

Historical Resource Technical Report

Brown Field Municipal Airport
Building 2002
1424 Continental Street
San Diego, CA 92154

FINAL REPORT

Prepared for:

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Executive Summary

IS Architecture was retained as a subconsultant to HELIX Environmental Planning, Inc. (HELIX) to complete a Historical Resource Technical Report (HRTR) for Building 2002 at Brown Field Municipal Airport as in support of the Brown Field Municipal Airport Master Plan update and its Programmatic Environmental Impact Report. Building 2002, the historic control tower/administration building, is a contributing resource to the eligible Auxiliary Naval Air Station Brown Field Historic District (District) and, therefore, is a historical resource under the California Environmental Quality Act (CEQA).

The purpose of this HRTR is to evaluate the impacts of a rehabilitation project of Building 2002 in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties on both Building 2002 as a contributing resource, and on The National Register Eligible Auxiliary Naval Air Station Brown Field Historic District to which it contributes. This report also summarizes the previously established eligibility of Building 2002 for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and the San Diego Register of Historical Resources (SDRHR) where Building 2002 is listed as HRB # 406. The National Register Eligible Auxiliary Naval Air Station Brown Field Historic District includes SDRHR HRB #s 405-409. The eligible Auxiliary Naval Air Station Brown Field Historic District is being evaluated only for the impact of modifications to Building 2002. San Diego Register of Historical Resources HRB #410 and #411 are located within the Larger APE for the Brown Field Municipal Airport Master Plan but are not considered contributing resources to the National Register of Historic Places Eligible District¹. The report also revisits integrity to assure that condition issues and/or alterations have not compromised the contributing resources' integrity since the District's last evaluation in 2010.

This study concludes that the integrity of both the District and of Building 2002 as a contributor to the District are intact, and all resources remain eligible for listing in the NRHP, CRHR, and SDRHR. This study concludes that the rehabilitation project scope of Building 2002, as a resource in its own right and keystone resource of the District as a whole, will have ***less than significant impact with mitigation*** per the CEQA guidelines and the mitigation measures conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

¹ Helix, *Cultural Resources Affected Environment – Working Paper for Brown Field Airport*, 2017. 11

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1 Introduction

The City of San Diego owns and operates the Brown Field Municipal Airport as a General Aviation airport located within the Otay Mesa community north of Otay Mesa Road, east of Heritage Road, south of Pogo Row, and west of La Media Road. Airport planning occurs at the national, state, regional, and local level; and in 2017, the City began developing an Airport Master Plan to determine the extent, type, and schedule of development needed. An Airport Master Plan presents the community and airport's vision for a 20-year strategic development plan based on the forecast of activity. It is used as a decision-making tool and is intended to complement other local and regional plans. The Airport Master Plan consists of a report documenting existing conditions of the airport, a forecast of activity, facility requirements (the airport's needs based on the forecast and compliance with Federal Aviation Administration (FAA) Design Standards for airports), development and evaluation of alternatives to meet those needs, and a funding plan for that development. The Airport Master Plan also includes an Airport Layout Plan (ALP) which graphically depicts all planned development at the airport within the 20-year planning period as determined in the Airport Master Plan. This drawing requires approval by the FAA, which makes the airport eligible to receive federal funding for airport improvements and maintenance under the FAA's Airport Improvement Program.

The Airport Master Plan would involve both landside and airside components. Much of Brown Field has been leased by the City to the proposed developers of the Metropolitan Airpark Project (MAP), a project which was reviewed previously in a separate EIR (SCH No. 2010071054) and is not part of the scope of the Brown Field Municipal Airport Master Plan PEIR or this HRTR.

The primary landside improvement to be covered was a new 14,000 square foot terminal building. The Notice of Preparation (NOP), issued February 7, 2019, identified that the preferred method of accomplishing this was to demolish the existing building but to retain or move the existing historic control tower. However, a demolition of Building 2002 would constitute a Significant and Unavoidable Impact to both Building 2002 as a contributing resource and the District as a whole, which cannot withstand the loss of its keystone resource.

Therefore, the PEIR lists the Terminal project description as:

...the proposed project is to be a rehabilitation of the existing building, as defined by the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties, for use and forecasted demand. All proposed rehabilitation work for the terminal building, will need to comply with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties.

For the purposes of this HRTR, IS Architecture has been tasked with evaluating a general rehabilitation of Building 2002. Because details regarding the scope, design, and construction are not available at the programmatic level, this analysis is made with the general assumption that the rehabilitation project of Building 2002 would address the deficiencies identified in Chapter 3

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Project Description of the PEIR. This report does not evaluate the larger proposed Brown Field Municipal Airport Master Plan and its impact on any historical resources.

1.1 Report Organization

This report is organized according to the guidelines established by the City of San Diego's *Historical Resource Technical Report Guidelines and Requirements*. Information on the project setting and historical context are established in Chapter 2. The project's research and evaluation methodology are outlined in Chapter 3. The previously established eligibility of Building 2002 and of the District, as well as an updated integrity evaluation, are summarized in Chapter 4. Chapter 5 addresses the findings of this study, including a discussion of impacts under CEQA and the recommendation of any mitigation measures. Appendices include 10 maps, preparer's qualifications, and California Department of Parks and Recreation 523 forms (DPRs).

1.2 Project Area

Brown Field Municipal Airport is located 1.5 miles north of the U.S. – Mexico border in the Otay Mesa community of the City of San Diego. The District consists of approximately 2.5 acres located within the southwest quarter of the airport. The western boundary is parallel with the western side of the westernmost nose end hangar (Building 2005). The district encompasses the perimeter of this building and then continues south-easterly along Curran Street for approximately 2,000 feet, encompassing the perimeters of the remaining nose end hangars (Buildings 10, 2004, and 2003) until it reaches the intersection of Curran and Continental Streets. From here it runs in a north-easterly direction along Continental Street to the original control tower building (Building 2002) where the perimeter of that building is encompassed by the district boundary.

The Area of Potential Effects is mapped in Appendix A-2. The proposed work to Building 2002, which is the project evaluated in this report, is limited to the area immediately surrounding the building (mapped in Appendix A-5).

1.3 Personnel

Personnel on this project include Ione R. Stiegler, FAIA, Rebecca McManus, MHP, and Peter Kempson, MAH, MARCH. Ms. Stiegler provided quality control and report review. Ms. McManus was the project manager and primary report author in 2019. Peter Kempson was the Project Manager and primary author of the report in 2024. Full qualifications are included in Appendix C.

2 Project Setting

2.1 Physical Project Setting

Brown Field is located in Otay Mesa, a rural area located in the southeast corner of San Diego County that is adjacent to the Mexican border. Otay Mesa is a unique geographic feature located on a flat mesa between rich biotic zones of riparian valleys, coastal strip, and the mountains of southern San Diego County. The geological area of Otay Mesa is defined by the Linda Vista and Otay formations.

2.2 Project Area and Vicinity

Otay Mesa, located in the southeast corner of San Diego County adjacent to the Mexican border, was first settled by Anglo-Europeans in the late 19th century and became the location of a community of rural farmsteads centered around a one room school house known as Alta School.²

The 2017 Helix Cultural Resources Affected Environment – Working Paper for Brown Field Airport describes the Project area and Vicinity as the following:

Brown Field, originally named East Field in honor of Army Major Whitten J. East, opened in 1918 as an aerial gunnery and aerobatics school for the purposes of congestion relief at North Island during the war efforts of World War I. Alta School was used as an operations base, and the 283rd Aero Squadron set up a base camp of tents in the area surrounding the school (Robbins-Wade and Van Wormer 1999). After the end of war, the training field was turned over to a caretaker and students returned to Alta School.

In the 1920s, the U.S. Navy leased acreage to the west of Alta School and used the field for “touch and go” landing practices (Robbins-Wade and Van Wormer 1999). In 1940, an approximately 320-acre parcel was acquired by the Navy, with an additional 475 acres being acquired two years later in 1942. Landing mats in the shape of wheel spokes, three standard landing runways, barracks, and support facilities were constructed, and in 1943 the field was commissioned as the Naval Auxiliary Air Station (NAAS), Otay Mesa, later changed to NAAS, Brown Field within the same year. Between the years of 1943 and 1946, the Navy and Army used the Air Station for training, with approximately 1,400 personnel stationed at the field in 1944 (Robbins-Wade

² Mary Robbins-Wade and Stephen R. Van Wormer, *Archaeological Study and Historic Building Assessment for the Brown Field Master Plan Update, Otay Mesa, San Diego, California*, Affinis, 1997, p. 6.

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and Van Wormer 1999). By 1945, communication facilities, officer's quarters, a mess hall, dispensary, recreation facilities, and other repair and support facilities had been constructed along with a concrete parking apron, and four concrete runways.

In 1946, Brown Field was decommissioned as a surplus and leased to San Diego County, resulting in portions of the former base being used as a chicken farm, as well as the Chula Vista High School being established within its grounds. However, in 1951 Brown Field was reopened by the Navy during the war efforts of the Korean War, during which time the Navy also acquired 160 acres at the east, which included the site of Alta School, to expand the runway (City of San Diego 2017). In 1954, it was re-commissioned and designated a NAAS. In 1962, ownership was transferred to the City of San Diego under the condition that the airport would remain for the "use and benefit of the public." (City of San Diego 2017). Subsequently, Pacific Southwest Airline (PSA) utilized the airfield for the purposes of training pilots in the mid-to-late 1960s. Brown Field is currently being used as a general aviation airport; since the City's possession of Brown Field, the facility is under the regulatory authority of the Federal Aviation Administration (FAA).³

The City of San Diego officially took possession of Brown Field on September 1, 1962.

Development in the area surrounding the airport has been slow, with aerial photography showing only incremental increases in density through the 1980s. In the mid- to late-1990s, development begins to increase drastically. In the early 2000s, development expanded significantly in the immediate vicinity. As of this report, the area surrounding Brown Field is easily accessible from the west, north, and south by road and is home to commercial, residential, and industrial development.

³ Helix, *Cultural Resources Affected Environment – Working Paper for Brown Field Airport*, 2017.

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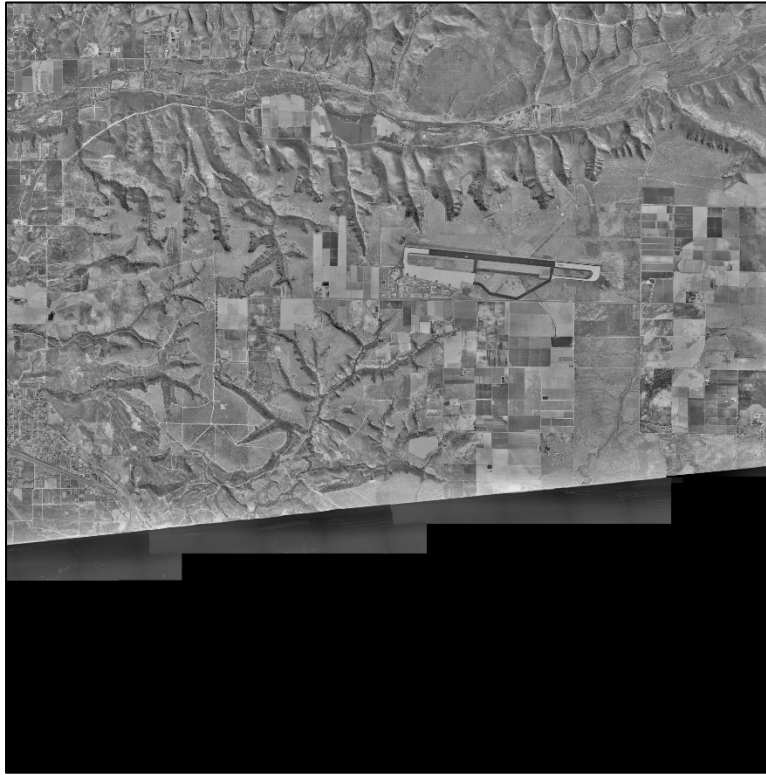


Figure 1: Project vicinity in 1964. USDA.



Figure 2: Project vicinity in 1996. USGS.

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Figure 3: Project vicinity in 2014. Google Earth.

2.3 Historical Overview and Context⁴

Aviation on Otay Mesa began during the First World War when the Army used a training field at Alta School. Increased congestion at Army Signal Corps Air Station Rockwell Field at North Island resulted in four mid-air collisions and scores of accidents in 1917. In order to relieve air traffic the Army established a 640-acre air field on Otay Mesa on April 4, 1918. For the next few weeks a squadron of Curtis JN-4D (Jenny) trainers flew to the mesa for lessons, returning to Rockwell Field in the evening. The field was permanently occupied on April 22 by the 283rd Aero Squadron under the command of Lt. Benjamin Frank. They took over the Alta School grounds as an operations base. Men and machines were sheltered with tents set up adjacent to the school house.

The Army laid out three fields: a junior flying field, a senior flying field, and a deadstick field. In May the advanced flying school relocated from Rockwell Field in Imperial Beach to Otay Mesa and the latter was no longer used for other types of training. In October the facility was designated East Field in honor of Major Whitten J. East. With the War's end the army no longer

⁴ The historical overview and context are excerpted from the report that established the eligibility of the District. Minimal editing was undertaken for legibility and to link excerpted sections; all factual content is original to the Robbins-Wade and Van Wormer study, hereafter referred to as the "1997 Affinis study."

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needed the Otay Mesa base and by April 1919 it was under caretaker status and students soon returned to Alta School.

During the 1920s the U.S. Navy began to use Otay Mesa for aviation training. On December 1, 1928 the Navy leased approximately 320 acres located just to the west of Alta School, consisting of the South Half of Section 28, Township 18 South, Range 1 West (San Bernardino Meridian), as an auxiliary air field to Naval Air Station San Diego on North Island for “touch and go” landing practices. Its elevation at 500 feet above sea level kept the field open when mist and fog made flying at other coastal Navy fields difficult.

In 1931 the Otay Mesa landing field measured 2,500 by 500 feet. It did not have a graded landing strip but consisted simply of an open field with concentrations of ruts worn into the ground from numerous practice landings. It was not to be used by commercial pilots except in emergencies. In 1938 radio-controlled target drone experiments were conducted at Otay Mesa.

With the outbreak of World War II in Europe in 1939, the United States made a concentrated effort to improve its military capabilities. In 1939, Congress began to appropriate millions of dollars for new military facilities, equipment, and personnel.

The war would also have a significant effect on the role of aircraft in the Navy. During WWII, the aircraft carrier assumed equal importance with the battle ship and the air station took its place with the navy yard and training center as an indispensable and major element of Navy logistical support. From 1939 to 1946 naval aircraft ground facilities grew to comprise almost 80 air stations and a host of satellite fields. In 1938, the Navy had only 1,000 planes. The spring of 1940 saw the expansion of the Axis powers in Europe with the invasion of Norway and Denmark and the Low Countries, followed by the fall of France in June. The United States Congress responded immediately with unprecedented National Defense measures, authorizing an 11 percent increase in the Navy on June 14 and immediately thereafter passing a bill that established a “two ocean” Navy that would require a 70 percent enlargement in the forces afloat and expansion of the aircraft program to 15,000 planes. In 1942 the authorized number of naval aircraft and active participation of the United States in the War after December 1941, naval operations needed planes and pilots as fast as the former could be built and the latter trained. This led directly to establishment of Auxiliary Naval Air Station Brown Field.

The Eleventh Naval District found itself overwhelmed under the original 10,000 and 15,000 plane programs of 1940 and quickly began to take action to accommodate the unparalleled requirements. By the end of the war, aircraft facilities in the district would expand to include over 15 installations ranging from practice landing fields to fully manned training bases. As one of only four carrier pilot training facilities, Naval Auxiliary Air Station Brown Field was an important component of this force.

The Otay Mesa airfield consisted of a parcel of 318.99 acres that had been acquired under condemnation proceedings in December 1940 at a cost of 10,400 dollars. The field was built by

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the construction firm of M.H. Golden and Walter Trepte of San Diego. Naval Auxiliary Air Station, Otay Mesa, later to become Brown Field, was commissioned on March 17, 1943 as an auxiliary air field to Naval Air Station San Diego. In August 1943 Chief of Naval Operations designated the station Brown Field in memory of Commander Melville Stuart Brown, USN, who had been killed in a plane crash in November 1936 near Descanso, California. Formal dedication ceremonies at the base occurred on August 11.

By 1945, Brown Field's facilities included barracks, bachelor officer's quarters, mess hall, dispensary, assembly and repair shops, nose end hangars, storehouses, magazine area, athletic pavilion and facilities, recreation and ship's services, transmitter building, outdoor skeet range, and aircraft parking areas. These could accommodate 1484 enlisted men and 156 officers. There were four concrete runways and a 30,000 square yard concrete parking apron south of the runways.

The Navy decommissioned Brown Field as surplus in October 1946 and leased the facility to San Diego County for possible development as a municipal airport. The county leased portions of the former base for agricultural purposes. In June 1947, some buildings were leased to Sweetwater Union High School District and occupied as a senior high school.

3 Methods and Results

3.1 Archival Research

Several cultural resource reports and research efforts that have been previously conducted for the airport property are on file with the City and were provided to HELIX for the purposes of the Master Plan Update. These were reviewed and used for this report, as applicable. The only new archival research conducted as part of this study was the acquisition of historic aerial photography to place the surrounding area's development in visual context. These aerials were acquired from www.historicaerials.com.

3.2 Field Survey

A reconnaissance level, pedestrian survey was completed on February 27, 2019. Building 2002 was thoroughly examined and photographed. The nose end hangars, which constitute the rest of the historic district, were informally surveyed to evaluate whether or not their historic integrity remains since the date of last evaluation. The remainder of the Master Plan APE was informally surveyed for context and to locate the proposed work in relation to the historical resources on site (APE map in Appendix A-1).

DATE	SURVEY TYPE	SURVEY PURPOSE	SURVEYOR(S)
02/27/2019	Photographic, Pedestrian	Initial site visit and photographic documentation	Rebecca McManus, MHP Christopher Usler, MSc

3.3 Description of Surveyed Resources⁵

The District is a National Register eligible historic district found to be significant at the national level and is also comprised of multiple City of San Diego Historic Landmarks (SDRHR HRB No. 405-409). Building 2002 is listed as HRB # 406. San Diego Register of Historical Resources HRB #410 and #411 are located within the Larger APE for the Brown Field Municipal Airport Master Plan but are not contributing resources to the National Register of Historic Places Eligible District.⁶ It is therefore a historical resource under CEQA. As a contributor to that district, Building 2002 is also a historical resource under CEQA. Since a contributing resource within a district cannot be separated from the district as a whole, both Building 2002 and the nose end hangars that constitute the remainder of the historic district are described below.

3.3.1 Building 2002 – Control Tower/Administration Building

⁵ The descriptions in this section are lightly adapted from the 1997 Affinis study.

⁶ Helix, *Cultural Resources Affected Environment – Working Paper for Brown Field Airport*, 2017. 11

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Constructed as a part of the original 1943 Naval Air Station construction, Building 2002, the control tower/administration building, is located to the north and east of the main complex of buildings. The facility has always been highly visible and strongly associated with Brown Field. It is a single-story, roughly rectangular, wood-framed building with a concrete slab foundation. The four-story control tower is located centrally in the building. The building features a flat roof with rolled asphalt roofing on both the lower building and the control tower. The building and tower are sided with vertically-oriented plywood panels scored into the approximation of vertical wood boards.

The building has a variety of window types that include: vertical one-over-one lite sliding aluminum frame windows, fixed aluminum framed windows, and horizontal sliding aluminum framed windows. They are placed in various combinations along all four elevations. Later additions on the east and west ends of the building project beyond the original façades on the north and south sides. They exhibit large, fixed-pane, picture windows on the north side. Additional doors and windows are similar to those present in the remainder of the building.

A four-story control tower rises from the center of the roof. The top-story control room flares slightly outward from the lower sections on all sides. It has a flat roof and a narrow exterior catwalk. Long knee braces support the catwalk on the south side of the tower. A series of five fixed, picture windows on the north, east, and west sides provide viewing areas for the control room. Two of these windows on the east side are covered with plywood. A number of different types of communication antenna are located on the roof and sides of the tower.

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Figure 4: Building 2002 Photo Survey Key Plan. Google Maps, 2019

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Figure 5: Western portion of the south elevation of Building 2002. IS Architecture, 2019.



Figure 6: Main entrance at roughly the center of the southern elevation. IS Architecture, 2019.

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Figure 7: Eastern portion of the south elevation of Building 2002. IS Architecture, 2019.



Figure 8: Eastern end of Building 2002, looking northwest. IS Architecture, 2019.

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Figure 9: Eastern end of the north elevation, looking southeast. IS Architecture, 2019.



Figure 10: Continuing along the north elevation, west of Fig. 9. Northern entrance (through double doors) of the building. IS Architecture, 2019.

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Figure 11: Central portion of the north elevation. IS Architecture, 2019.



Figure 12: North and west sides of the control tower. IS Architecture, 2019.

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Figure 13: Continuing along the north elevation, west of Fig. 11. IS Architecture, 2019.

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Figure 14: Continuing along the north elevation, west of Fig. 13. IS Architecture, 2019.



Figure 15: Continuing along the north elevation, west of Fig. 14. IS Architecture, 2019.

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Figure 16: Western end of Building 2002, looking southeast. IS Architecture, 2019.



Figure 17: Eastern end of Building 2002, looking southeast. IS Architecture, 2019.

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3.3.2 Buildings 2003, 2004, 10, and 2005 – Nose End Hangars

The four nose end hangars are located along the southern edge of the concrete flight deck tie down area. These three-story, rectangular, wood framed hangars measure approximately 81 by 72 feet and are T-shaped in cross-section. The central portion of the buildings contain offices and mechanic's shops while the cross of the "T" consists of a moderately-pitched, asphalt shingle clad, gabled roof that shelters the open-air work areas. The building is supported by two parallel rows of wooden piers placed approximately twenty feet apart. Wooden cross braces tie the rows of piers together. Triangular, wood roof trusses extend approximately forty feet to the east and west of each pier row.



Figure 18: Buildings 2003, 2004, 10, and 2005 Photo Survey Key Plan. Google Earth, 2024.

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Figure 19: Building 2003, looking north. IS Architecture, 2019.



Figure 20: Building 2004, looking north. IS Architecture, 2019.

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Figure 21: Building 10, looking east. IS Architecture, 2019.



Figure 22: Building 2005, looking south. IS Architecture, 2019.

4 Eligibility Evaluations

Historical resources under CEQA are defined as resources listed in or determined to be eligible for listing in the NRHP, CRHR, or in a local register, such as the SDRHR (§15064.5). Accordingly, the District is evaluated below for eligibility for all three historic resource registers.

4.1 Significance

In order to be eligible for designation, a resource must both have significance under one or more Significance Criteria *and* retain sufficient integrity to convey that significance in its current state. What follows is an evaluation of significance only; see the Section 4.2 for an evaluation of integrity and Section 4.3 for a final eligibility conclusion.

4.1.1 National Register of Historic Places

To be eligible for listing in the NRHP, a property must be at least 50 years of age and possess significance in American history and culture, architecture, or archaeology. Younger properties can be eligible for listing if they achieve exceptional significance.⁷

A property of potential significance must meet one or more of four established criteria:⁸

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

The National Register historical significance was established in the 1997 Affinis study by Mary Robbins-Wade and Stephen R. Van Wormer. The below summarizes the results of that district evaluation.

The Auxiliary Naval Air Station Brown Field Historic District was determined to be significant under the four significance as follows:

Criterion A: Associated with events that have made a significant contribution to the broad patterns of our history.

⁷ *National Register Bulletin #15*, p. 2.

⁸ Title 36 Code of Federal Regulations Part 60.4.

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The District **is** significant at the national level under Criterion A for its important role as a repair and training facility in support of Naval preparedness and mobilization while conducting the war in the Pacific during World War II.⁹ The period of significance for Criterion A is 1940-1945.

Criterion B: Associated with the lives of persons significant in our past.

The District **is not** significant under Criterion B, as no persons associated with the district or individual contributors to the district rise to a sufficient level of significance.

Criterion C: Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

The District **is** significant under Criterion C in that many of its buildings embody distinctive architectural designs and methods of construction unique to naval air stations during the Second World War.¹⁰ The period of significance for Criterion C is 1940-1945.

Criterion D: Yield, or may be likely to yield, information important in prehistory or history.

The District **is not** significant under Criterion D. It has not yielded and is not likely to yield information important in prehistory or history.¹¹

4.1.2 California Register of Historical Resources

The criteria for eligibility of listing the CRHR are based upon NRHP criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the CRHR, a property must be at least 50 years of age and possess significance at the local, state, or national level. Younger properties can be eligible for listing, however, if they achieve exceptional significance.

A property of potential significance must meet one or more of four established criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United State; and/or

⁹ The 1997 Affinis study did not explicitly address the level of significance (local, state, or national) of the District. However, it can be inferred from the statements in the report that the District is significant in the Pacific Theater of the war and therefore at the national level.

¹⁰ See note 10.

¹¹ The 1997 Affinis study did not explicitly address Criterion D or archaeological potential. While there are archaeological resources on the larger Brown Field property, the district is located in a developed area identified as a Low level of probability on the Cultural Constraints map prepared for the Airport Master Plan (reference Appendix A-3).

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2. It is associated with the lives of persons important to local, California, or national history; and/or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; and/or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Resources found to be significant under NRHP Significance Criteria can generally be found to be significant under the equivalent CRHR Significance Criteria. Accordingly, the District is significant under the CRHR Significance Criteria 1 and 3, at the state level (see Section 4.1.1, above).

4.1.3 San Diego Register of Historical Resources

The Historical Resources Guidelines of the City's Land Development Manual identifies the criteria under which a resource may be historically designated. It states that any improvement, building, structure, sign, interior element and fixture, site, place, district, area, or object may be designated a historic resource on the San Diego Register of Historical Resources (San Diego Register) by the City's Historical Resources Board (HRB) if it meets one or more of the following HRB designation criteria:

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

The buildings that comprise the National Register of Historic Places Eligible District were individually listed in the SDRHR on February 2000. Building 2002 was listed as HRB #406 and designated along with HRB #406, 407, & 408 under Criterion E each, as a resource previously

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determined eligible for listing in the NRHP and/or CRHR. Building 2004 was designated under Criteria B and C as SDRHR HRB # 409.

4.2 Integrity

Integrity is the ability of a property to convey its significance. To be eligible for listing, a property must not only be shown to be significant under the criteria, but it also must have integrity. The evaluation of integrity is grounded in an understanding of a property's physical features and how they relate to its significance.

Historic properties either retain integrity (that is, are able to convey their significance) or they do not. Within the concept of integrity, the NRHP criteria recognize seven aspects of integrity. These seven aspects include location, setting, design, materials, workmanship, feeling and association. To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant. The seven aspects of integrity are defined as follows:

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

The 1997 Affinis study evaluated the integrity of the District and its contributors. In February 2019, IS Architecture conducted an updated integrity evaluation that confirmed no significant alterations or serious condition issues had compromised the integrity of the district or its contributors. The below 1997 integrity evaluation remains valid.

Location: The place where the historic property was constructed or the place where the historic event occurred.

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The District retains a high degree of integrity of location. The buildings occupy the exact locations they did during the period of significance.

Setting: The physical environment of a historic property.

The District's setting was highly modified by its development during World War II, so that by 1945 very little unaltered natural topography remained south of the air strip. The base was surrounded by open agricultural fields during the war years much as it is today. In spite of recent development on Otay Mesa, open fields still remain to the north, south and east of the airport. Areas to the west and northwest of the facility have been occupied by auto storage lots and wrecking yards.¹² The District retains a good degree of integrity of setting.

Design: The combination of elements that create form, plan, space, structure, and style of a property.

The placement of the repair docks along the southern edge of the concrete aircraft warm up and parking aprons with the tower at the east end of the complex of buildings reflects the original layout of this portion of the station as designed by the Naval Public Works Office. The District, therefore, retains its key design elements, giving it a high degree of design integrity.

Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

Most of the contributing buildings and structures within the District retain original materials which include asphalt shingle and composition asphalt roofing material covered roofs, stucco and wood siding coverings, and concrete foundations. The major alteration that most of the structures have undergone has been replacement of original doors and windows by installing modern fixtures in the original openings. For all five buildings, the original materials are largely intact.

Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

The District retains integrity of workmanship through the existence of original materials as discussed above.

Feeling and Association: Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. Association is the direct link between an important historic event or person and a historic property.

¹² Development has continued around the airport, but this evaluation remains generally correct.

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The District’s integrity of location, setting, design, and materials as discussed above combine to give a strong sense of feeling and association. The District and contributing elements within it exist on original locations in a generally unaltered setting. Within this context the original repair docks and control tower combine to convey the historic character of the base’s development, construction, and contribution to winning the war in the Pacific during the Second World War.

4.3 Eligibility Conclusions

The District is significant at the national level under NRHP Criteria A and C with a period of significance of 1940-1945. The District is significant under CRHR Criteria 1 and 3 with a period of significance of 1940-1945. The District is significant under SDRHR Criterion E with a period of significance of 1940-1945. The District retains all seven aspects of integrity. The combination of significance and intact integrity means that the District is eligible for listing the NRHP and CRHR. The district has previously been listed in the SDRHR (No. 405-411).

Eligibility Summary				
Register	Significance Level	Significance Criteria	Aspects of Integrity	Period of Significance
National Register of Historic Places	National	A, C	7 out of 7	1940-1945
California Register of Historical Resources	National	1,3	7 out of 7	1940-1945
San Diego Register of Historical Resources	--	E	7 out of 7	1940-1945

5 Findings and Conclusions

5.1 Impact Findings

Under CEQA, a significant effect to a historical resource is one that “may cause a substantial adverse change in the significance of an historical resource” (§15064.5[b]). A substantial adverse change may include “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” (§15064.5[b][1]). Any change that alters a historical resource’s eligibility for listing in an historical register must be classified as an impact.

The following classifications can be used to characterize impacts under CEQA:

- A **beneficial impact** would result when the proposed project would have a positive effect on the natural or human environment. No mitigation is required for beneficial impacts.
- **No impact** would result when no adverse change in the environment is expected. No mitigation is required for a finding of no impact.
- A **less than significant impact** would not cause a substantial change in the environment, although an adverse change in the environment may occur that does not rise to a level of significance. In the case of a less than significant impact, only compliance with standard regulatory conditions would be required.
- A **less than significant impact with mitigation** would cause a substantial adverse effect on the environment but would be reduced to a less-than-significant level through successful implementation of identified mitigation measures. Mitigation measures are required for a less than significant impact with mitigation.
- A **significant and unavoidable impact** would cause a substantial adverse effect on the environment, and no feasible mitigation measures would be available to reduce the impact to a less-than-significant level, even after all feasible mitigation measures have been implemented to reduce the impact to the extent possible. Mitigation measures are permitted for a significant and unavoidable impact, even though the mitigation will not reduce the impact below the level of significance.¹³

CEQA requires the evaluation of both direct and indirect impacts to resources within the project area. Direct impacts include design changes and the processes of development themselves, including but not limited to grading, demolition, alteration, new construction, and staging activities. Indirect impacts are those that alter the non-physical character of the historic resource or alter its significant setting. Indirect impacts can include but are not limited to the alteration or interruption of viewsheds, the addition of significant noise or vibration, or the substantial alteration of air quality. CEQA also recognizes the cumulative impact of changes on a resource,

¹³ *Sierra Club v. County of Fresno*, 2018. Accessible at: <https://cases.justia.com/california/supreme-court/2018-s219783a.pdf?ts=1545687370>, p. 30.

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meaning that the accumulation of small-scale, individually insignificant changes may also constitute a significant impact.

5.1.1 Direct Impacts

The rehabilitation of Building 2002 has been identified as taking place in Phase II Mid-Term (6-10 years) of the 20-year Master Plan. Details regarding the rehabilitation scope, design, and construction are not available at the programmatic level, but for the purposes of this analysis, it is assumed that the rehabilitation project of Building 2002 would address the deficiencies identified in Section 3, Facility Requirements, of the Airport Master Plan as part of the scope to rehabilitate the existing building for use and forecasted demand.

This rehabilitation scope will consist of mitigation measures of environmental concerns such as lead paint, hazardous materials in the ceiling and floors, pest infestations, and repairs of damage to the structure such as cracks in the foundation. While Building 2002 has been identified as being outdated with administrative offices and conference rooms of inadequate size to handle the day-to-day operations of SDM personnel, the Facility Demand Forecast of the terminal space analysis found the “existing size of the facility is adequate over the 20-year planning period.” Therefore, the rehabilitation project is assumed to include interior rehabilitation but not any alteration of the building’s footprint. Finally, it is assumed that all rehabilitation work will comply with the U.S. Secretary of the Interior’s Standards for the Treatment of Historic Properties.

Section §15064.5[b][3] of CEQA states that:

Generally, a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.¹⁴

Therefore, the rehabilitation project of Building 2002 in compliance with the Secretary of the Interiors Standards for the Treatment of Historic Place would have at the most, a **less than significant impact with mitigation**.

5.1.2 Indirect Impacts

¹⁴ 2024 CEQA: California Environmental Quality Act Statute and Guidelines, 2024. Association of Environmental Professionals. Accessible at: https://www.califaep.org/docs/2024_CEQA_Statute_and_Guidelines_Handbook.pdf, p. 195.

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There are ***no anticipated indirect impacts*** that would result from the rehabilitation of Building 2002. The effect of the rehabilitation of Building 2002 on the District is discussed in Section 5.1.3, Cumulative Impacts.

5.1.3 Cumulative Impacts

Because the Facility Demand Forecast of the terminal space found the “existing size of the facility is adequate over the 20-year planning period,” the project is assumed to not include any alteration of the building’s footprint. The rehabilitation of Building 2002 neither impacts its eligibility as a contributor to the District, nor removes the eligibility of the District as a whole. Building 2002 represents 20% of the District’s contributing resources and is the District’s keystone feature, which supports and represents the District’s significance. Therefore, there is also ***no anticipated cumulative impact*** to the District under CEQA.

5.2 Mitigation Measures

This report provides mitigation measures to be included in the project to avoid unanticipated potentially significant effects of the proposed project. Because details regarding the scope, design, and construction are not available at the programmatic level, it is not possible to conclude that the plans for the rehabilitation of Building 2002 comply with the Secretary of the Interior’s Standards. Therefore, implementation of the following measure would ensure that there would be no adverse impact to the historic resource. This report also does not include avoidance-type mitigation measures. The CEQA guidelines allow mitigation to include “avoiding the impact altogether by not taking a certain action or parts of an action” (§15370[a]). However, when the entire project is a single action, avoidance is not feasible and constitutes instead a No Project alternative. In this case, there is no way to separate the programmatic rehabilitation of a building into “parts of an action” without further project detail and development and the rehabilitation should be considered to be a single action. Project alterations that would demolish any part of the building are significantly different in character from the assumed project and should be evaluated as Project Alternatives, not mitigation measures.¹⁵

MM-1: Secretary of the Interior’s Standards for the Treatment of Historic Properties

Since the project description for the Building 2002 rehabilitation includes the project be done in compliance with the U.S. Secretary of the Interior’s Standards for the Treatment of Historic Properties, the project definitionally “shall generally be considered as mitigated to a level of less than a significant impact” under the CEQA Guideline §15064.5[b][1], which states:

Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior’s

¹⁵ Assessing project alternatives is beyond the scope of this report.

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Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer, the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant.¹⁶

Further development of the Building 2002 rehabilitation project for use and forecasted demand shall be done in compliance with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties. These are:

Standards for Rehabilitation

- 1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*
- 2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.*
- 3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*
- 4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.*
- 5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.*
- 6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*
- 7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*
- 8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*
- 9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.*

¹⁶ 2024 CEQA: California Environmental Quality Act Statute and Guidelines, p. 231

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10. *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*¹⁷

The City shall engage a qualified historic architect and/or architectural historian (pursuant to the Secretary of the Interior’s Professional Qualifications in 36 CFR Part 61) to consult on the project’s development and analyze the final project scope for Compliance with Secretary of the Interior’s Standards for the Treatment of Historic Properties.

5.3 Conclusions

The District is significant at the national level under NRHP Criteria A and C with a period of significance of 1940-1945. The District is significant under CRHR Criteria 1 and 3 with a period of significance of 1940-1945. The District is significant under SDRHR Criterion E with a period of significance of 1940-1945. The District retains all seven aspects of integrity. The combination of significance and integrity means that the District is eligible for listing the NRHP and CRHR. The district has previously been listed in the SDRHR (No. 405-411).

A project done in compliance with the U.S. Secretary of the Interior’s Standards for the Treatment of Historic Properties, is generally “considered as mitigated to a level of less than a significant impact” under the CEQA Guidelines and therefore, the rehabilitation project of Building 2002 would have at the most, a ***less than significant impact with mitigation***, under its rehabilitation project description to be done in compliance with the Secretary of the Interiors Standards for the Treatment of Historic Places. Since specific details regarding the rehabilitation project’s scope, design, and construction are not available at the programmatic level, this report stipulates **MM-1: Secretary of the Interior’s Standards for the Treatment of Historic Properties** so that all feasible mitigation will be carried out following the assumptions of this rehabilitation project’s analysis.

¹⁷ Code of Federal Regulations. §36 CFR 68.3(b), Available at [https://www.ecfr.gov/current/title-36/part-68/section-68.3#p-68.3\(b\)](https://www.ecfr.gov/current/title-36/part-68/section-68.3#p-68.3(b))

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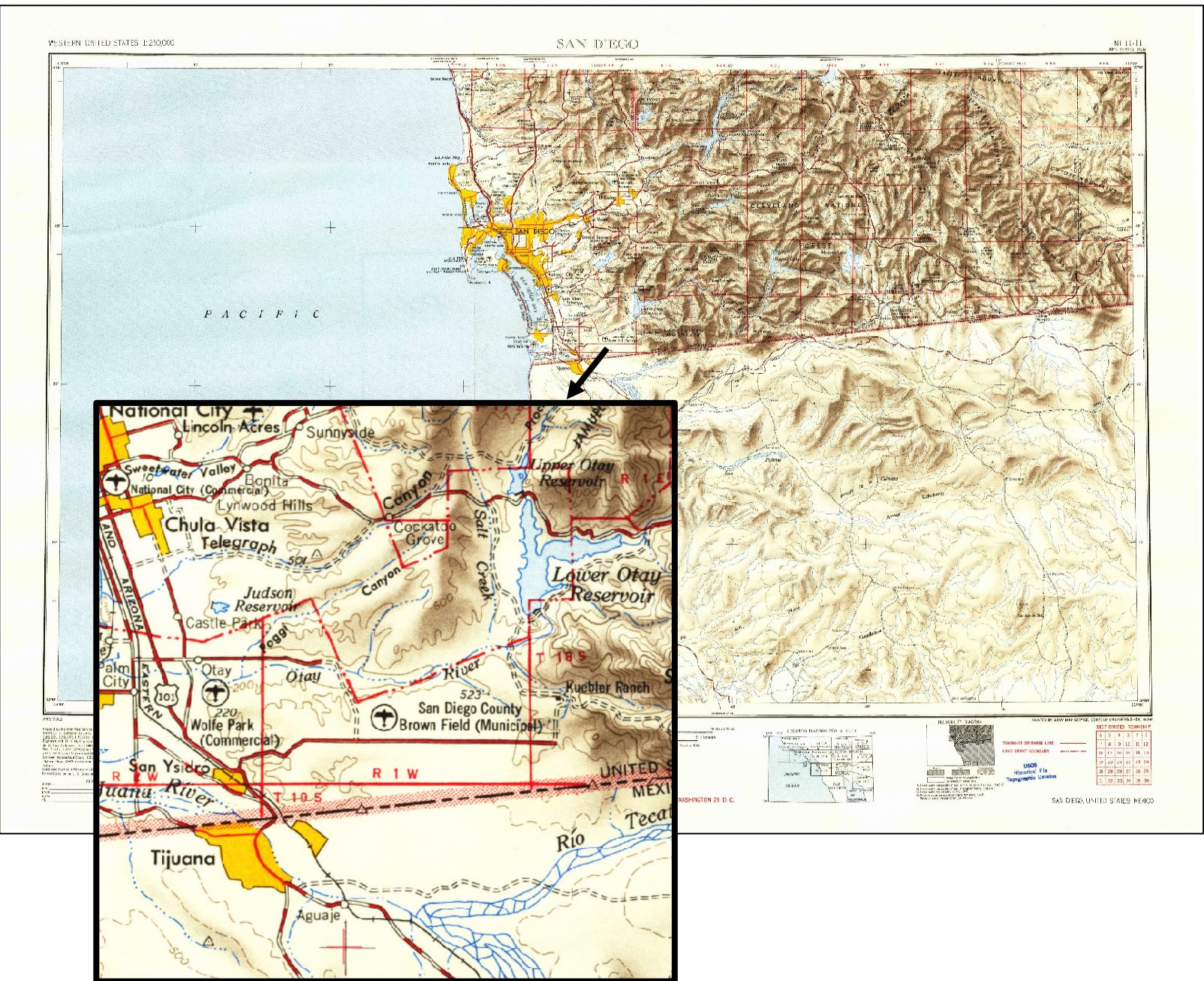
United States, et al. *The Secretary of the Interior's Standards for the Treatment of Historic Properties: With Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*. Revised by Anne E. Grimmer, U.S. Department of Interior, National Park Service, Technical Preservation Services 2017, <https://purl.fdlp.gov/GPO/gpo83651>

Appendix A: Maps

- A-1 USGS Maps
- A-2 Program EIR APE Map
- A-3 Cultural Constraints Map
- A-4 Auxiliary Naval Air Base Brown Field Historic District Map
- A-5 Building 2002 Site Vicinity Map
- A-6 5-30-2024 Preferred Alternate Master Plan

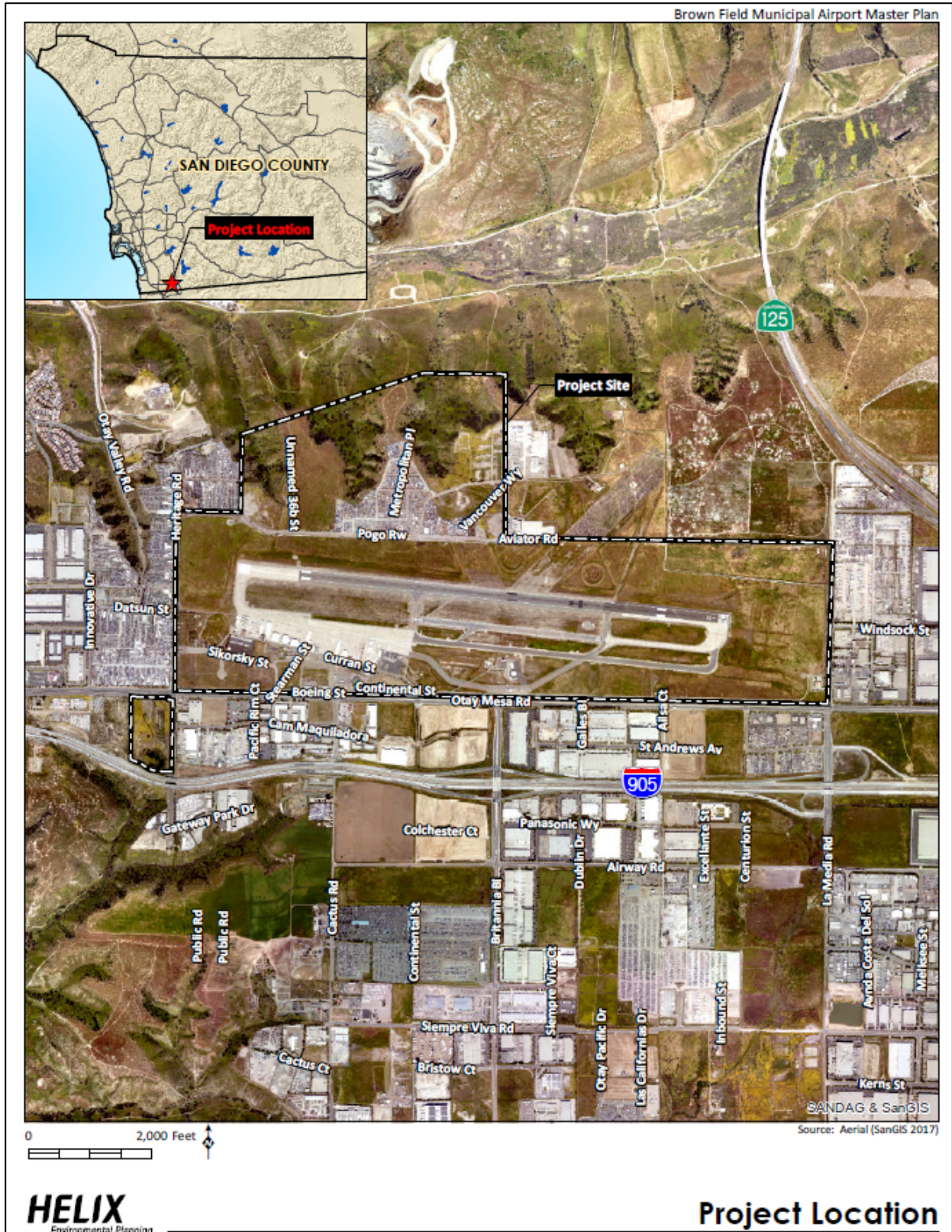
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A-1. USGS Maps (1950)



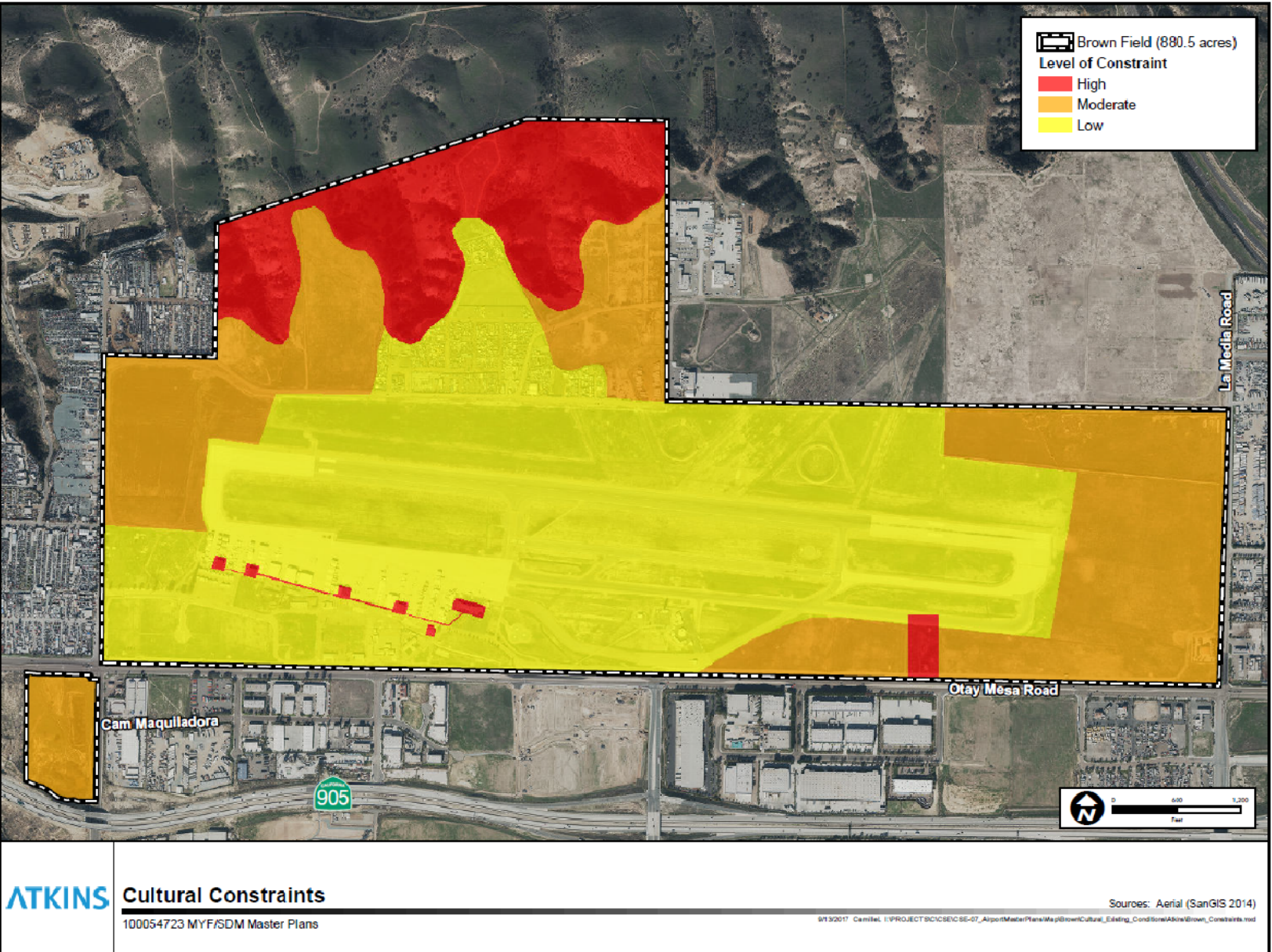
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A-2. Program EIR Project Location Map



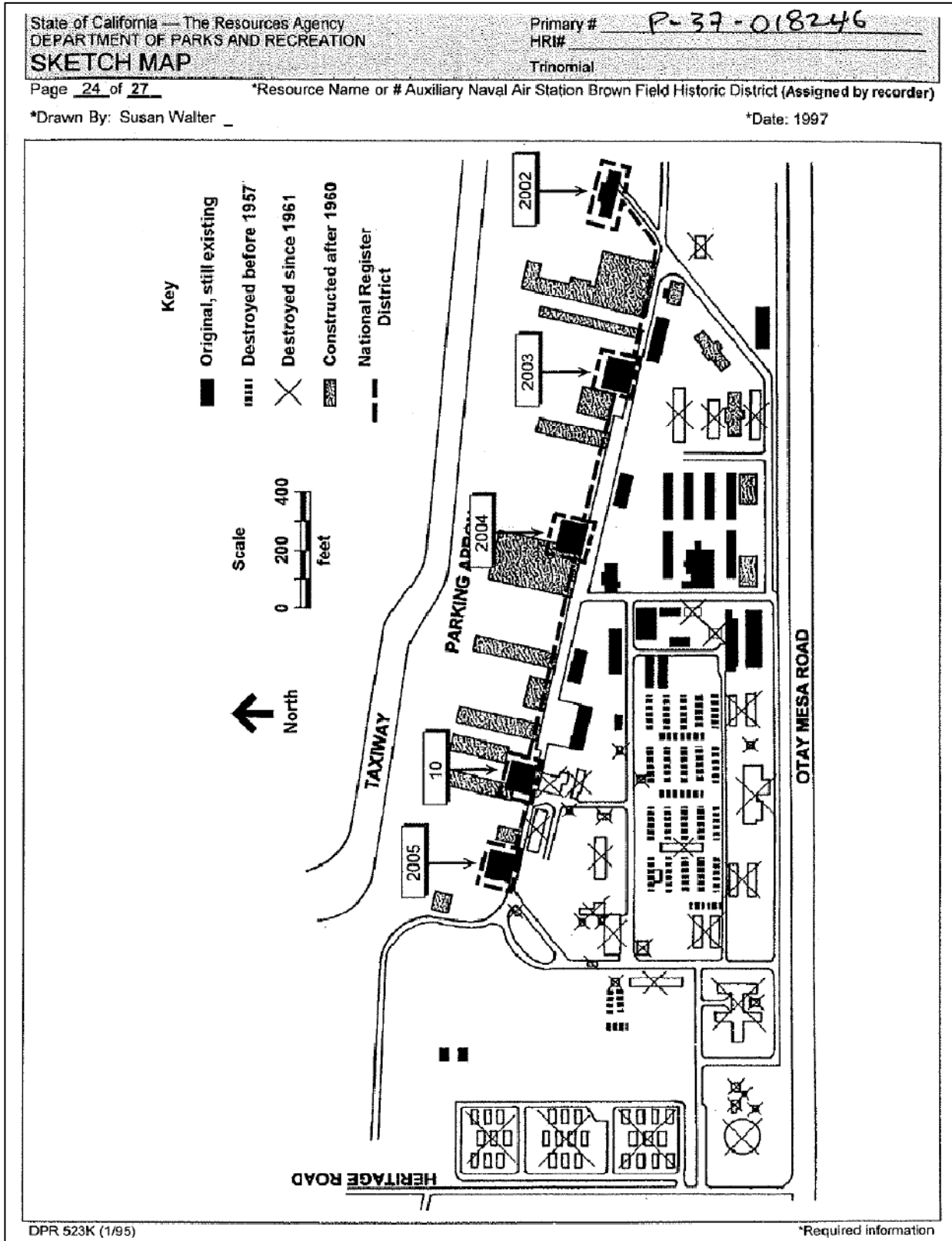
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A-3. Cultural Constraints Map



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A-4. Auxiliary Naval Air Base Brown Field Historic District Map



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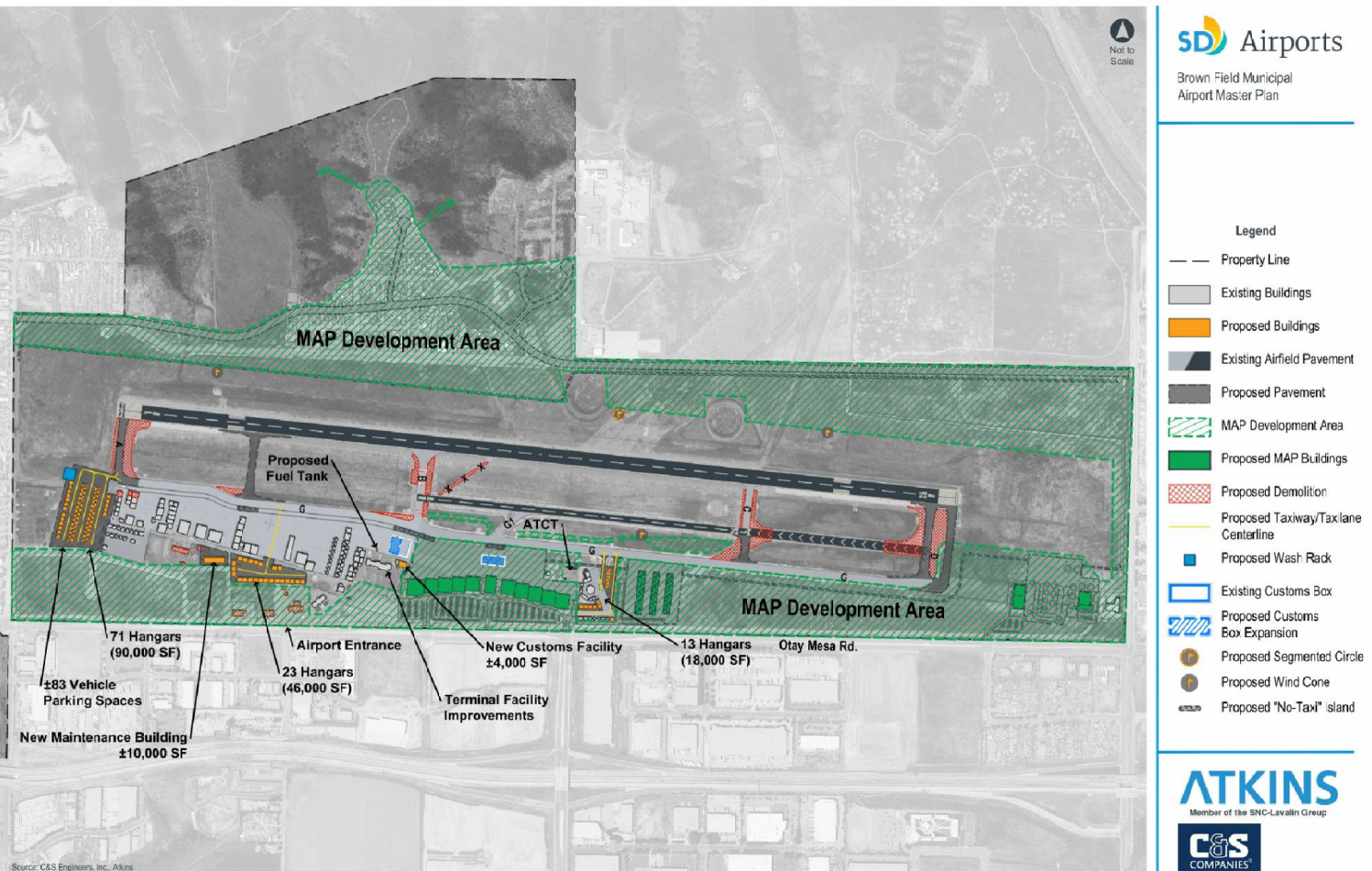
A-5. Building 2002 Site Map



Google Maps, 2019.

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A-6. 5-30-2024 Preferred Alternate Master Plan



Appendix B: DPR Forms

The previous site forms (1997 and 2010) are included, as well as an updated addendum with photographs from February 2019.

[DPR Forms Begin on the Next Page]

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Appendix C: Preparer's Qualifications

Ione R. Stiegler, FAIA
Principal Architect
IS Architecture

Ione R. Stiegler, FAIA is the Principal Architect for IS Architecture. Ms. Stiegler has considerable experience in the numerous issues distinctly associated with historic projects. Historic Preservation involves exhaustive studies and reports that determine the historic significance and optimal approach for each project. Ms. Stiegler has successfully prepared such reports for more than 70 structures, including historic register designations, building condition assessments, reconnaissance surveys, and HABS documentation. In addition, the firm possesses an expertise in the technical, aesthetic, building code, Americans with Disability Act (ADA), structural and agency review aspects of architectural design for historic structures. Ms. Stiegler's qualifications exceed the requirements established by the National Park Service, for History, Architectural History, Architecture, and Historic Architecture, as published in the Code of Federal Regulations, 36 CFR Part 61.

Rebecca McManus, MHP
Historic Preservation Specialist/Architectural Historian
IS Architecture

Rebecca McManus, MHP is a Historic Preservation Specialist and Architectural Historian at IS Architecture. Ms. McManus has project experience ranging from National Register of Historic Places nominations for a large-scale cultural landscape to numerous Historic Structure Reports, Cultural Resource Technical Reports for CEQA, HABS documentations, and determinations of eligibility on individual resources. Ms. McManus holds a Master of Historic Preservation degree from the University of Georgia and exceeds the requirements established by the National Park Service for History and Architectural History as published in the Code of Federal Regulations, 36 CFR Part 61.

Peter Kempson, MAH, MARCH
Historic Preservation Specialist/Associate Project Manager
IS Architecture

Peter Kempson, MAH & MARCH is a Historic Preservation Specialist at IS Architecture. Mr. Kempson has project experience ranging from work on historic structure reports, historic resource evaluations, local historic nominations, building condition assessment reports, Section 106 Compliance, and historic architectural design projects. These projects have been at Local, State, and Nationally Historic Designated Sites. Mr. Kempson holds Master of Architectural History and Master of Architecture degrees from the University of Virginia and exceeds the requirements established by the National Park Service for Architectural History and Historic Architecture as published in the Code of Federal Regulations, 36 CFR Part 61.