closed during remodeling.xxii However, John A. Arvin, the FPHA area manager chose to keep the building open arguing that it was constructed with federal funds under the Lanham Act with materials and specifications of a “temporary structure” built for wartime housing measures.xxiii

Image 9: Children at Halloween Party for craft class at the Tenant Activity Building showing north courtyard wall (wall extant). Source: San Diego History Center Photograph Archives.

By 1951, the Linda Vista commercial area, including the Tenant Activity Building, was slated for public sale. The proposed sale was rejected by the community, with Linda Vista residents maintaining that the Tenant Activity Building was the “only place where basketball, other gym activities and indoor assemblies can be held.”xxiv The land was appraised at two million dollars and it was concluded by the Public Housing Authority (PHA) that the land was too valuable to sell at a discounted price. In compromise, the building was to remain open for another two years as the Tenant Activity Building, and in the interim, the city was to find another location to host community activities for Linda Vista residents. By the fall of 1953, the Tenant Activity Building closed and was reopened under private enterprise as a supermarket.

Supermarkets and chain grocery stores continued to occupy the old Tenant Activity Building through 1976 including Roy’s Markets, Inc in 1961, Alpha Beta Acme Markets from 1962-1968, and Hometown Markets & Pharmacy from 1969-1973. In 1975, the current occupant, Skateworld moved into the building, prompting an interior remodel for use as a roller skating rink. By 1978 the building was addressed as 6907 Linda Vista Road. In 1983, Skateworld added a 29,003 square-foot skate boutique to the west elevation of the building.xxv
V. ARCHITECTURAL OVERVIEW

The Linda Vista Tenant Activity Building was constructed in 1943 as the principal community center for the federally constructed World War II-era Linda Vista neighborhood. The building is an 800 Series Field House, a property type developed by the United States Military in the early part of World War II. The ratio of community facilities to dwelling units in Linda Vista was 1:3,000; presumably a standard followed for all similar resource allocations in federally constructed communities and at military installations. By the end of WWII the United States Government had constructed 625,000 housing unitsxxvi, which would have resulted in the construction of approximately 208 community center buildings at federal installations and federally constructed communities around the country. Today the Linda Vista Tenant Activity Building appears to be one of the remaining extant community facilities buildings.

800 Series FH-A Field House

The Field House was a part of the 800 Series of structures designed and built by the United States military for the construction of temporary and permanent military facilities from 1941-1942. It’s name and classification was assigned by the Construction Division of the United States Army Quartermaster Corps. With upgrades and contemporary modifications, the 800 Series replaced the Army designed Series 700 structures constructed between 1937 and 1940. The 800 Series allowed for more functional, livable and safer buildings that could be constructed for a lower manufacturing and construction cost.xxvii According to John S. Garner in his study titled *World War II Temporary Military Buildings*

Among the most imposing of the Series 800 structures were the ‘Field Houses.’ Until the development of the Type FH-A Field House in late 1941, large assemblies for sports activities took place in modified theater buildings designated as sports arenas. Organized team sports were considered important to the recreational needs of soldiers, and the new structures provided clear spans and overhead clearances for indoor volleyball and basketball. Steel segmental arches set 20 ft apart and anchored at each end to a concrete deadman offered a span between stabilizing columns of 104 ft. From finish floor to the bottom flange of the arch at center span was approximately 32.5 ft. The arches were the only steel members; the columns, beams and purlins were timber. The columns were composed of four 2x12s. The end walls were framed in 2x12s spaced 2 ft on center; sidewalls were 2x4s spaced 16 in on center. On either side of the playing courts were rows of offices and lockers. Above these a clear story of fixed sash windows lighted the interior space. Built up roofing covered timber decking supported by 2x10 purlins that spanned between arches. Because field houses were considered division-echelon buildings, no more than one such structure per division was constructed.xxviii

Typical specifications for the 800 Series Field House include steel or glue laminated timber trusses that ascend to a height of approximately 32’ and that are installed approximately 20’ apart, a building width (including single-story wings) of approximately 110’, a building length of approximately 155’ (including any single-story wings).xxix Steel shortages resulted in the use of laminated wood trusses for the oversized structural arches that formed the ribs of the Field Houses. Variations to these specifications appeared to have occurred according to the programmatic needs and environmental constraints for each building. One typical variation of the Field House was the Naval Drill Hall, a United States Navy structure erected to house activities relating to physical condition and recreation. The Naval Drill Halls maintained the overall form and appearance of the 800 Series Field House, but were typically larger with an arch height of approximately 39’, an arch span of approximately 120’, an arch width (from base to base) of approximately 90’, arches installed approximately 16’ apart with footings measuring approximately 30” x 7.5”, a building width of approximately 90-100 and building lengths ranging anywhere from 350’ to 625’.xxx
**Utilitarian Quonset Hut**

Quonset huts are Utilitarian structures commonly constructed in the United States during WWII as smaller versions of the 800 Series Field House Style and were incorporated into the American military and architectural ideology in 1941. The original design from the early 40's was constructed with steel, kit-like pieces that fit together to form its signature “half-barrel” arched shape. Each arch was positioned four feet on center and acted as “one continuous arch so that the wall and roof were one structural member.”xxxi Bolts anchored the prefab arches in place onto a concrete slab measuring 20’x48’. Metal decking ran through a form roller was applied as the skin of the metal frame. The structures were designed to be temporary and reusable.xxxii

*Image 11: Historic image showing factory workers testing building a Quonset hut, West Davisville, RI, circa 1941.*


In the post-WWII period Quonset Huts were utilized for a range of industrial, commercial and residential purposes. Today Quonset Huts serve as physical remnants of wartime construction techniques and design ingenuity.

**Tenant Activity Building**

Unlike the ephemeral nature of the Field House, the heavy wood arch construction of the Tenant Activity Building reflects a sense of permanence. With its full-span glue laminated timber truss arches, barrel roof form, and single story surrounding wings the Tenant Activity Building embodies the distinctive characteristics of the 800 Series Field House property type and shows a similar influence by the Naval Drill Hall variation. The current scale of the Tenant Activity Building is in keeping with it’s military Field House prototype, with a footprint measuring approximately 200’x175’ with 2’-3”x5” glue laminated timber arches roughly 32’ at center height with 16’ between each arch. Its stripped-down appearance, not intended to be eye-catching, featured a symmetrical design with 29” (approximate) clearstory windows that followed the rooflines of the building, deep overhangs at the entrances, vertical slats of wood on edge that lined the north elevation, and an apron wall also on the north elevation of the building.


Located at 6907 Linda Vista Road, formerly 2221 Linda Vista Road, the presumed entrance to the building based off historic aerial photographs,
faced Comstock Street and was positioned at the center of the south wall. Other entrances were located on the southern portion of the east and west walls, with all entrances having a concrete pathway that connected the building to Linda Vista Road to the west, Comstock Street to the south and a parking lot to the east. An additional exit appears to have been located at the north elevation of the building. Consistent with the symmetrical nature of a Field House, the Tenant Activity Building was symmetrically built about the north/south axis with flat-roofed wings wrapping the east, west, and south walls of the centrally located barrel-roofed form.

A rectilinear courtyard located south of the barrel roof was lined with full-height window walls, which provided a direct line of vision through the courtyard. The northern wall of the courtyard was constructed of reinforced concrete and featured an incised grid with each grid block measuring 3’ x 1’ with a ½” inset. The same wall also housed an incinerator (fireplace), which was accessible from inside the building. The wall projected approximately three feet beyond the height of the surrounding flat roofline and enclosed the incinerator flumes. Clearstory windows lined the building’s single-story on the east, west and south. Clearstory windows were also positioned above the flat roofline on the east and west walls to allow light to enter the barrel-roofed area. Original building materials consisted of a reinforced concrete foundation, 2x4 wood framing for flat composite-roofed areas, heavy glue-laminated timber arches for the barrel-roof, and stucco exterior siding. Historic aerial photographs, building records and permit applications disclose that the building retained its original form from 1943 to 1953 when the building was decommissioned as a federally owned building and was sold into private ownership.

In the mid-to-late 1950s, the building changed ownership and experienced some exterior modifications. Between 1953 and 1956, two breezeways were added to the northern wall of the building. The northwest breezeway extended to the sidewalk parallel to Linda Vista Road connecting the building with the street. Around this time, multiple tenants were occupying the building; so it is presumed that new entrances were added to the northeast and northwest corners of the building, hence the breezeway addition.

The most significant changes occurred to the building envelope between 1961 and 1965, with the removal of the entire south courtyard space. The northern reinforced concrete wall within the courtyard was retained, but the courtyard was removed. It is unknown what prompted the removal of the south courtyard, as a permit was not identified for the project. As a separate, abutted volume, the courtyard’s removal did not affect the design or configuration of the principal barrel-roofed volume. Extant foundation materials of the courtyard area were uncovered during field survey activities, including red tinted concrete, remnants of 9”x9” linoleum tile, and original concrete sidewalk pathways. The red tinted concrete is believed to be the flooring surface for the south courtyard. Additionally concrete footings with steel rebar were observed approximately 50’ south of the incised grid wall that once served as the courtyard’s north wall. These footings appear to be the location of the south entry doors to the removed courtyard.

Image 13: Historic Aerial photograph circa 1964. Note the breezeway at the upper left and foundations for the removed south courtyard.

In 1961, a 24’x107’ storage space valued at $23,860 was added to the northern portion of the east wall and the northeast breezeway was infilled for use as a trash enclosure. Another renovation occurred in 1965, this time to the interior. A 1,500 square foot interior renovation consisted of the removal of two non-bearing walls, the installation of windows and repairs to the flooring and ceiling.

In May of 1975, a building permit for a sign installation was approved, notating Skateworld as the buildings’ new tenant. In November of the same year, the building underwent another interior remodel. One year after Skateworld moved in, the City of San Diego deemed the building as violating City of San Diego Building Codes, which required the occupant to install “X” bracing between ribs of the barrel-vaulted portion of the building or vacate the premise for non-compliance. Based on historic photographs and aerial photographs obtained from the San Diego History Center, sometime between 1969 and 1980, the northwest breezeway enclosure was removed and the corner was made square.

After eight years of occupying the building, Skateworld underwent an extensive remodel, stripping the Tenant Activity Building down to its shell and installing the proper features of a roller rink, such as a skate rental space, a pro shop, a game room, a snack bar, private offices, a mini-rink that is now a party area, and outward-facing retail shops that share the east and west walls of the centrally located, barrel-vaulted rink. Most of the modifications were made to the interior of the building, with few changes to the building envelope. Exterior changes included filling in the northeast corner of the building and adding an overhang to the new entrance located at the southwest corner. During this time, the clearstory windows on the east and west walls were likely removed and replaced with storefront windows. The second-level clearstory windows that filtered light into the center of the building appear to have been filled in at the east wall and boarded over at the west wall. Boards installed at the upper level of the west interior wall appear to be covering the clearstory windows or the former clearstory window location. According to the County of San Diego Assessors Building Record, the building materials reflected the materials used with the original construction, with exception to installing metal windows, likely at the storefronts. In September of 1983, Skateworld re-opened for business.

Characteristics of the 1943 design that can still be observed today include the Field House form with the prominent barrel-roof, the glue laminated timber trusses, the incised grid courtyard wall at the south elevation, the apron wall and vertical wood slat siding at the north elevation, and the south facing, second level gable (barrel) vents with original louvered wood slats.

Removed features include all the first level clearstory windows, all second level clearstory windows at the east elevation, the south courtyard with full-height window walls, and the east elevation wall (due to 1961 addition and storefront alterations). The original clearstory windows at the second level west elevation appear be intact but have been covered up during modifications.

Following is an Exterior Modifications Timeline illustrating exterior modifications from 1946-present and representative current photographs.

Photo 1: Showing southern portion of the west elevation.

Photo 2: View southerly showing the east elevation.
Photo 3: View east of north elevation.

Photo 4: View east of north elevation.
Photo 5: view northwesterly of the east elevation.

Photo 6: view of the south corner of the east elevation.
Photo 7: view north of the south elevation showing the extant historic courtyard wall (grid wall) and the original barrel roof with wood slat louvers in the arched gable vent.

Photo 8: Detail view of extant historic courtyard wall (grid wall).
Photo 9: View northwest of the barrel vault roof’s south gable wall.

Photo 10: View north of the south ridge of the barrel vaulted roof.
Photo 11: Showing detail of the arched fascia boards that enclose the north and south rooflines.

Photo 12: View north of the skate-rink area interior showing oversized arched roof trusses.
Photo 13: Detail of arched roof trusses. The arched trusses are made of layers of glue-laminated timber.

Photo 14: Detail of oversized arched roof truss’
Photo 15: Detail of oversized arched roof truss base.

Photo 16: Detail of oversized arched roof truss base and wood exposure.
Photo 17: Interior view of assumed location of the original clerestory windows, at the west wall. The windows or framing may be extant but boarded-over.

Photo 18: View of the historic projection room from the skate rink floor.
Photo 19: View of the historic truss system from the historic projection room.

Photo 20: Detail of roof truss spanning through the projection room.
Photo 21: View of the original interior fireplace and surrounding historic grid wall.

Photo 22: Detail of original courtyard foundation extant red tinted concrete, and 9”x9” linoleum tile.
V. ELIGIBILITY ANALYSIS

San Diego, California, & National Register Eligibility Analysis

Association with an Important Event (San Diego Register Criterion 1 / California Register Criterion 1 / National Register Criterion A)

As the central community center to the Linda Vista Housing Project, the Tenant Activity Building appears to be individually eligible for an association with wartime community development patterns in San Diego from 1943 through 1953. The Tenant Activity Building represents historic development patterns and methods in the WWII era of San Diego’s planning and development history when comprehensively constructed communities were financed and built by the federal government to meet wartime housing needs. The building served as the gathering place for civic organizations, churches, schools, clubs, sporting events, dances, and other community activities for Linda Vista residents. As such the building appears to be eligible for inclusion on the City of San Diego Historical Resource Register and California Register under eligibility Criterion 1 and the National Register of Historic Places Criterion A.

Association with an Important Person (San Diego Register Criterion 2 / California Register Criterion 2 / National Register Criterion B)

No information was identified during historical research to support a statement of significance for any property owners or tenants of the building as important persons in local history, or for having an important association with the buildings they owned. As a result, the Tenant Activity Building does not appear to be eligible for inclusion on the Local Register or California Register under eligibility Criterion 2 and the National Register of Historic Places Criterion B.

Embodiment of an Architectural Style, Construction Method, or Work of a Master (San Diego Register Criterion 3 / California Register Criterion 3 / National Register Criterion C)

The Linda Vista Tenant Activity Building was constructed in 1943 as the principal community center for the federally constructed World War II-era Linda Vista neighborhood. The building is an 800 Series Field House, a property type developed by the United States Military in the early part of World War II. The Tenant Activity Building was constructed under the funding of the 1941 Lanham Act amendment and according to design guidelines for commercial facilities issued by the Federal Public Housing Administration. The building’s form was modeled after the United States Military 800 Series Field House property type and the related Naval Drill Hall structures erected throughout the country in the WWII-period. As a property type the Field House was employed for temporary and permanent structures intended for mobilization or military support purposes. The Tenant Activity Building, with its expansive barrel roof and full-height glue-laminated arched timber trusses, was intended to serve as a permanent facility for the civic, recreational, and communal needs of Linda Vista residents. The building was monumentally sited at the principal intersection of Linda Vista Road and Comstock Street, and would have served as the welcoming building at the Linda Vista gateway. The building is considered to embody the distinctive characteristics of WWII-era military architecture and the 800 Series Field House property type.

Under the Lanham Act, the federal government built approximately 625,000 housing units. Of those 625,000, approximately 580,000 units were constructed for temporary uses and were destroyed after the war. XXXIII Approximately 45,000 housing units remained in the post-WWII period. Community facilities intended to serve the surrounding housing units were likely similarly removed. The ratio of community facilities to dwelling units in Linda Vista was 1:3,000; presumably a standard followed for all similar resource allocations in federally constructed communities and at military installations. Applying the 1:3,000 ratio (community buildings: housing units), the federally constructed 625,000 dwelling units would have resulted in the construction of approximately 208 community center buildings at federal installations and federally constructed communities around the country. The loss or removal of 580,000 units at the end of WWII likely resulted in the removal of approximately 193 of the associated community facilities that had supported the residents of the removed units. The remaining quantity of WWII-era federally constructed dwellings has been estimated at approximately 45,000 for which approximately 15 community center buildings would be associated with. Today the Linda Vista Tenant Activity Building appears to be one of the remaining extant community facilities buildings dating to and directly associated with WWII-era federal construction campaigns funded by the 1940 Lanham Act and its 1941 amendment that provided for the construction of community resource and recreation facilities.
For its embodiment of WWII-era American Military Architecture and the 800 Series Field House property type, with its full-span glue laminated timber truss arches, barrel roof form, and single story surrounding wings the Tenant Activity Building has been found eligible for inclusion on the San Diego, California, and National Registers under Criterion 3 / 3 / C respectively.

Information Potential (California Register Criterion 4/ National Register of Historic Places Criterion D)
While the Tenant Activity Building appears to be one of the few remaining community-use buildings specially constructed by the federal government as part of WWII neighborhood construction campaigns, and the building may warrant further research to fully identify and examine federal design and construction techniques for the 800 Series Field House Property type, the building, at this time, has not been found eligible for inclusion on the National Register of Historic Places or the California Register of Historical Resources under eligibility Criterion A and 4 respectively.

Recognition as a Historic District (San Diego Criterion 6)
The Tenant Activity Building appears to be eligible for recognition as a contributing element to a potential Linda Vista Housing Project Historic District that represents a finite group of resources related to one another in a clearly distinguishable way and comprises a geographically definable area exhibiting special character, historical interest and aesthetic value associated with Linda Vista’s architectural, development and land planning history in the City of San Diego during WWII. The Tenant Activity Building is directly associated with and represents the communal meeting, recreation, and entertainment space for the Linda Vista community, and as such, pending a formal survey and eligibility evaluation of the Linda Vista community, it appears to be potentially eligible for inclusion on the Local Register under criterion 6.

Integrity Analysis

Location
The Tenant Activity Building retains the location aspect of integrity. It is in its original location on the southwest corner of Linda Vista Road and Comstock Street where it was originally constructed and has not been physically moved.

Design
While modifications have occurred, the Tenant Activity Building retains its design aspect of integrity. The building was constructed under federal funds as a temporary structure for a multi-use community building. The executed design was typical to wartime construction methods, 800 Series Field House form with a principal barrel roof and full-span glue laminated timber trusses. While some modifications have occurred, the principal roof, truss system, building envelope, materials and overall form remain intact. Sufficient historic imagery and remnant building materials exist to inform future improvements in a manner that is consistent with the building’s design integrity.

Setting
The Tenant Activity Building retains the location aspect of integrity. Surrounding land uses, and in most instances, buildings, are the same with historic-era single-family dwellings and duplexes, facing the building across the intact greenbelt at Linda Vista Road to the west and Ulrich Street to the east. The immediate setting has been somewhat altered with the reconfiguration of the nearby shopping center, however, the remodel did not affect the large open lot that historically anchored the Tenant Activity Building’s southwest corner and south elevation.

Materials
While modifications have been made to the Tenant Activity Building and materials have been removed, all replacement material appears to have been replaced essentially in-kind, thus retaining the material combination of stucco and wood originally used in the building’s construction.

Workmanship
The building exhibits the workmanship originally employed, specifically in the principal barrel roof form and large full span glue laminated timber arches. The arches are constructed of approximately 37 timber
layers that while showing wear through decades of use still provide a tangible reminder of the building’s workmanship and capabilities of federal government contractors.

**Feeling**

The property still retains a sense of its original use as a Tenant Activity Building and WWII-era federally constructed building. Its current appearance still gives a feeling of community development patterns in Linda Vista during 1943-1953 and of American Military Architecture with its intact 800 Series Field House form.

**Association**

The building is in its original location and retains a relationship as a community-gathering place within the Linda Vista community. It also reflects its original design as an 800 Series Field House property type. The historic Tenant Activity Building retains its associative element for integrity purposes.

**VII. HISTORICAL RESOURCE CONCLUSIONS**

As the principal community center for the federally constructed WWII-era Linda Vista neighborhood, and for its embodiment of WWII-era American Military Architecture and the 800 Series Field House property type, with its full-span glue laminated timber truss arches, barrel roof form, and single story surrounding wings the Tenant Activity Building has been found eligible for inclusion on the Local, California, and National Registers under Criterion 1 / 1 / A and 3 / 3 / C respectively. Because the building has been identified as eligible for designation, the building appears to meet the definition of an historical resource pursuant to §15064.5 of the CEQA Guidelines and of an historic property pursuant to Section 106 of the National Historic Preservation Act.

It is recommended that future projects proposed at the building include adaptive reuse of all or a majority of the building, and that all work proposed conform to The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Reusing, and Reconstructing Historic Buildings or the Standards and Guidelines for Rehabilitation. Depending on the programmatic needs and design goals of future projects at the building, sufficient evidence exists to reconstruct the missing south courtyard.

Should removal, demolition, or other material changes be proposed to the building it is recommended that an impacts analysis be prepared prior to approval of projects in order to determine whether the building would retain integrity and significance after it is removed, and to determine whether any impacts identified could be mitigated to a less-than-significant level of impact to address regulatory review requirements.

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