

Historical Evaluation
of
Proposed Bulbout



at

First Street West & West Napa Street
Sonoma, California



Introduction

This section describes the intersection of West Napa Street and First Street West; for context it also describes the other four intersections at the edges of Sonoma Plaza. Then it recaps the historical designations which include the location of the proposed mitigation measure, relating the description they provide of streets and sidewalks, along with statements in the designation forms about the significance of streets and sidewalks. The relevant guidance found in National Park Service publications which guide application of the Secretary of the Interior's Standards for the Treatment of Historic Properties are then presented, along with some examples of how other publications and jurisdictions have approached the construction of bulbouts in historic districts. The assessment of conformance with the Secretary's Standards and impact under the CEQA Guidelines complete this section.

Sonoma Plaza is a National Historic Landmark and a historic district listed in the National Register of Historic Places. This means it is a historical resource for the purposes of CEQA, and the bulbouts must be evaluated to see whether they would cause a significant impact on it. The official designations of the District do not mention its sidewalks, curbs, street paving, or traffic lanes as important elements in its history or significance. They do describe the street grid with the Plaza at its center as highly important. The CEQA Guidelines say that a project which conforms to the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards) has a less than significant impact. The National Park Service's Guidelines for Cultural Landscapes discourage construction of "neck outs" in historic roads. Therefore, it cannot be assumed that building the bulbouts would conform to the Secretary's Standards—even though some historical references say they have been constructed appropriately in other historic districts. The CEQA Guidelines also set forth an evaluation procedure under which a project is classified as not having a significant impact if it does not adversely alter the physical elements which convey the significance of a historic property. Construction of the bulbouts would alter sidewalks, curb lines, street pavement, and traffic lanes—features which play a tiny role at most in the historical significance of the Plaza and the District. These are not the features which convey the significance of the historical resource. The bulbouts would not cause an adverse change in those features which do convey the significance of the District—the street grid and the spatial character of the Plaza. For this reason, the bulbouts would not cause an adverse change to the traits that convey the significance of the District, and therefore they would cause a less than significant impact on historical resources under CEQA.

Description of Existing Intersections

Spain Street, Napa Street, and First Streets East and West form the four sides of Sonoma Plaza; Broadway runs south from Napa Street at the midpoint of the south side of the Plaza. (In this section, the word "Plaza" refers to the open space bounded by Spain, Napa, and First Streets East and West.) There are thus five intersections along the perimeter of the Plaza. Although there is a slight slope down from north to south, it is so gradual that the Plaza and intersections appear nearly flat. Sidewalks line all four sides of the Plaza (in addition to a network of paved footpaths within the Plaza); the sidewalks on the south and east sides begin at the curb, while those on the north and west sides are separated by grass strips from the curbs. The sidewalks are paved with concrete and the streets with asphalt. On the sides of the streets opposite the Plaza, there are sidewalks from the curbs to the building property lines. The

sidewalks generally have curb cuts and ramps at intersections, though this document does not include accessibility information and no detailed survey was performed.

Broadway and the blocks on the four sides of the Plaza are wider than the streets in the eight blocks of the grid that extend from the four corners of the Plaza. The intersections and crosswalks at the four corners of the Plaza therefore are not square, but instead form trapezoids. There is angled parking on both sides of the four blocks that border the Plaza, except West Napa Street, which has parallel parking on both sides, as do the nine blocks adjoining the Plaza. State Hwy. 12 from Schellville runs along Broadway to the Plaza, where it turns west on Napa Street.



Napa Street and Broadway, looking west.

1. Napa Street and Broadway

Broadway ends at Napa Street, which forms the southern border of Sonoma Plaza. Napa Street changes from East Napa Street to West Napa Street at Broadway. Broadway and West Napa Street both have two travel lanes each way. West Napa Street has a dedicated right turn lane, and Broadway has a dedicated left turn lane. East Napa Street has only one travel lane each way. Opposite Broadway are the vehicle entry and exit lanes of the Plaza with a broad grass median between. A mission bell on its distinctive curved pole stands at the center of the median, on the sidewalk. Broadway has a narrow central median created by two sets of double yellow lines. All four entries to the intersection have stop signs. All corners have crosswalks, and each lane into and out of Sonoma Plaza also has a crosswalk. These crosswalks are marked only by a single line on each side. Mid-block between Broadway and 1st Street West on the north side of West Napa Street there is a large tree located roughly at the edge between the parking lane and the northern westbound traffic lane, enclosed by concrete curbs.

2. West Napa Street and 1st Street West

West Napa Street has through traffic with no stops both ways at 1st Street West, with two lanes each way east of 1st Street West and one lane each way west of the intersection. First Street West is one lane only each way. Both 1st Street entries are right-turn-only at West Napa Street, indicated by lane arrows and signs, and a row of flexible plastic pylons direct



First Street West, looking north at West Napa Street .

the traffic into the turn. Just east of the intersection, there is a small traffic island of about 4' x 8' between the westbound lanes of West Napa Street that directs the right lane to turn right. Crosswalks are located at all four corners, but the crosswalk from the northeast corner crosses to the traffic island rather than the opposite corner. The mid-block area of 1st Street West has dedicated commercial loading zones in the middle of the street. These are also found on East Spain Street and 1st Street East along the edge of Sonoma Plaza.



First Street West and West Spain Street, looking

3. West Spain Street and 1st Street West

Both streets have one lane each way. This intersection is a four-way stop. There are crosswalks from each corner. The crosswalks at this intersection only have parallel lines perpendicular to the length of the crosswalks, without the lengthwise enclosing lines found at the other intersections.

4. East Spain Street and 1st Street East

Both streets have one traffic lane in each direction, with stop signs at both streets in both directions. There are crosswalks on all four sides of the intersection. There is a sidewalk bulbout on the southwest corner of this intersection helping to form the angle-in parking along the 1st Street East side of Sonoma Plaza. Mission San Francisco Solano stands on the northeast corner of this intersection.

5. East Napa Street and 1st Street East

Both streets have one lane of travel in each direction; this intersection is also a four-way stop. There are crosswalks on all four sides of the intersection.



East Spain Street and First Street East, looking east (above, left) and East Napa Street and First Street East, looking north (above, right).

Historical Designations and Significance

There are four different existing historical designations which encompass the proposed project area: the Sonoma Plaza National Historic Monument, the Sonoma Plaza National Register District, the Valley of the Moon Survey, and the Sonoma Overlay District. The intersection at which the proposed work would occur is not individually listed as a historical resource, nor is it mentioned in these listings, but there are descriptions of the urban development pattern, street layout, and streetscapes which provide the basis on which to understand the historical significance of the existing intersection. In addition, the 2007 Downtown Guidelines, which indicate the Town's attitude toward treatment of the streets, reflect its concepts for historic preservation along with other urban design considerations.

National Historic Landmark

The National Historic Landmark nomination form of 1963, updated in 1974, devotes some detail to urban design. The section "Present Appearance"¹ states, "Sonoma Plaza, with the buildings surrounding the square, is one of the best preserved areas of the Mexican period in California." The nomination goes on to describe the Plaza, the Sonoma Barracks facing it, Gen. Vallejo's town house next to the barracks, the Blue Wing Inn, and the Mission. Then it describes buildings around the Plaza and nearby ranging as far from the Plaza as the Casa Grande, but no streets or landscapes.²

The description of Spain Street between First Street East and Second Street East says its inclusion in the boundaries is "essential to protect the historic setting of the Mission and Blue Wing Inn and also to protect sites which may provide information and artifacts through historic archeology." There is no physical description of this area, nor any mention of landscape, streetscape, etc., however.

The National Historic Landmark nomination clearly takes into account the street grid, Plaza, and relationship among the buildings and this urban framework. It does not describe the street paving, sidewalks, circulation pattern, signage, or parking.

Sonoma National Register District (1992 Boundary Increase)

The National Historic Landmark nomination was originally prepared very early in the modern historic preservation movement—before adoption of the seminal 1966 National Historic Preservation Act (NHPA). The NHPA provided an important framework for researching, assessing, and documenting historically significant properties and delegated influential oversight to the National Park Service and the Advisory Council for Historic Preservation. Following adoption of the NHPA, the requirements and format for National Register and National Historic Landmark nominations became much more detailed and systematized than they previously had been. Noting the relatively sparse documentation of the Sonoma Plaza National Landmark nomination, the National Park Service augmented it in 1992 with a separate—but closely related—National Register nomination. Although this document focuses primarily on buildings, it provides additional information about the streets.

The nomination form describes the district's flat topography, trees, and "very bucolic atmosphere although the buildings facing the Plaza are primarily commercial. The tangential side streets, which are primarily residential, are also lined with tall mature trees furthering this

¹ National Historic Landmark nomination, page 2.

² Ibid. Page 3.

atmosphere...The district in its past had the look of a small country town center. It essentially still retains that character.”³ The nomination contains a description of the Plaza, originally fenced and “essentially a simple, open area with little or no vegetation, sometimes used for cattle grazing” as well as drilling for Mexican troops and horse-racing. It describes 20th century landscaping and planting of the Plaza “into a park-like space.”⁴

Some properties are described as having detached outbuildings, but the description mentions only the outbuildings and their locations, without describing the landscape between the buildings. There is little mention of the streets themselves. The description of Property No. 52, 220 East Spain Street, describes the 1911 bungalow and mentions “At the front of the property between the sidewalk and front lawn is a low rock-faced random laid stone retaining wall. This locally quarried stone is the same used for other stone buildings, trim, and sidewalks in other parts of the district.”⁵

The significance section of the nomination states, “It is significant in town planning because it was the last town in North America designed under the Laws of the Indies and still retains its integrity to that plan...with the size and location of the Plaza, orientation of the buildings, and the grid pattern of streets surrounding the Plaza.”⁶ The nomination cites other colonial Spanish towns in the U.S. laid out under the Laws of the Indies and comments that “Sonoma retains its original plan integrity with the size of the Plaza, street layout, and arrangement of buildings.” In contrast to Sonoma, San Juan Bautista does not have streets surrounding the plaza on all four sides, they do not extend in all four directions, and the grid is located west of the Mission.⁷ Sonoma is notable for having streets on all four sides of its plaza, with an orthogonal street grid emanating in all four directions, the nomination says, and “The arrangement of the Plaza and the street pattern still remain virtually intact.”⁸

Valley of the Moon Survey

The 1979 Valley of the Moon Survey included more than 700 properties in the City of Sonoma and in Sonoma Valley outside the city, and was updated in 1998.⁹ The survey consists primarily of buildings. It lists three vacant lots/open spaces, one of which is the Plaza. The survey does not describe the streets, sidewalks, street grid, or traffic patterns.

Overlay Zone

Chapter 19.42 of the Sonoma Municipal Code sets forth regulations and guidelines for the Historic Overlay Zone, which includes the Plaza and the central part of the city (including the project site). The overlay zone regulations do not describe streets, landscapes, or streetscapes—or provide requirements for treatment of them.

Downtown Guidelines 2007 Page Turnbull

In addition to the listings described above, the City of Sonoma has adopted the *Sonoma Historic Preservation Design Guidelines 3/8/2017* which provide guidelines for appropriate construction and alteration designs in the Downtown Planning District.

³ 1992 National Register District, nomination form. Section 7, Page 4.

⁴ Ibid. Pages 4-5.

⁵ Ibid. Section 7, property descriptions.

⁶ Ibid. Section 8, Page 23.

⁷ Ibid. Section 8, Page 29.

⁸ Ibid. Section 8, Page 30.

⁹ <http://sonomaleague.org/page57.html>. Accessed 28 March 2018.

The Guidelines describe the streetscape in sub-area 1, centered around the Plaza. They mention trees, commercial buildings, and wide sidewalks that foster window-shopping and seating. They also mention street parking, which is characterized as angled.¹⁰ The Guidelines say that,

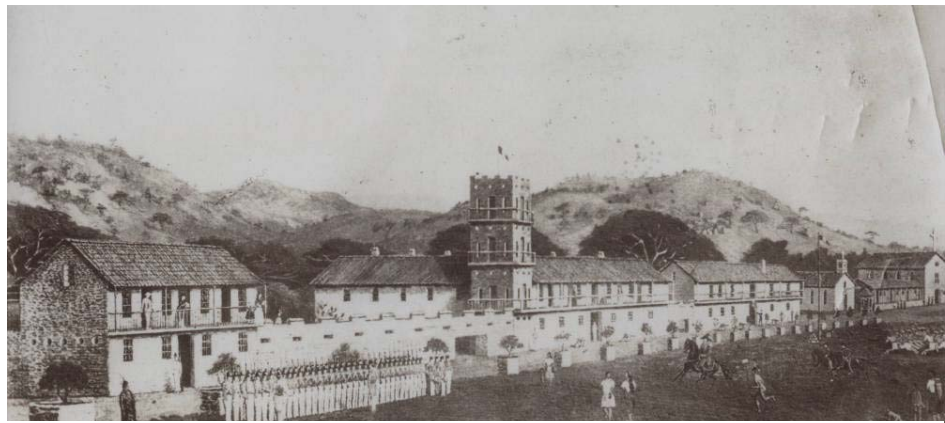
“the streetscape surrounding the Sonoma Plaza should be activated on the sidewalk. This can be achieved through the use of landscaping, lighting, and street-level transparency for commercial and mixed-use buildings. Surface parking lots or parking lots visible from the street, particularly in new developments, should be avoided.”

The Guidelines do not provide specific information about the treatment of streets, crosswalks, or traffic patterns.

Sidewalks, Curbs, Crosswalks, Signs, Traffic Devices: Historical Context

Motor vehicles, asphalt and Portland cement paving, and electricity did not exist when Sonoma was laid out on the pattern dictated by the Laws of the Indies. Though wagons and coaches were in use, most traffic was pedestrian. Streets were open space owned by the government and used by the public, bounded by private property; in urban zones such as Sonoma, they were effectively the area between the fences or the front walls of buildings on two sides and were not subdivided or organized into traffic lanes, sidewalks, parking zones, etc. The citations of the provisions of the Laws of the Indies included in the historical designations of Sonoma Plaza relate to the orientation and layout of the streets, the relationship of buildings to the streets, and the configuration of the town with public open space in the Plaza and civic facilities surrounding it. Long after these features were established, the streets were paved and sidewalks built; power lines and poles were installed—and later removed; traffic lanes, crosswalks, and parking spaces were defined by raised

curbs, curb cuts, and painted markings and signs; and amenities like streetlights, banners, and benches were installed. The later developments did not meaningfully change the urban character created by the layout



Mexican fort and barracks, Sonoma, California, in the 1840s, from Sonoma Heritage Collection -- Sonoma County Library. Note that the street has no curb, sidewalk, traffic lanes, signs, etc.

established under the Laws of the Indies. None of the historical designations of Sonoma Plaza takes note of curb cuts, sidewalk planters, parking configurations, or traffic islands—and it is reasonable to conclude from this consistent omission that these features neither contribute

¹⁰ Page & Turnbull. *Sonoma Historic Preservation Design Guidelines* 3/8/2017. Page 54.

meaningfully to the ability of Sonoma Plaza to convey its historical significance, nor detract importantly from it.

Summary: Significance of Sidewalks, Curbs, Paving, Intersections

From the references cited above, the following conclusions can be made about the historical significance of the intersections around the Plaza, including the one at West Napa Street and First Street West:

- The intersections are located in a National Historic Landmark and National Register District, and are part of the setting of buildings listed in the Valley of the Moon survey.
- As set forth in detail in the 1992 National Register nomination, the street grid is an important character-defining feature of the Sonoma Plaza District, which is significant for its association with urban planning in Colonial Spain.
- The open space (including the streets and the Plaza), which forms the setting of the historically significant buildings, has the “bucolic” feeling of a small town.
- The sidewalks allow people to linger and look at the district, as well as to walk directly from one place to another.
- The specific traits of the sidewalks, curbs, streets, paving, signage, and traffic controls are not important to the historical development or integrity of the district.

Evaluation of Proposed Changes

The mitigation measure would construct bulbouts on all four corners of the intersection of West Napa Street and First Street West. On the west side of the intersection, there would be a narrow median consisting of a raised curb in First Street West on each side of the crosswalk. The mitigation measure would not change the number of lanes, the parking, or the traffic pattern in the two streets. It would result in more sidewalk area and less roadway area at the intersection, and would change the shape of the curb line at the four corners. It would also adjust the location of the crosswalks. It would not alter the Plaza or the street grid. The bulbouts would not have planting, street furniture, or other features, and construction would not require the removal of such features. The tree located within the alignment of West Napa Street east of the subject intersection would not be affected.

A National Park Service publication that interprets the Secretary of the Interior’s Standards for the Treatment of Historic Properties, the Guidelines for the Treatment of Cultural Landscapes, recommends in its “Circulation” tab, “Designing and installing compatible new circulation features when required by the new use to assure the preservation of historic character of the landscape. For example, controlling and limiting new curb cuts, driveways, and intersections along a historic road.” It lists as “not recommended...Placing a new feature where it may cause damage, or is incompatible with the historic circulation. For example, adding new driveways, intersections, and ‘neck outs’ along a historic road.”¹¹ Conversely, the same publication’s “Special Considerations” tab discusses accessibility considerations and recommends

¹¹ <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/circulation.htm>. Accessed 28 March 2018.

“...incorporating wider sidewalks only at intersections where ramps are being installed, leaving the main runs of historic sidewalks in place.”¹²

The National Park Service’s Guidelines for Rehabilitating Buildings also contain recommendations for “Setting (District/Neighborhood)” which address site issues. These guidelines recommend “Identifying, retaining, and preserving building and landscape features that are important in defining the overall historic character of the setting. Such features can include circulation systems, such as roads and streets; furnishing and fixtures, such as light posts or benches; vegetation, gardens and yards; adjacent open space, such as fields, parks, commons or woodlands; and important views or visual relationships.” It recommends “reserving the relationship between a town common or urban plaza and the adjacent houses, municipal buildings, roads, and landscape and streetscape features” and lists as “not recommended...Altering the relationship between the buildings and landscape features in the setting by widening existing streets, changing landscape materials, or locating new streets or parking areas where they may negatively impact the historic character of the setting.” The Guidelines allow for changes driven by security, recommending “Installing protective fencing, bollards, and stanchions in the setting, when necessary for security, that are as unobtrusive as possible.”¹³

Another National Park Service publication, *Preservation Brief 32; Making Historic Properties Accessible* (1993)¹⁴ recommends three initial steps in planning accessibility improvements:

1. Review the significance of the property and identify character-defining features
2. Assess accessibility
3. Evaluate accessibility options within a preservation context.

Brief 32 says that “Solutions should provide the greatest amount of accessibility without threatening or destroying those materials and features that make a property significant.” It continues that “Accessibility modifications should be in scale with the historic property, visually compatible, and, wherever possible reversible.” It adds that the new features should be differentiated from the historic design so they do not appear original, and that “Modifications...to pathways should not alter significant landscape features.”

In short, the National Park Service recommends avoiding major changes to important landscape features in a historic district. This requires determining which landscape features are important to the Sonoma Plaza District, and whether the bulbout would be a major change to them. The street grid and its relationship to the Plaza, which are described and explicitly cited in the 1992 National Register nomination and can be reasonably inferred in most of the other documents’ references to the urban development pattern, are important character-defining features of the Sonoma Plaza District. West Napa Street and First Street West are among the most important parts of the grid and Plaza, so they, too, are clearly important character-defining features. The sidewalks, curbs, paving, roadway, traffic pattern, parking, and markings/signage are certainly not as old as the grid and the Plaza, and each of these features individually plays a tiny role at best in shaping the District. These elements are not character-defining features of the District. Enlarging the sidewalks at the intersection and changing the shape of the curb line would

¹² <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/special.htm>. Accessed 28 March 2018.

¹³ <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf> Accessed 28 March 2018.

¹⁴ <https://www.nps.gov/tps/how-to-preserve/briefs/32-accessibility.htm>

change the geometry and width of the roadway and sidewalk; create a choke point for vehicular movement; and connect the two sides of the street more closely for pedestrians—but these changes would not meaningfully change the spatial character of the street (which is defined by the building wall and the edge of the Plaza) and would have no effect at all on the grid. They would fall below the level of importance set forth in the Guidelines for Rehabilitating Buildings as cited above, and they are not among the “significant landscape features” referenced in the excerpt from Preservation Brief 32 in the previous paragraph. The bulbout on the four corners of the intersection would not alter a character-defining feature of the Plaza (or District) and would not affect the historic framework of the District attributable to the Laws of the Indies. It would be readily reversible in the future.

Because the Guidelines for Cultural Landscapes say new “neck outs” are *not* recommended on historic roads, the mitigation measure may not conform to the Secretary’s Standards—even though the other citations listed above from the National Park Service Guidelines would suggest that the bulbouts are permissible. From practice in other cities, it appears that bulbouts have sometimes been deemed compatible with historic settings, while other references appear to argue against them. The following paragraphs include examples found in a cursory online search:

Winchester, VA

The City’s “Historic Preservation & Urban Design” planning chapter specifically recommends “Reduction of street widths and turning radii at intersections”¹⁵ through “bump outs” and cites Cameron Street, where bulbouts are visible in satellite photos of the historic district. The 2017 Guidelines for the historic district encourage “some type of distinctive crosswalks at key intersections”—but do not mention bulbouts.¹⁶

Preservation Office Guide to Historic Roads

The Preservation Office Guide to Historic Roads (which is intended for use by State Historic Preservation Officers, but does not claim to have been approved or adopted by them) makes the case that roads are historic resources in danger of alteration and demolition and that “The design, materials and construction technology of roads is as important to a site’s history as the buildings, structures and landscape.”¹⁷ The document includes a section on traffic-calming measures—which it generally praises for effectiveness in Europe, but discourages for application in the United States. It argues that historic roads are intrinsically traffic-calming, and warns that “Any construction associated with traffic calming may be subject to Section 106 or 4(f), and may impact National Register listing or determination of eligibility.” It does not endorse the use of any of the traffic-calming measures it discusses, which include chicanes (basically, a series of mid-block bulbouts which alternate from one side of the street to another to turn the vehicular lane into a sharp slalom that forces drivers to slow down).¹⁸

New Jersey Toolkit

¹⁵ Winchester, VA Comprehensive Plan – 2011, page 6

¹⁶ Winchester Historic District Design Guidelines, Chapter 7: Streetscape. Page 4: Pedestrian Walks and Curbs.

¹⁷ Paul Daniel Marriott. *The Preservation office Guide to Historic Roads: Clarifying Preservation Goals for State Historic Preservation Offices, Establishing Preservation Expectations for State Transportation Departments*. Washington, DC. 2010. Page 6.

¹⁸ Ibid. Pages 61-62.

The *Toolkit for Historic Roadways* issued by the New Jersey Department of Transportation “was developed to show that the concerns of transportation engineers and historic preservationists are not mutually exclusive” and offers design concepts which “must be carefully selected with the goal of evoking the Period of Significance of the historic resources, as well as being compatible with the historic surroundings.”¹⁹ It states that bulbouts may be appropriate in historic districts and provides photos of them in three districts in New Jersey.²⁰

Route 50 in Virginia

A coalition formed in 1995 in Virginia advocated for traffic-calming improvements to 20 miles of the existing State Route 50, which passes through three historic villages, instead of building a four-lane freeway bypassing them. The plan included bulbouts at intersections within a historic district in Middleburg, VA.²¹

Conformance to the Secretary’s Standards

Based on the references cited above, it appears the proposed bulbouts would not alter character-defining features of the Plaza or the District. The bulbouts would not be out of scale to other features such as the sidewalks, traffic islands, signage, parking and travel lane markings, and street amenities found on the streets that form the four sides of the Plaza. However, because the Guidelines for Cultural Landscapes specifically list “neck outs” as “not recommended,” for the purposes of CEQA evaluation, it cannot be stated with confidence that the proposed bulbouts would conform to the Secretary’s Standards.

Evaluation of Impact

CEQA Guidelines Section 15064.5 provides the criteria and methodology for identifying historical resources and weighing the impact a proposed project would have on them. It states that a property listed in the National Register is a historical resource for the purposes of CEQA. Subsection (b) states:

“A project with an effect 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.

- 1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
- 2) The significance of an historical resource is materially impaired when a project:
 - A. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources.”

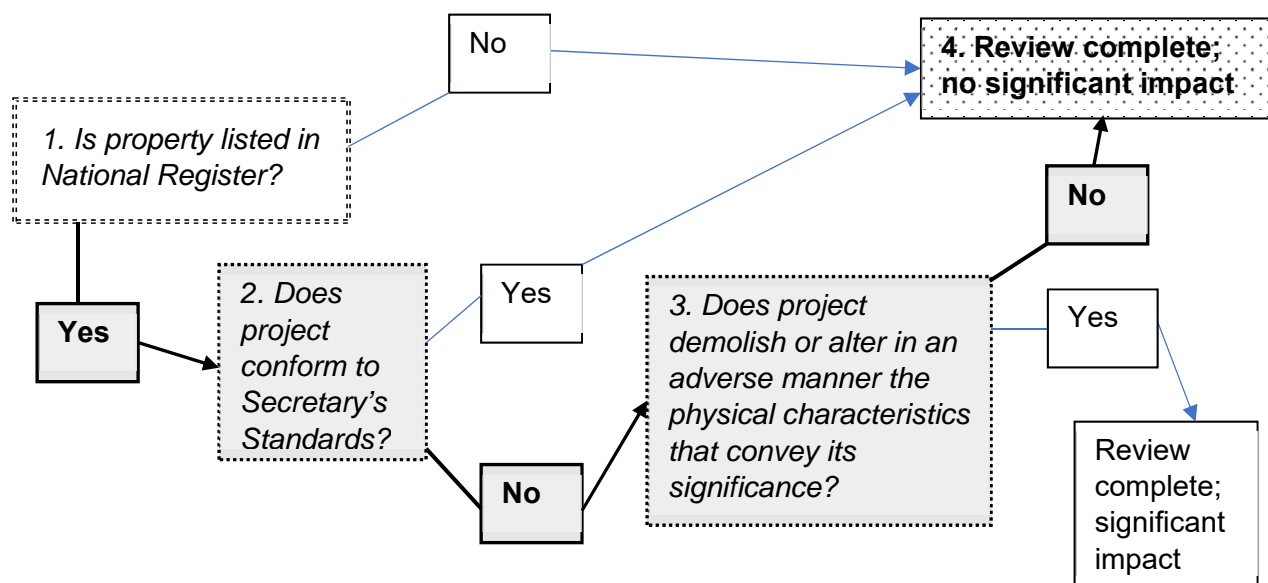
¹⁹ Bureau of Landscape Architecture and Environmental Solutions, Division of Capital Program Support, New Jersey Department of Transportation. *Toolkit for Historic Roadways*. 2011. Page 2.

²⁰ Ibid. Pages 4-5, 7.

²¹ www.route50.org/middleburg.html. Accessed 29 March 2018.

Section 15064.5 goes on to state that if a project conforms to the Secretary of the Interior's Standards for the Treatment of Historic Properties, it is presumed to have a less than significant impact. This "safe harbor" provision is often used in CEQA review because the Secretary's Standards are widely used nationally and applied regularly by local, state, and national reviewers. However, as long as a project would not materially impair the significance of a historical resource, it would not cause a substantial adverse change in its significance and thus would not have a significant effect on the environment—even if it did *not* conform to the Secretary's Standards.

The following flow chart illustrates the procedures for evaluating historical impacts under Section 15064.5. (The wording in the flow chart is tailored from the broader wording in the Guidelines and some of the criteria have been simplified to address only the particulars of the proposed project, but this flow chart represents all the required steps for analysis of impact on historical resources.) The applicable particulars described in this section are in shaded boxes. The process begins in the box at the upper left with a double dashed outline. The evaluation steps are denoted by boxes with a single dashed outline. The conclusion is in the box with dotted fill. The numbered evaluation steps are explained in more detail below the flow chart.



1. *Is the District is listed in the National Register?* **Yes**, as described above.
2. *Does the project conform to the Secretary's Standards?* **No**, because the Guidelines for Cultural Landscapes recommend against constructing "'neck outs' along a historic road." (This is a conservative evaluation under the references cited, appropriate for CEQA.)
3. *Would the project would demolish or alter in an adverse manner the physical characteristics that convey the District's significance (and justify its eligibility to the National Register)?* **No**, as discussed above, the roadways, sidewalks, and curb lines which would be modified to create the bulbouts do not convey the historical significance of the District and are not the features that justify its inclusion in the National Register.
4. **Therefore, the proposed project would have a less than significant impact.**

To summarize, the Plaza District is a historical resource for the purposes of CEQA. It is significant (among other reasons) because it is a rare example of a town laid out under the Laws of the Indies. In evaluating whether a project would have a significant effect on historical resources under CEQA, the most common test is the “safe harbor”—whether the project would conform to the Secretary of the Interior’s Standards. Because the Guidelines for Cultural Landscapes discourage construction of “neck outs” on historic roads, it cannot be assumed in the EIR that the bulbouts would conform to the Standards. However, the fundamental test for impacts under CEQA is whether the project would materially impair the significance of the District by demolishing or altering the physical characteristics that convey its significance and justify its inclusion in the National Register. The National Register nomination form and other designations do not mention the sidewalks, curbs, street paving, or traffic lanes which would be altered to create the bulbouts. The designation documents do list the square grid of streets with the open Plaza at its center as a character-defining feature of the District. Construction of the bulbouts would not alter or detract from the clarity of the street grid. The physical features which would be altered do not convey the significance of the District. This means that there would not be a substantial adverse change in the significance of the District, and therefore the mitigation measure would not have a significant effect on the environment with respect to historical resources.