

4.7 CULTURAL RESOURCES

4.7.1 Introduction

Cultural resources include archaeological, historic, and paleontological resources. Archaeological resources are places where the remnants of past cultures survive in a physical context that allows for the interpretation of these remains. Historic resources are historic buildings or structures that are 45 years or older and may be eligible for listing in the California Register of Historical Resources (California Register) or the National Register of Historic Places (National Register). Paleontological resources are scientific resources, and are the fossil remains of life that existed in prehistoric or geologic times. These can include plants, animals, and other organisms. Since both archaeological and paleontological resources are subsurface resources, they are both addressed in this section of the Environmental Impact Report (EIR).

This section provides a discussion of the existing cultural, historic, archaeological, and paleontological resources on the site and an analysis of the potential impacts that may occur as the result of project implementation. This section summarizes the pertinent information and findings based on information in the Cultural Resources Assessment, the Historic Resources Assessment, Fire Station Memorandum, and the Paleontological Resource Assessment, all of which are included in Appendices D, E, and F of this EIR.

4.7.2 Existing Environmental Setting

The project site is located in the Cities of Del Mar and San Diego, in northern San Diego County, and includes an approximately 300-acre (ac) Fairground and Racetrack facilities (Fairgrounds). The Fairgrounds are located in what was historically the tidal marshland and floodplain of the San Dieguito River estuary, which was the largest estuary in San Diego County and had likely been a dynamic environment throughout prehistory. The Fairgrounds site was filled in the early 1930s as part of the State of California's Swampland Reclamation Act, which was designed to develop swampland for "useful purposes." The initial 184 ac site was used as a golf course until 1936, when the golf course and 57 ac of additional land were purchased by the State Division of Fairs and Expositions for the development of a permanent Fairgrounds site.

Geologic Setting. The project is located within the San Dieguito River Valley, near the mouth of the San Dieguito River, whose watershed encompasses approximately 346 square miles. The site is underlain by shallow fill soils, alluvium, and materials of the Bay Point Formation, which consists of poorly consolidated lagoon and nonmarine sandstone. On either side of the River valley are hills that contain marine and nonmarine sedimentary rocks as old as the middle Eocene (approximately 45 million years ago). Each of the geologic units found on the project site is described below.

Middle Eocene Torrey Sandstone. The Middle Eocene Torrey sandstone was first described by Hanna (1926) for exposures at Torrey Pines State Park, located slightly more than 4.8 kilometers (km) (3 miles [mi]) to the south and referred to as the Torrey Sand. It is currently considered a formational member of the broader La Jolla Group. The La Jolla Group is an assemblage of formations that were deposited in a coastal plain environment from tidal flats out to the continental shelf. The Torrey Sandstone represents sediment that was deposited in a tidal flat to

beach environment. It consists of white to light-brown, medium- to coarse-grained, moderately well indurated (cemented), massive and broadly cross-bedded, arkosic sandstone. Arkosic sandstones are derived from the erosion of granitic rocks and have an abundant content (at least 25 percent) of the mineral feldspar; however, quartz is usually the dominant mineral.

The Torrey Sandstone contains fossil remains of shallow water invertebrates. Only one Torrey Sandstone fossil locality recorded by the San Diego Natural History Museum (SDNHM) is within 0.5 mi of the project areas. It is slightly less than 0.5 mi to the north of the Fairgrounds. This locality produced invertebrates fossils, including bivalves, gastropods, and scaphopods.

The Late Pleistocene Bay Point Formation. The Late Pleistocene (approximately 220,000 years old) Bay Point Formation was deposited in a near-shore marine environment. Sediments consist of light grey, fine- to coarse-grained, massive, and cross-bedded sandstone that is friable to partially cemented.

The Bay Point Formation has produced large and diverse assemblages of well-preserved marine invertebrate fossils. In addition, remains of fossil marine vertebrates (e.g., sharks, rays, and bony fishes) and terrestrial vertebrates (amphibians, rodents, horses, and mammoths) have also been recovered from this unit. The SDNHM has six recorded fossil localities from the Bay Point Formation within a 0.5 mi radius of the project area, none of which are within the project limits. Fossils recovered from these nearby localities include invertebrates such as crabs, barnacles, bivalves, gastropods, echinoderms, and bryozoans. In addition, these six localities have produced several vertebrate fossil remains have been found, including bony fish, amphibians, rodents, horses, mammoths, and some indeterminate mammal remains.

Alluvium. Alluvium generally consists of loosely consolidated gravel, sand, and silt ranging from poorly sorted to well-sorted. It is composed of mainly quartz but also contains feldspar, biotite, and minerals from the upstream bedrock formations and units that are being eroded. These sediments are deposited by rivers and streams and are found in stream channels and within active alluvial floodplains. The sand grains are generally subangular to subrounded, while the gravels and cobbles are rounded to well-rounded. The color is usually yellow-brown to reddish-brown. Its age can range from Recent to Latest Pleistocene (less than 10,000 years to 1.8 million years).

Recent alluvium (defined as being less than 10,000 years old) is generally too young to contain fossils. However, below the surface, fossils have been found within older alluvium during excavations for roads, housing developments, and quarries. Remains of Rancholabrean (11,000 to 300,000 years old) animals such as elephants, horses, bison, camels, saber-toothed cats, deer, and sloths are known from these excavations. There is a potential for these types of fossils in all older alluvial deposits. Fossils from older, upstream/upslope formations oftentimes are redeposited in alluvium as well.

Slope Wash. Slope wash, also called colluvium, is a geologically recent deposit of gravel, sand, silt, or mud that is usually found on the sides or at the base of slopes or cliffs. These deposits are generally loosely consolidated and were primarily deposited by gravity. Therefore, the sediments

in colluvium generally did not travel far from their source and are chiefly composed of detritus of the nearby or underlying bedrock formations mixed with varying amounts of organic material from the plants growing in the area. Slope wash is generally younger than 10,000 years and does not contain fossil remains.

Artificial Fill. Artificial fill consists of varying mixtures of clay, silt, sand, and gravel, and also may contain manmade debris, including concrete, asphalt, brick, wood, plastic, glass, metal, organic material, and other trash. It includes both uncompacted or semicompleted (nonengineered) and compacted (engineered) material that was placed by humans during construction for such projects as highways, railroads, buildings, bridges, landfills, stream channels, and land reclamation in swampy or low-lying areas. Although not specifically rated, artificial fill does not contain in-place fossils and thus is not considered to have any paleontological sensitivity.

Prehistoric Resources/Archaeological Survey. A records search was completed at the South Coastal Information Center (SCIC) at San Diego State University; it included a review of all recorded historic and prehistoric archaeological sites within a 0.5 mi radius of the project area, as well as a review of known cultural resource survey and excavation reports. In addition, the California State Historic Resources Inventory (HRI), which includes the California Historical Landmarks, California Points of Historical Interest, and various local historic registers, was examined. The results of the records and literature search indicated that 74 cultural resource studies have occurred within the 0.5 mi records search radius, of these, approximately 10 cover portions of the current project area, and 38 archaeological sites are recorded within the 0.5 mi records search radius. However, no known archaeological sites are located in the Fairgrounds project site.

Regional History. A description of an overall regional chronology demarcating the major stages of cultural evolution in Southern California has been attempted many times. Southern California researchers have divided regional prehistory into a four-stage chronology describing changing artifact assemblages and evolving ecological adaptations. The Early Period (also known as the San Dieguito Culture) covers the interval from the first presence of humans in Southern California until postglacial times (5500 to 6000 BC). Artifacts and cultural activities from this period represent a predominantly hunting-oriented culture; diagnostic artifacts include extremely large, often fluted bifaces associated with use of the spear and the atlatl (spear thrower). In Southern California, important Early Period sites have been found along the nearby San Dieguito River.

The transition from the Early Period to the Milling Stone Period (Rogers' La Jolla I Culture) is marked by an increased emphasis on the processing of seeds and edible plants and is estimated to have occurred between 6000 BC and 3000 BC. According to Wallace (1978:28), wild seeds and edible plants formed the primary food source during this period, with only limited use of shellfish and faunal resources; plant resources were processed using deep-basined mills (also called metates) and handstones (also called manos); hence, the term "Milling Stone Period." Milling Stone Period settlements were larger and were occupied for longer periods of time than those of the Early Period, and mortuary practices included both flexed and extended burials, as well as reburials. Grave offerings were few, although rock cairns were sometimes placed over the bodies.

By approximately 3000 BC, the inhabitants of Southern California were exploiting a diverse array of food resources, including seeds and edible plants, shellfish, fish, and mammals. Along the coast, a greater reliance was placed on marine food resources, as evidenced by the recovery of nearshore and pelagic (deep-water) fish remains from archaeological sites.

Intermediate Period sites are characterized by the appearance of the mortar and pestle (although the mano and metate continued in use) and small projectile points. The use of the mortar and pestle may indicate an increased reliance on acorns as a food source, while the small projectile points suggest that the bow and arrow was in limited use. The circular shell fishhook also makes its appearance in coastal sites during this period; the circular fishhook is found most abundantly in areas adjacent to a rocky coastline and may have been less subject to fouling than gorges and other types of hooks.

Researchers have had difficulty distinguishing Intermediate Period sites, since many of the tool types appear in earlier and later periods; the few known sites have often been identified using radiocarbon or obsidian hydration methods. The Intermediate Period corresponds to Rogers' La Jolla II Culture.

The Late Period (Rogers' Yuman Cultures), which began in approximately 500 AD, witnessed a number of important cultural developments in Southern California, including the concentration of larger populations in settlements and communities, greater utilization of available food resources, and the development of regional subcultures. Cremation was the preferred method of burial during the Late Period, and elaborate mortuary customs with abundant grave goods were common. Other cultural traits indicative of the Late Period include increased use of the bow and arrow, steatite (a variety of talc often used for carving) containers, circular shell fishhooks, asphaltum (as an adhesive), bone tools, and personal ornaments of bone, shell, and stone. Because many of these artifacts are also recovered from earlier periods, other indicators must sometimes be used to distinguish Late Period sites.

Project Area Development History. In 1880, the County organized its first Fair, the San Diego County Horticultural and Agricultural Display, to showcase the County's local agricultural activities. The event was staged under a canvas tent in what is now Kimball Park in National City. Examples of locally grown produce were displayed, as well as oil paintings, quilts, leatherwork, shells, and "an elegant display of photographic art" (Del Mar Fairgrounds 2006). Only limited numbers of livestock were present, as transportation to the Fair from local farms proved difficult. In the evening, Fairgoers enjoyed dinner and dancing, with music provided by the Harmony Brass Band. *The San Diego Union* reported, "Attendance on the second day was so great that long before noon, not a vehicle of any description, not a saddle horse could be had in town for love nor money" (Del Mar Fairgrounds 2006).

In 1904, the State legislature formally organized District Agricultural Associations (DAAs) as official State agencies for the purpose of promoting local agricultural production. In San Diego, the 22nd District Agricultural Association (DAA) was established.

During the early 20th century, the Fair was sporadically held at various places throughout the County, provided that the 22nd DAA was able to find a suitable location to host the Fair and the necessary funds to operate it. The Fair moved around the County to Escondido, Coronado, Oceanside, and

finally to Balboa Park in San Diego, where it remained throughout the 1920s. The Fair was not held during the Depression years of the early 1930s, as funding was not available to produce the event.

By the 1930s, California had become one of the nation's leading agricultural producers, growing some of the leading varieties of citrus, nuts, avocados, and beans. Because California's agricultural production played a major role in the development of the State, the Fairs that exhibited these products became very important.

In 1933, Assembly Bill 1115, the Horse Racing Act, was passed, legalizing pari-mutuel wagering on Race Meets at private tracks and district, County, and State Fairs. A portion of the revenues received by the State were to be used for the support of agricultural Fairs as well as to establish institutions for training youth in agricultural and animal husbandry fields. Prior to 1933, the State had eight Fairs that were partially financed by the State's General Fund. In 1946, there were 76 Fairs in California.

In September 1933, eight people were appointed to the 22nd DAA Board. The Board received financial support from the State Division of Fairs and Expositions and immediately began its search for a permanent location for the Fair. While many places throughout the County were considered, the board ultimately settled on the Del Mar golf course. The Board's choice of Del Mar was largely influenced by real estate developer E.C. Batchelder, who promised his assistance in obtaining a grant from the Works Progress Administration (WPA) for construction of the Fairgrounds. The Del Mar site consisted of approximately 184 ac, bound by State Highway 101 to the east, the Santa Fe Railroad to the west, a two-lane road to the north, and the San Dieguito River channel to the south. The location was easily accessible from both San Diego and Los Angeles, making it a logical place for a permanent home for the Fair. In 1935, the board approved Del Mar as the site and proceeded to purchase the golf course from the South Coast Land Company for \$25,000. An additional 57.2 ac were later purchased for \$10,868 with funds from the State Division of Fairs and Expositions, making the Fairgrounds a total 241.2 ac in size.

The Board immediately filed an application with the WPA for a grant of \$500,666 to construct the Fairgrounds. Following State and federal approval, construction of the first buildings began. An estimated 500,000 hours and a labor force of 380 workers were required to complete the project in a nine-month period.

Architects Joe and Sam Hamill and Herbert Louis Jackson were chosen to design the Fairgrounds. The buildings were designed in the Spanish Colonial Revival Style and were constructed of adobe bricks, which were made on site. Each of the buildings was designed to represent one of the California missions. All of the buildings are believed to have been made of native adobe, which was mixed and dried on site. The first buildings erected were the main exhibit building and auditorium, a combination Grandstands and utility building, 10 livestock buildings, an equipment shed, a main entrance building, a bell tower, and stables to house 600 horses. In addition, a 1 mi long oval-shaped Racetrack, used for harness racing, was created. The entire property was enclosed within an 8 ft high adobe wall, a portion of which still stands. An aerial photograph taken shortly after the first buildings were constructed (1939) depicts the original WPA-constructed buildings and features: the Racetrack, the Grandstands, stables, barns, and maintenance buildings, all located on the original 180 ac property.

The Del Mar Fair's opening day was Thursday, October 8, 1936. As opening day grew near, an unexpectedly large number of exhibits began arriving. This resulted in the assembly of many temporary tent structures. Through a combination of permanent buildings and tents, the exhibit area exceeded 200,000 square feet (sf). The Fair ran for 10 days and had an overall attendance of 50,000. The inaugural ceremony featured the governor; WPA administrators; State, County, and City officials; and ranking Army, Navy, and Marine officers. A plaque was laid on the bell tower that indicated that it was constructed by the WPA. (The tower burned down in October of 1969 and was rebuilt.) In addition to politicians and government officials, many recognized entertainers were present for the opening festivities, including Bing Crosby, Elizabeth Russell, Barbara Stanwyck, Robert Taylor, and Bette Davis.

Shortly after the first buildings were constructed, stockbroker William Quigley of La Jolla approached the 22nd DAA with a proposal to host Thoroughbred Race Meets at the Fairgrounds. The 22nd DAA approved the idea, and Quigley in turn secured the support and leadership of Bing Crosby to build the Del Mar Turf Club (Turf Club). The singer and actor was a resident in nearby Rancho Santa Fe and was a noted horse enthusiast. In May 1936, Crosby filed articles of incorporation and formed a board that included Pat O'Brien, Bill Quigley, C.S. Howard, Kent Allen, and Everett Crosby. A 10-year lease agreement between the Turf Club and the 22nd DAA was signed. The agreement called for the 22nd DAA to build a clubhouse, paddock, jockey's quarters, and additional horse stables to accommodate Horseracing. In order to raise the necessary funds to contribute to the project, the Turf Club spent its first year selling stock in the venture.

The friendly agreement between the Turf Club and the 22nd DAA was temporarily disrupted in early 1937, when the WPA halted construction at the Fairgrounds with \$200,000 in unfinished work remaining on the project. According to the WPA, it withdrew from the project because it had not intended to fund construction of a Horseracing enterprise. Together, Crosby and O'Brien were able to raise the funds to complete the necessary construction for the Racetrack; however, the design of the buildings was scaled back. The Turf Club opened to the public on July 3, 1937, with Crosby himself greeting the first guests through the turnstiles. Crosby's passion for the Racetrack he began was even commemorated in the lyrics of a song, as he sang:

Where the surf meets the turf,
Down at old Del Mar,
Take a plane, take a train, take a car...
There's a smile on every face,
And a winner in each race,
Where the turf meets the surf at Del Mar.
(Murray 2003:19, Ewing 1988:200, 202)

The tune ultimately became the official anthem of the Racetrack and is still played today at the beginning and end of each racing day.

The opening of the Turf Club marked the beginning of a change in the small seaside community of Del Mar. Throughout the 1930s and early 1940s, countless celebrities flocked to the quiet seaside community to enjoy the races and the town's relaxed atmosphere. Other regulars at Del Mar included Jimmy Durante, Douglas Fairbanks, Mickey Rooney, W.C. Fields, Dorothy Lamour, and Ann Miller. Durante was also an ardent fan of Horseracing and a mainstay in Del Mar until his death in 1980. So

loved was the entertainer that in 1963 he was declared the honorary mayor of Del Mar, and the street on which the Fairgrounds are located was renamed Jimmy Durante Boulevard.

During World War II, the activities at the Fair were temporarily suspended. Instead of hosting Race Meets and Fairs, the Fairgrounds were used as a training facility and temporary quarters for military personnel. The horse stalls became temporary housing for paratroopers who trained on nearby beaches. A Marine Corps detachment from Camp Pendleton also used the facility. Some 500,000 sf of space was transformed into assembly lines to manufacture wing ribs for the production of Douglas B-17 bomber planes. A tin barn structure on the proposed fire station site may have been used for storage related to the loading and off loading of trains in support of the military use of the Fairgrounds. The Fair was reopened to the public in 1946, and the expansion of the Fairgrounds commenced following the end of the war.

In 1951, Bing Crosby Hall was built, commemorating the actor's long relationship with the Turf Club and Fairgrounds. Architect Harry Hayden Whiteley was commissioned to design the large exhibit building. Whiteley designed a number of residential buildings throughout Los Angeles and San Diego Counties between the 1920s and the 1950s. Shortly after building Bing Crosby Hall, Whiteley moved to Las Vegas, where he continued to work, designing public buildings for local municipalities such as schools, hospitals, and jails.

Also during the 1950s, several new additions were made to the Fairgrounds, including the Stable Dining Hall and Office (1950s), additional stables (1950s), the Clock Tower Building (1953), the Exhibit Hall (1955), and several maintenance buildings (ca. 1950s). In contrast to the first buildings erected at the Fairgrounds, most of these buildings were constructed in very simple and utilitarian design. A notable exception was the Clock Tower Building, which was designed in the Googie style that became popular during the 1950s and 1960s.

During this time, the 22nd DAA embarked on a promotional campaign to attract people to the Fair and the Racetrack. Its campaign was inspired by Don Diego Alvarado, a ranchero from California's Mexican period, who was locally recognized for his renowned hospitality. In 1834, Alvarado was granted the 8,400 ac Los Penasquitos Rancho by the Mexican Governor of California, which included the town of Del Mar. The 22nd DAA utilized the stories of Alvarado to create its own character, who promoted the Fairgrounds each year and greeted the guests with "Bienvenidos, Amigos."

Del Mar's Don Diego would remain the most-recognized symbol of the County Fair for four decades. In 1954, a tile likeness of Don Diego was constructed on the facade of the Clock Tower along the main Fair avenue. In 1985, a 16 ft statue of Don Diego was placed at the front entrance to the Fair.

Throughout the 1950s and 1960s, Del Mar continued to be a playground for celebrities who purchased oceanfront homes and attended the races daily to watch their horses compete. Countless stories exist detailing the exploits of Hollywood stars such as Gregory Peck, Lucille Ball, and Desi Arnaz.

By the 1960s, the Fairgrounds returned to their prewar success, scoring record attendance. In 1963, the D. Robert Jones Administration Building was constructed. By 1964, the Fairgrounds property was expanded to include an additional 57.2 ac located east of the original property. Jimmy Durante Boulevard was constructed, which wrapped around the property's new eastern boundary. No new

buildings were constructed on the property addition; it was used for parking. Also by 1964, the Exhibit Hall had been constructed, as well as the maintenance buildings and additional stables.

In 1970, the Del Mar Thoroughbred Club took over racing operations for the Turf Club. Since the 1970s, the Fairgrounds have undergone many alterations. The first major renovation occurred between 1972 and 1978 at a cost of \$2.5 million. During this effort, alterations and upgrades were made, including the addition of several ancillary buildings, improvements to the Grandstands, and the addition of the Del Mar Thoroughbred Club offices. However, it was reported that the improvements did not alter the Spanish Colonial characteristics of the original buildings.

Additional renovations and improvements followed during the 1980s. Longtime Turf Club member and Del Mar resident Pat O'Brien was recognized for his commitment to the community, and in 1980, the new exhibition hall was named after him. Also during the 1980s, a smaller training track known as the Stephens Track was constructed to the northwest of the Racetrack. In 1989, the historic Alvarado House was moved to the Fairgrounds. This modest one-story Folk Victorian residence was built in 1885 by Jacob Taylor and sold the same year to Don Diego. During the 1980s, the property where the house was originally located was sold to developers, and the house was donated to the historical society and moved to the Fairgrounds.

During the 1990s, the Fairgrounds underwent the most extensive improvements to date. In 1991, the Fairgrounds were expanded to include the new Surfside Race Place, an off-track wagering facility that offers satellite Horseracing. The Infield Pavilion, located in the Racetrack infield, was added in 1991. Between 1992 and 1993, an \$80-million renovation was completed that replaced the original Spanish Colonial Grandstands with the new modern Grandstands, constructed in a contemporary interpretation of the Mission Revival Style.

The two most recent buildings, Wyland Hall and Expo Center, were completed in June 2006. These two buildings are located east of the Grandstands, next to the Racetrack. The east wall of Wyland Hall has a mural depicting gray whales at sunset that was painted by the famed marine-life artist Wyland at the 2006 San Diego County Fair. This mural is visible from nearby I-5.

Since the 1970s, numerous improvements have occurred that have gradually altered the character of the Fairgrounds from their original 1930s design. Aerial photographs of the property taken during the last four decades clearly show the evolution of the Fairgrounds. Additional land was acquired to facilitate additional expansions, bringing the total of the property to approximately 300 ac. Most of the original adobe-style Fairgrounds buildings from the 1930s were torn down and replaced, including the Grandstands, maintenance sheds, exhibit buildings, and offices. There are five remaining buildings and features that were constructed during the Fairgrounds' period of significance (1936–1956). However, the large modern buildings constructed post-1970s dominate the Fairgrounds setting.

4.7.3 Regulatory Setting

This assessment addresses the requirements of the California Environmental Quality Act (CEQA) Public Resources Code (PRC), Division 13 (Environmental Quality), Chapter 2.6 Section 21083.2 (Archaeological resources) and Section 21084.1 (Historical resources); and the Guidelines for CEQA,

California Code of Regulations (CCR) Title 14, Chapter 3, Article 5 Section 15064.5 (Determining the Significance of Impacts on Historical and Unique Archaeological Resources).

Significance criteria for effects to cultural resources were developed based on a resource's eligibility for listing in the California Register. A cultural resource is determined to be significant based on criteria defined by CEQA. Substantial adverse change in the significance of such a resource is defined as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, such that the significance of the historic and/or archaeological resource would be materially impaired.

The criteria for listing resources on the California Register are based on those developed by the National Park Service for listing in the National Register. The federal criteria have been modified in order to include a broader range of resources that better reflect the history of California. A property must be significant at the local, State, or national level under one or more of the following four criteria:

1. It is associated with events or patterns of events that have made a significant contribution to the broad patterns of the history and cultural heritage of California and the United States.
2. It is associated with the lives of persons important to the nation or to California's past.
3. It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.
4. It has yielded, or may be likely to yield, information important to the prehistory or history of the State and the nation.

Significant nonrenewable paleontological resources, including vertebrate fossils and unique or scientifically important invertebrate fossils and remains of fossil plants, are recognized by CEQA. For paleontological resources, the physical disturbance of the strata in which the resources are located represents a direct physical effect; changes in surface conditions that do not disturb subsurface resources would not be a direct effect.

4.7.4 Methodology

Historic Resources. A records search was completed at the SCIC of the California Historic Resources Information System, located at San Diego State University; it included a review of all recorded archaeological sites and architectural resources within a 0.5 mi radius of the project area, as well as a review of known cultural resource survey and excavation reports. In addition, the National Register; California Register; and the California State HRI, which includes the California Historical Landmarks, California Points of Historical Interest, and various local historic registers, were examined. The Historic Properties Directory (2006) maintained by the State Office of Historic Preservation was also consulted.

A field survey of potential historic resources of the project area was conducted on August 24, 2006. The purpose of this survey was to identify and photograph any historic resources that may be impacted by proposed development within the property. The field survey consisted of a visual

inspection of all features of the property, including buildings, structures, and associated features. In addition, any previously recorded historic-period resources were resurveyed.

Cultural Resources. A records search was completed at the SCIC, located at San Diego State University, in May 2006; it included a review of all recorded historic and prehistoric archaeological sites within a 0.5 mi radius of the project area, as well as a review of known cultural resource survey and excavation reports. In addition, the California State HRI, which includes the California Historical Landmarks, California Points of Historical Interest, and various local historic registers, was examined.

As mentioned above, a pedestrian survey of potential archaeological resources was conducted on June 12, 19, and 26, 2006. In addition, a survey of the proposed fire station site was conducted on March 6, 2008. The survey methodology was based on the nature of expected historic resources and known archaeological characteristics. Much of the approximately 300 ac project area is occupied by standing structures and a paved parking lot. These developed areas substantially reduced the acreage that could be physically surveyed; however, those areas that were not developed were surveyed in parallel transects spaced approximately 15 meters (m) apart, and the developed areas were surveyed by examining areas of exposed soil such as landscape areas. Previously documented resources were field-checked for locational and elemental accuracy, and site record updates were completed on California DPR series 523 forms for sites extending into the project area. Sites were plotted using a Garmin Etrex handheld GPS unit with accuracy to 3 m in concert with high-resolution aerial photographs.

Native American consultation was conducted for the project. A Sacred Lands File search was requested of the Native American Heritage Commission (NAHC) by letter on May 22, 2006. In a response dated May 30, 2006, the NAHC stated that the search failed to indicate the presence of Native American cultural resources in the project area and recommended that 27 tribes or individuals who may have knowledge of the project area be contacted. Letters were sent dated June 14, 2006, by certified mail to each of these tribes/individuals. The letters included a brief project description and map showing the project location and requested input regarding the presence of cultural resources in the project area. As a result of communication with the tribes and individuals, an on-site meeting was held with representatives of the Santa Ysabel Band of Diegueño Indians. In addition, the Borona Group of the Capitan Grande stated that the tribe was unaware of the existence of cultural resources in the project area but requested notification in the event that cultural remains are discovered. Additional information regarding the Native American consultation is provided later in this section of the EIR and in the Cultural Resources Assessment in Appendix D of this EIR.

Paleontological Resources. A paleontological locality search was conducted through the San Diego Natural History Museum, and geological references and paleontological records maintained at LSA were also consulted. It included a review of the area geology, any known paleontological resources recovered from the surrounding area, and the geologic formations that will likely be encountered during excavation activities. The purpose of the locality search was to establish the status and extent of previously recorded paleontological resources within and adjacent to the project area. With this knowledge, an informed assessment of the potential effects of the proposed project on paleontological

resources could be made, allowing an evaluation of the types of fossils that might be uncovered during ground-disturbing activities.

A pedestrian survey of potential paleontological resources was conducted by LSA archaeologist Phil Fulton on June 12, 19, and 26, 2006. The survey consisted of a visual inspection of exposed soil and ground surfaces. The purpose of this survey was to identify any paleontological resources that may be impacted by the proposed project. In this way, paleontological remains, if any were present, could be documented and collected prior to the beginning of additional ground-disturbing activities and locate areas within the project area that might contain abundant remains that had not previously been located.

4.7.5 Impact Significance Criteria

For this project, the following thresholds of significance are used. The effects of the proposed project to cultural resources may be considered to be significant if the proposed project would:

- Threshold 4.7.1** **Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.**
- Threshold 4.7.2** **Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.**
- Threshold 4.7.3** **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.**
- Threshold 4.7.4** **Disturb any human remains, including those interred outside of formal cemeteries.**

4.7.6 Project Impacts

- Threshold 4.7.1** **Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.**

Near-Term Project Impact Analysis. A review of the records indicated that none of the resources at the project site are eligible for listing in the National Register or California Register, or are designated as California Historical Landmarks or California Points of Historical Interest. In addition, no resources in the project area are listed in the Historic Properties Directory (2006). Seventy-four cultural resources studies were previously conducted within 0.5 mi of the project boundaries. Approximately 10 of these studies included the Fairgrounds, but none of these reported positive findings for architectural resources.

During the field survey, 17 of the Fairgrounds buildings were determined to be 50 years or older and were recorded and evaluated for significance within the context of a potential historic district. A historic district is defined as a concentration of buildings, structures, or objects united historically or aesthetically by plan or development. Of these buildings, five were determined to be contributing features to a potential district: Bing Crosby Hall (1951), the Clock Tower (1953), Exhibit Hall (1955),

the Racetrack (1936), and the Stables and Living Quarters Complex (1936–present). While some of these buildings (the Clock Tower building, which represents a fairly intact example of the Googie style of architecture, and the Stables and Living Quarters Complex, which represents one of the earliest features of the Fairgrounds) merit consideration during the local planning process, it was determined the project site did not meet eligibility as a historic district for the National Register or California Register criteria and therefore does not constitute a historical resource under CEQA or a historic property under Section 106. Although not eligible for designation, the Clock Tower Building represents a fairly intact example of the Googie style, and the Stables/Living Quarters Complex represents one of the earliest features of the Fairgrounds. Individually, most of the buildings and features on the Fairgrounds are of simple construction and do not represent the work of a master, nor do they possess high artistic value. Most of the buildings have been substantially altered or were constructed or moved onto the property outside of the period of significance. Although the Racetrack and stables are associated with the WPA, they have been substantially altered since their construction and no longer retain integrity. Further, they are utilitarian in design and are merely remnants of a larger WPA project.

The near-term projects include demolition of existing Bing Crosby Hall, the Clock Tower, and Exhibit Hall. The Clock Tower is proposed to be demolished for construction of the hotel complex; however, elements (i.e., decorative tiles) will be retained and used on site, Bing Crosby Hall and Exhibit Hall are proposed to be demolished for a new, larger, and more modern exhibit building with three rooftop sports fields and parking below. As stated above, none of these buildings or structures meets the criteria for listing in the National Register or California Register, and they are not considered to be significant historic resources under CEQA or historic properties under Section 106. Therefore, the project will not cause a significant adverse change to historic resources or historic properties on site, and no mitigation is required. Construction of the proposed near-term projects in phases as described in Chapter 3.0, Project Description, of this EIR would not alter this conclusion. Also, the 22nd DAA has committed to retaining decorative tile from the Clock Tower to be reused on site, also described in Chapter 3.0, Project Description.

Long-Term Project Impact Analysis. The proposed long-term projects affect the same project site as the near-term projects. While the long-term projects include improvement of the existing Backstretch Area, including rebuilding stables and temporary living quarters, construction of a Horseman’s Village, a new truck tunnel, vehicle wash rack, and a multilevel parking structure, and enhancing transit access with the provision of a seasonal train platform, as stated above, there are no significant historic resources at the Fairgrounds. Therefore, the proposed long-term projects would not result in significant adverse change to historic resources on site, and no mitigation is required.

Threshold 4.7.2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.

Near-Term Project Impact Analysis. As stated above, an archival records search and archaeological field survey was performed for the project site. The records search revealed 38 archaeological sites within 0.5 mi radius of the project site; however, none of these sites were located on the Fairgrounds. In addition, field surveys were conducted for the proposed project area. The survey scope required all resources greater than 45 years in age within the survey area to be identified, even if very small

(fewer than five artifacts or features). Since subsurface excavations were not proposed as part of this study, observation of the subsurface was limited to stream bank exposures along the San Dieguito River, cut banks, and rodent burrows. The field surveys did not discover additional resources on the project site.

As mentioned above, Native American consultation was also conducted for the project. A Sacred Lands File search was requested of the Native American Heritage Commission (NAHC) by letter on May 22, 2006. In a response dated May 30, 2006, the NAHC stated that the search failed to indicate the presence of Native American cultural resources in the project area and recommended that 27 tribes or individuals who may have knowledge of the project area be contacted. Letters were sent dated June 14, 2006, by certified mail to each of these tribes/individuals, and if no response was received by June 23, 2006, follow-up phone calls were made to ensure that all input was included.

Letter responses were received from two of the parties contacted. The Barona Group of the Capitan Grande stated that the tribe was unaware of the existence of cultural resources in the project area but requested notification in the event that cultural remains are discovered. The Santa Ysabel Band of Diegueño Indians stated that the tribe was aware of cultural resources near the project area and requested an on-site meeting where avoidance and treatment measures were discussed for two previously recorded sites on the property. However, since the known archeological sites were outside the Fairgrounds project site, the avoidance and treatment measures discussed at the meeting are not required with implementation of the project.

For the remaining tribes/individuals originally contacted by letter, two to three rounds of follow-up telephone calls were also made to ensure that input was obtained. These calls were made between June 29 and July 31, 2006. Five parties were contacted, none of whom had concerns about the project. Messages were left for the remaining Native Americans, with the exception of the Sycuan Band of Mission Indians. Three attempts to contact the Sycuan Band of Mission Indians by telephone were made, but there was no answer or voicemail to leave a message. Complete documentation of the Native American Consultation is available in Appendix D of this EIR in the *Cultural Resource Assessment* (LSA Associates, Inc., October 2006).

While no sensitive cultural resources will be impacted by the proposed project, much of the project site consists of reclaimed "swampland" covered with imported fill that is not sensitive to cultural resources. Implementation of the proposed project restricted to the areas of fill will not require mitigation; however, buried intact soil deposits in the remaining project area may contain resources that have not yet been identified during record searches and field surveys examinations of the property. A potentially significant impact could occur if archaeological resources are encountered in these soil deposits during implementation of the proposed project; therefore, Mitigation Measure 4.7.1 is required. Mitigation Measure 4.7.1 would require the California Construction Authority to retain an archaeologist on call during all grading and other significant ground-disturbing activities that extend into intact native sediments. Implementation of Mitigation Measure 4.7.1 will provide the necessary protection to unknown archaeological resources and reduce any potential impacts to less than significant levels.

Long-Term Project Impact Analysis. The proposed long-term projects affect the same project site as the near-term projects, and, as stated earlier, no known sensitive cultural resources, including

archaeological resources, have been identified on-site. Therefore, the construction of long-term projects such as the seasonal train platform, multilevel parking structure, improvements to the Backstretch Area, new Horseman's Village, vehicle wash rack, and new truck tunnel will not result in impacts to known archaeological resources, and the proposed long-term project would not cause a substantial adverse change in significance of an archaeological resource. However, precautionary measures have been identified to address any potentially significant impact that could occur if unknown archaeological resources are encountered in soil deposits. Mitigation Measures 4.7.1 through 4.7.3 are required for the long-term projects (Strategy 4.7.1). Implementation of Mitigation Measure 4.7.1 will provide the necessary protection to unknown archaeological resources and reduce any potential impacts to less than significant levels.

Threshold 4.7.3 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Near-Term Project Impact Analysis. A pedestrian field study and paleontological locality search was conducted for the proposed Master Plan projects. The pedestrian field surveys did not identify paleontological resources on the project site during the survey. The paleontological locality search revealed that the existing project area is underlain by sediments of the Eocene Torrey Sandstone, Pleistocene Bay Point Formation, Quaternary Alluvium and slope wash, artificial fill, and possibly Pleistocene Alluvium at depth. The Eocene Torrey Sandstone has a moderate sensitivity and the Pleistocene Bay Point Formation has a high paleontological sensitivity for producing fossils; however, the Torrey Sandstone and the Bay Point Formation have both produced fossils near the project area (although no localities are recorded within the project limits). Surficial alluvium and slope wash, like that within the project, is considered too young to contain fossils; however, fossils have been recovered from deeply buried alluvium. Furthermore, any fossils contained in artificial fill would be out of context and not significant.

While no paleontological resources were discovered within the Fairgrounds during the pedestrian field survey and locality search, the locality search did identify formations within the property that could be sensitive for buried paleontological resources; therefore, mitigation is required to address the potentially significant impact that could occur if paleontological resources exist. Mitigation Measure 4.7.2 would require the California Construction Authority to retain a paleontologist prior to issuing the notice to proceed. The paleontologist will monitor all grading and other significant ground-disturbing activities that may encounter Torrey Sandstone, the Bay Point Formation, or deeply buried Pleistocene alluvial sediments on a full-time basis for paleontological resources. In addition, the paleontologist will provide on-call services in the event that resources are discovered at shallower depths. Implementation of Mitigation Measure 4.7.2 would provide the required monitoring to reduce any potential impacts to unknown paleontological resources to less than significant levels.

Long-Term Project Impact Analysis. The proposed long-term projects affect the same project site as the near-term projects, and, as stated above, no paleontological resources have been found on the project site. However, there are formations within the property that could contain sensitive buried paleontological resources; therefore, mitigation is required to address the potentially significant impact that could occur if paleontological resources exist. Mitigation Measure 4.7.2 is required to address the potentially significant impact that could occur if paleontological resources are

encountered in the sensitive formations identified in the locality search and to reduce potential impacts to less than significant levels (Strategy 4.7.1).

Threshold 4.7.4 Disturb any human remains, including those interred outside of formal cemeteries.

Near-Term Project Impact Analysis. No known human remains are present on site, and no facts or evidence exist to support the idea that Native Americans or people of European descent are buried on site. However, as described above, buried and undiscovered archaeological remains, including human remains, may be present below the ground surface. In the unlikely event that human remains are encountered during project grading, the proper authorities would be notified and standard procedures would be adhered to as described in Mitigation Measure 4.7.3. Implementation of Mitigation Measure 4.7.3 would reduce potential project impacts related to discovery of human remains to a less than significant level.

Long-Term Project Impact Analysis. No known human remains are present on site, and no facts or evidence exist to support the idea that Native Americans or people of European descent are buried on site. The proposed long-term projects affect the same project site as the near-term projects, and, as stated above, Mitigation Measure 4.7.3 will be required of the long-term projects to provide the standard procedures to reduce the impact to a less than significant level.

4.7.7 Cumulative Impacts

The cumulative impact area for cultural and paleontological resources is the County of San Diego and the Southern California region. The proposed project will not impact any known archaeological, historical, or paleontological resources on the project site. However, the possibility of discovering unknown archaeological or paleontological resources on the project site cannot be ruled out. Therefore, in conjunction with other past, present, or reasonably foreseeable future projects, the proposed project has the potential to result in a cumulative impact due to the loss of undiscovered archaeological and paleontological resources during grading and construction activities. With implementation of Mitigation Measures 4.7.1 through 4.7.3, the proposed project's incremental contribution to impacts to unknown archaeological and paleontological resources will be reduced to below a level of significance.

4.7.8 Level of Significance Prior to Mitigation

No historical resources, archaeological resources, paleontological resource, or human remains have been identified on the project site. However, the possibility exists that unknown buried archaeological or paleontological resources may be uncovered during grading or construction activities. In addition, although unlikely, human remains may be present below ground surface.

4.7.9 Mitigation Measures

Mitigation Measure 4.7.1

Prior to issuance of any notice to proceed, the California Construction Authority (CCA) shall oversee implementation of a grading, monitoring, and data recovery program to mitigate potential impacts to undiscovered buried archaeological resources on the Fairgrounds and fire station site. This program shall include, but shall not be limited to, the following actions:

- a. Provide evidence that a consulting archaeologist with supervisory level experience has been retained to implement a grading, monitoring, and data recovery program. A letter from the consulting archaeologist shall be submitted to the CCA. The letter shall include the following guidelines, which shall also be noted on all grading plans:
 - i. The consulting archaeologist/historian shall attend the pregrading meeting with the contractors to explain and coordinate the requirements of the monitoring program.
 - ii. The project archaeologist shall monitor all areas identified for development, including off-site improvements.
 - iii. An adequate number of monitors shall be present to ensure that all earth-moving activities are observed and shall be on site during all grading activities for all areas to be monitored.
 - iv. During the original cutting of previously undisturbed deposits, the archaeological monitor(s) shall be on site as determined by the Principal Investigator of the excavations. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist. Monitoring of cutting of previously disturbed deposits will be determined by the Project Archaeologist.
 - v. In the event that previously unidentified potentially significant cultural resources are discovered, the Project Archaeologist shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The Principal Investigator shall contact the California Construction Authority at the time of discovery. The Principal Investigator, in consultation with the California Construction Authority, shall determine the significance of the discovered resources. The California Construction Authority must concur with the evaluation

before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the Principal Investigator and approved by the California Construction Authority, then carried out using professional archaeological methods.

- vi. In the event that previously unidentified cultural resources are discovered, all cultural material collected during the grading monitoring program shall be processed and curated at a San Diego facility that meets federal standards per 36 Code of Federal Regulations (CFR) Part 79, and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be timely and transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.
- vii. In the event that previously unidentified cultural resources are discovered, a report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the California Construction Authority prior to the issuance of a notice to proceed on building construction. The report shall include Department of Parks and Recreation (DPR) Primary and Archaeological Site forms.
- viii. In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the California Construction Authority by the Principal Investigator once grading monitoring activities have been completed.

Mitigation Measure 4.7.2 Prior to issuance of a notice to proceed, the California Construction Authority shall retain a paleontologist. The letter shall state that the applicant has retained this consultant, that the consultant shall be present at the pregrade conference, and that the consultant will monitor all grading and other significant ground-disturbing activities within areas mapped as the Torrey Sandstone, the Bay Point Formation, or Pleistocene Alluvium beginning at the surface. For areas mapped as Holocene (less than 10,000 years) Alluvium, monitoring will not be required until a depth of 5 feet (ft) below the surface has been reached. Once a depth of 5 ft has been reached in Holocene Alluvium, spot monitoring should begin to determine what sediments are being

encountered. If the spot monitoring indicates that the sediments are still Holocene Alluvium, spot-monitoring can continue. If during the spot monitoring either Torrey Sandstone, the Bay Point Formation, or deeply buried Pleistocene alluvial sediments are encountered, monitoring shall begin on a full-time basis, in those areas, for paleontological resources. In addition, the consultant shall provide on-call services in the event that resources are discovered at shallower depths.

Mitigation Measure 4.7.3 In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps shall be taken:

- a. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the San Diego County Coroner is contacted to determine whether the remains are prehistoric and that no investigation of the cause of death is required. If the coroner determines the remains to be Native American, then the coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the Most Likely Descendant (MLD) from the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code (PRC) Section 5097.98, or
- b. Where the following conditions occur, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD or on the property in a location not subject to further subsurface disturbance:
 - i. The NAHC is unable to identify an MLD, or the MLD failed to make a recommendation within 48 hours after being notified by the commission.
 - ii. The identified MLD fails to make a recommendation.
 - iii. The landowner or his/her authorized representative rejects the recommendation of the MLD, and mediation by the NAHC fails to provide measures acceptable to the landowner.

4.7.10 Programmatic Impact Avoidance and Mitigation Strategies

The mitigation measures described above are based on cultural and paleontological investigations of the project site as documented in Appendices D, E, and F of this EIR. The investigations were site specific and the recommendations are applicable to both the near-term and long-term projects. Application of the mitigation measures described above to the long-term projects as well as the near-

term projects reduces all potentially significant impacts to cultural and paleontological resources to below a level of significance. Therefore, the following programmatic impact avoidance and mitigation strategy for long-term projects is required.

Strategy 4.7.1 The 22nd District Agricultural Association (DAA) shall ensure implementation of measures to reduce cultural and paleontological impacts, including but not limited to implementation of Mitigation Measures 4.7.1 through 4.7.3, described above.

4.7.11 Level of Significance after Mitigation

The mitigation measures above would reduce potentially significant impacts related to cultural and paleontological resources to a less than significant level.

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