

# APPENDIX A

Addendum to Reconnaissance Level  
Historic Resources Survey Letter  
Report – Preliminary Impacts Analysis -  
Lone Star (CEMEX) Restoration/Reuse  
Project in Davenport, California,  
Wood, September 11, 2018





September 12, 2018

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**Re: Addendum to Reconnaissance Level Historic Resources Survey Letter Report – Preliminary Impacts Analysis - Lone Star (CEMEX) Restoration/Reuse Project in Davenport, California**

This addendum memorandum provides supplemental information to the *Reconnaissance Level Historic Resources Survey Letter Report (Report)* prepared on March 24, 2017 by Amec Foster Wheeler Environment & Infrastructure (now Wood) for the Lone Star (CEMEX) Restoration/Reuse Project (Project), located in Santa Cruz County, California. The Report summarized the results of a historical architectural resources reconnaissance survey conducted by Wood. Wood surveyed the closed CEMEX cement plant property and associated facilities located on State Route 1 approximately 11 miles north of the City of Santa Cruz in the town of Davenport. The purpose of the investigation was to identify and make preliminary evaluations for aboveground historic resources over 50 years of age at the facility for their potential eligibility for listing on the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR) and the Santa Cruz County Historic Resources Inventory (SCCHRI). The Report recommended that five (5) of the existing structures are potentially eligible individually as historic resources, including the Administration Building (Building 1), the Powerhouse (Building 7), the Control Room (Building 9), the Roundhouse (Building 17), and the Crocker Hospital (Building 22).<sup>1</sup> In general, these buildings maintain character defining features and retain structural integrity, as well as being older than 50 years in age. Moreover, these five structures could potentially contribute to a historic district encompassing the central concentration and linkages of structures, both historic and non-historic, within the former cement plant, though a historic district is not currently recorded on site.

The Report was requested by RRM Design Group on behalf of the County of Santa Cruz to inform site planning and design alternatives for the Project. To date, RRM Design Group has worked

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<sup>1</sup> The Powerhouse (Building 7), the Roundhouse (Building 17), and the Crocker Hospital (Building 22) were formerly inventoried and are currently listed on the California Register of Historical Resources (CRHR) and the Santa Cruz County Historic Resources Inventory (SCCHRI). The Report included these buildings and evaluated the Administration Building (Building 1) and the Control Room (Building 9) as additional historic resources, although they have not been recorded on the SCCHRI or the CRHR to date.

closely with the County of Santa Cruz (County) to develop three (3) land use scenarios for the Project. Each alternative comprises a mix of potential land uses that would result in demolition or reuse of the majority of the existing structures on site. Based on these alternatives, this memorandum provides a preliminary assessment of potential historic resource impacts to inform the Project's planning process and selection of a preferred alternative for further analysis, consistent with the California Environmental Quality Act (CEQA). This memorandum is not intended to suffice for full CEQA analysis of impacts to potentially historic resources or supplant the need for subsequent analysis during preparation of an appropriate CEQA document for the Project. As such, the conclusions and recommendations of this memorandum set forth initial conclusions regarding potential impacts of these alternatives on potentially historic resources but may be subject to change through further review and consideration.

### **Defining Significant Impacts to Historic Resources under CEQA**

The loss or change to significant historic resources on site, including individual buildings and a potential historic district, would have potentially significant impacts under CEQA. Per CEQA Guidelines Section 15064.5, a historical resource is defined as a resource listed or eligible for listing on the CRHR, a resource listed on a local register of historic resources (i.e., the SCCHRI), or any resource which a lead agency determines to be historically significant generally based on local and state eligibility criteria. Further, the fact that a resource is not listed or eligible for listing on the CRHR or local register or is not included in a historical resources survey does not preclude the lead agency from determining that a resource may be a historical resource subject to impacts analysis under CEQA.

Accordingly, the five surveyed and documented buildings that are recommended as significant historic buildings in the Report would be considered historic resources for the purposes of CEQA impact analysis, even though two of these buildings are not currently listed on the CRHR or SCCHRI. These five buildings are considered representative of the facility's period of significance from 1905/06 through the mid-1940s, including associations with historic events, historical figures, and significant architectural style or architect, as well as the ability to yield information about the history of the site, its relationship to California or national history and possible association with the lives of persons important to local, California, or national history. Further, the buildings on site, including the five significant historic structures as contributing structures, may constitute a potentially significant historic district. A significant impact would occur if the Project causes a substantial adverse change in the significance of an historical resource, such as demolition, relocation, or alteration of the resource or its surroundings, so that the resource is no longer eligible for listing in the CRHR or SCCHRI, per CEQA Guidelines.

A historic district is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development but may lack enough distinction to warrant eligibility individually, per National Register Bulletin #15. A district can vary in size and encompass a range of properties, structures, or objects that collectively contribute to the district's historic character and resource value. Properties within a historic district fall into one of two types of property: contributing and non-contributing. A contributing property, such as the historic Powerhouse (Building 7), is any property, structure or object which adds to the historical

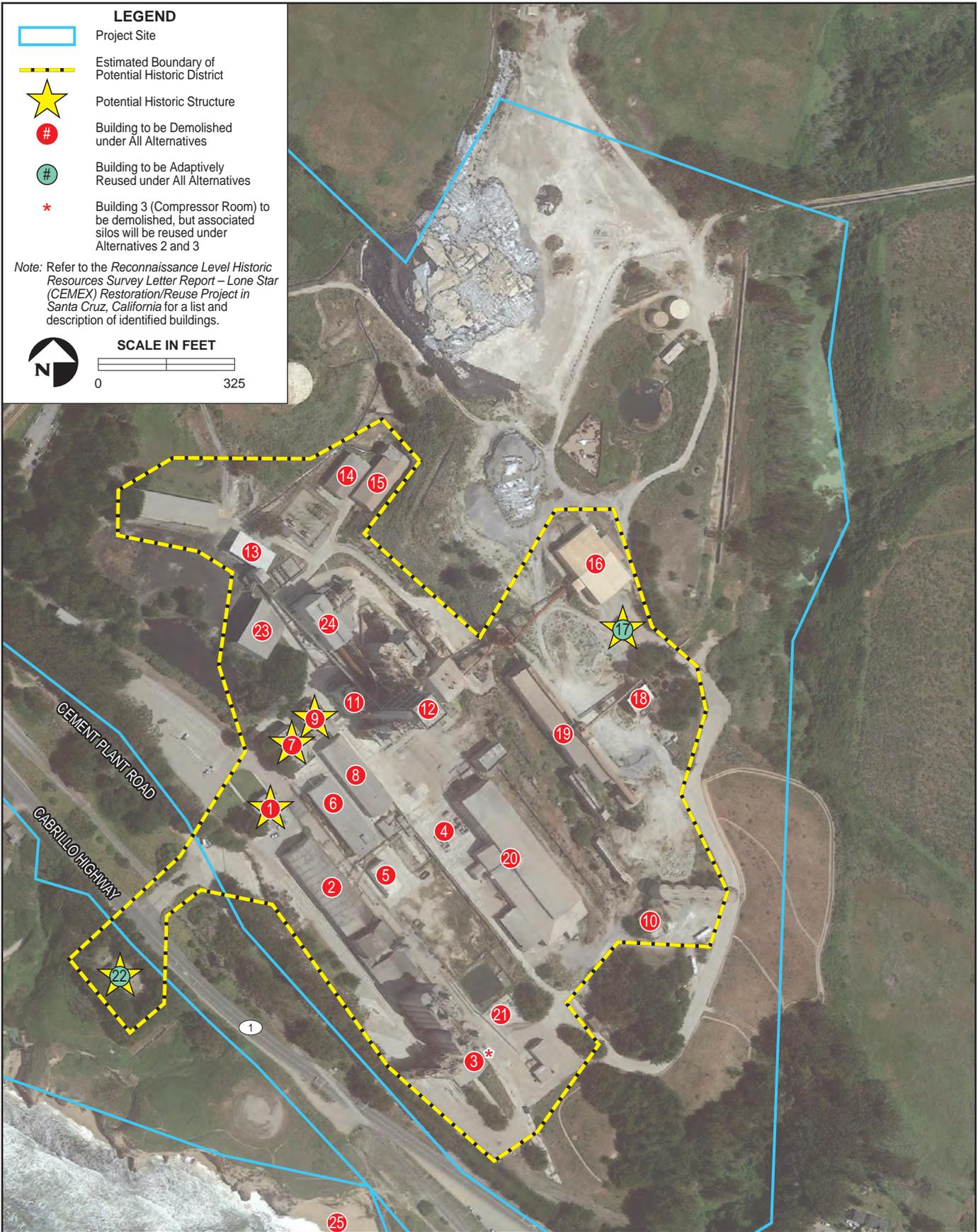
integrity or architectural qualities that make a historic district, listed locally or federally, significant. The contributing properties are key to a historic district's historic associations and historic architectural qualities, but buildings that are not individually eligible as historic resources may also be contained within the district. Non-contributing structures, such as the Rock Storage Building (Building 19) and Clinker Shed (Building 20) may not be individually significant but may support the historic composition and character that is essential to the historic district. A property can change from contributing to non-contributing and vice versa if significant alterations take place. Changes to properties that contribute to the historic district may have impacts to the historic district.

It is important to note that the Report only included a preliminary survey of existing buildings on site and recommended additional investigation to document archaeological resources associated with former buildings/foundations on site (e.g., the original kiln and first buildings on site), to fully evaluate and record all potentially significant historic resources on site, and to further evaluate the integrity of the potential historic district, as further described below.

### **Preliminary Assessment of Project Impacts**

This assessment of preliminary impacts to historic resources is based upon review of the *Demolition Cost Estimate Spreadsheet* and the Land Use Alternative figures provided to Wood by RRM Design Group, as well as the Report. Based on these materials, three alternatives are being considered; each alternative would require a similar scenario for building reuse and demolition (Table 1; Attachment A):

- **Alternative 1 – Eco Lodging & Visitor Serving.** This alternative would provide coastal lodging and campground with support services for visitors, as well as employee housing. The land use plan would lead to demolition of 21 existing buildings, including three potentially significant historic buildings (#1 – Administration Building, #7 – Powerhouse, and #9 – Control Room). Three buildings would be reused, including two potentially significant historic buildings (#17 - Roundhouse and #22 – Crocker Hospital).
- **Alternative 2 – Recreation Oriented Visitor Serving.** This alternative would provide coastal lodging with recreation amenities and connections to adjacent resources (i.e., San Vicente Redwoods) along with campgrounds and visitor serving uses, as well as employee housing. The land use plan would lead to demolition of 20 existing buildings, including three potentially significant historic buildings (#1 – Administration Building, #7 – Powerhouse, and #9 – Control Room). Four buildings would be reused, including two potentially significant historic buildings (#17 - Roundhouse and #22 – Crocker Hospital).
- **Alternative 3 – Senior Housing & Visitor Serving.** This alternative would provide a clustered senior housing community with coastal lodging and campground and visitor serving uses, as well as employee housing. The land use plan would lead to demolition of 20 existing buildings, including three potentially significant historic buildings (#1 – Administration Building, #7 – Powerhouse, and #9 – Control Room). Four buildings would be reused, including two potentially significant historic buildings (#17 - Roundhouse and #22 – Crocker Hospital)



**Table 1. Preliminary Impacts of Project Alternatives to Significant Historic Structures**

Land Use Alternative	Buildings Demolished	Historic Buildings Demolished	Building Area Demolished (sf)	Historic Building Area Demolished (sf)	Structures Reused <sup>1</sup>	Historic Buildings Reused
#1	21	3	268,608	26,982	3	2
#2	20	3	251,955	26,982	4	2
#3	20	3	251,955	26,982	4	2

<sup>1</sup> Alternatives 2 and 3 would reuse a portion of the Compressor Room (Building 3) associated with silos formerly used to store cement products.

Table 1 outlines impacts to historic structures under each of the alternatives. As shown, Alternative 1 would demolish 21 structures, and Alternatives 2 and 3 would demolish 20 structures, including significant historical buildings (Figure 1; Attachment A). No buildings would be relocated under any alternative.

Under all alternatives, three potentially historic buildings would be demolished:

- Administration Building (Building 1)
- Powerhouse (Building 7)
- Control Room (Building 9)

Under all alternatives, two potentially historic buildings would be adaptively reused:

- Roundhouse (Building 17)
- Crocker Hospital Building (Building 22).

Impacts to Individual Significant Historic Buildings

Each alternative would result in the demolition of three significant historic buildings and the reuse of two significant historic buildings. As the same potentially significant historic buildings would be demolished or adaptively reused, similar impacts to individual significant historic structures would occur under each alternative.



The Report revealed 5 existing structures on site that are significant historic resources, including Crocker Hospital (pictured), the Powerhouse, the Roundhouse, the Control Room, and the Administration Building.

The complete demolition of three historic resources would be considered a potentially significant impact under CEQA. While some measures would help to reduce the impact, including documenting the buildings thoroughly prior to demolition, providing indications/interpretive signage for their former locations and history, and informing future visitors about the buildings form and function, the complete loss of these buildings could not be fully mitigated, and the impact would be significant and unavoidable under CEQA Guidelines. Attachment B provides a general guide to and hierarchy of mitigation measures that could help reduce such impacts; however, absent preservation onsite and adaptive reuse of

such structures consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings*, such impacts would remain significant even with application of the mitigation measures derived and developed from Attachment B.

The reuse of two historic resources would also be considered potentially significant under CEQA. However, measures to ensure the Project follows the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings*, including preservation of character-defining features, materials, and site setting, would mitigate potentially impacts to less than significant, per CEQA Guidelines Section 15064.5(b)(4). This mitigation would need to be reflected in Project plans and the CEQA document and be fully enforceable through permit conditions or agreements.

### Impacts to a Potential Historic District

A historic district is not currently recorded on site. Per the Report's recommendations, the historic district would need to be fully evaluated and defined to inform the CEQA analysis of potential Project impacts, including historic structures, the contributing properties, and the period of significance, if it differs from that identified in the Report. However, this analysis presumes there is a reasonable potential for a historic district to be identified based on existing structures and their collective historic resource value.

The five potentially significant historic buildings currently on site would contribute to the potential historic district, which is estimated to encompass the central clustering of buildings that constitute the former cement plant and were collectively critical to the operation of the cement plant (Figure 1). These buildings and their locations on site are elements of the former cement plant that are "united by a shared history or physical design" and "pattern of development" and cumulatively represent important events and people in local and state history, as described in the Report. The other non-contributing structures onsite that are associated with the former cement plant's operation during the period of significance of 1905/06 through the



The potential historic district would comprise both contributing and non-contributing structures in the central area of the former cement plant. Photo source: *Disused cement factory* by flickr user Ningaloo.

mid-1940s are also reasonably considered to be important elements to the potential historic district. While not individually significant, these buildings are related to either administration, production/storage, power supply, employee services, or shipping, which were essential functions of the site as a cement plant. Therefore, they may contribute to the overall historic integrity of the site, including structures that are less than 50 years old, such as the highly visible Preheater Tower (Building 11) in the center of the site. Structures that are less than 50 years of age would

not contribute elements to the former cement plant's period of significance through the 1940s but would be subject to further evaluation.

All three alternatives under consideration would entail demolition of 80 percent or more of the existing structures onsite. Demolition of the Administration Building (Building 1), Powerhouse (Building 7), and Control Room (Building 9) under each alternative would eliminate key contributing properties to the potential historic district, which would undermine the integrity of the district and result in a significant and unavoidable impact under CEQA (see also Attachment A). Reuse of the Roundhouse (Building 17) and Crocker Hospital Building (Building 22) may retain these structures as contributing properties. The demolition of 20 to 21 non-contributing structures on site and development of the Project would eliminate the historic layout and design of the cement plant to where the historic significance of the site would not be apparent. However, with mitigation to adequately document and display the historical significance of the site, including documenting the buildings thoroughly prior to demolition, providing indications/interpretive signage and displays for their former locations and history, and informing future visitors about the buildings form and function, the impact to the potential historic district could be mitigated to a less than significant level (see Attachment B). However, further investigation to evaluate the historic district, define its significance, and develop a robust conservation and interpretive plan would be required to reach a conclusion regarding impact significance. Further, demolition of any one of the contributing elements of the potential historic district would appear to result in a significant impact on the potential district as a historical resource.

## **Conclusions and Recommendations**

As described above, the demolition of the Administration Building (Building 1), Powerhouse (Building 7), and Control Room (Building 9) under each alternative would have a significant and unavoidable impact to historic resources, even with mitigation. Nonetheless, additional investigation and evaluation and development of a mitigation program for adaptive reuse would help to minimize potentially significant impacts, particularly associated with the Roundhouse (Building 17) and Crocker Hospital Building (Building 22) and the potential historic district. While Project analysis under CEQA would require development of mitigation measures for potentially significant impacts, this memorandum includes several recommended actions below as part of the Project planning process to inform CEQA analysis. Please see also Attachment B for a list of conceptual mitigation measures likely to be required under future CEQA review.

It should be noted that the Report and this preliminary impact assessment is not a substitution for a full historic architectural investigation and cannot be used to meet the requirements of Section 106 of the NHPA of 1966, CEQA Statutes, or Chapter 16.42 of the Santa Cruz County Code. As such, Wood recommends that a full Section 106 architectural survey and CEQA impact analysis be conducted at the Davenport Cement Plant to determine the structures' eligibility for listing on the National Register of Historic Places (NRHP), CRHR, and/or SCCHRI, both individually and as contributing resources to a potential historic district. Moreover, additional research as part of a full Section 106/CEQA investigation could help identify further insights and information pertaining to the site's history and significance that could not be ascertained within the scope of this study. Specifically, Wood recommends the following additional research and actions to

address historic resources related to the Davenport Cement Plant property. Detailed examples of potential mitigation measures are also provided in Attachment B.

1. Conduct a full cultural resources survey and full historic architectural investigation for the site that complies with Section 106 of the National Historic Preservation Act (NHPA), Public Resources Code Statute §21084 and §5024.1 of CEQA, and Chapter 16.42, *Historic Preservation*, of the Santa Cruz County Code.
2. Investigate the site as a potential historic district consistent with National Register Bulletin #15.
3. Determine local historical significance of the site (as a whole comprising the structures on site) to the Santa Cruz community through consultation with County staff.
4. Schedule County Historic Resources Commission review of the site, relevant reports and potentially significant structures to help determine the eligibility of the site and the individual historic buildings for listing on the National Register or state and local registers.
5. Confirm the period or periods of significance for the site for the purposes of CEQA impacts analysis.
6. Investigate potential archaeological resources associated with foundations and subterranean features of the site that supported former operations of the cement plant during the period(s) of significance.
7. Employ adaptive reuse to the extent feasible for the five potentially significant structures because their use and condition best characterize main components of the former cement plant, including administration, power supply, employee services, and shipping.
8. Utilize a professional architectural historian to advise the design team and ensure that character-defining elements were retained in the architectural plans for the site and any building reuse.
9. If feasible, consider relocation and reuse rather than demolition of the Administration Building (Building 1), Powerhouse (Building 7), and Control Room (Building 9) to appropriate settings that retain the integrity of the individual buildings and the potential historic district.
10. Develop a robust site conservation, documentation, and interpretation plan as part of the Project to integrate education materials, signage, and other interpretive displays into the visitor experience for the future land use plan for the site, including retaining historic equipment, interactive displays, literature, and photo-documentation. Conservation of key site features, such as structural elements (e.g., windows), unique equipment or machinery used in the cement making process during the period(s) of significance, or iconography of Santa Cruz Cement, shall be included in the plan.

If you have any questions or comments regarding this preliminary Historic Architectural Resources Survey Letter Report, please contact Ms. Erika Leachman at (805) 962-0992 or Mr. Matthew Prybylski at (502) 267-0700.

Sincerely,



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Project Manager – Environmental Planning



Matthew Prybylski, MHP  
Senior Architectural Historian

**Attachments**

- A - Historic Structures Proposed for Demolition or Reuse
- B - Example Mitigation Measures for Historic Resource Impacts

## Attachment A: Historic Structures Proposed for Demolition or Reuse

Table 1-A. Historic Structures Proposed for Demolition

Photograph	Building Number and Construction Date	Building Use	Preliminary Recommendation
	<p>Building 001 c. 1925</p>	<p>Main Administration Building</p>	<p>Potentially Eligible individually and as a contributing resource to a historic district based on historic significance as the site where high level decisions were made in association with the production, innovations, and/or upgrades to the Davenport Cement Plant. Additional research and documentation is recommended to further assess the historic significance of the resource.</p>
	<p>Building 007 1905</p>	<p>Powerhouse</p>	<p>Previously listed on the CRHR and listed on County Historic Resources Inventory. Recommended Eligible due to its historic significance as the main power supply for the entire Davenport Cement Plant, without which the site could not have functioned. Additional research and documentation is recommended to further assess the historic significance of the resource as a contributing structure of a potential historic district.</p>
	<p>Building 009 c. 1925</p>	<p>Control Room</p>	<p>Potentially eligible individually and as a contributing resource to a historic district based on historic significance as the site where the primary mechanisms essential to the Davenport Cement Plant's function were located. Additional research and documentation is recommended to further assess the historic significance of the resource.</p>

**Attachment A: Historic Structures Proposed for Demolition or Reuse**

**Table 2-A. Historic Structures Proposed for Reuse**

Photograph	Building Number and Construction Date	Building Use	Preliminary Recommendation
	<p>Building 017 1905</p>	<p>Roundhouse</p>	<p>Previously listed on the CRHR and listed on County Historic Resources Inventory. Recommended Eligible due to its historic significance as an essential structure for shipping finished materials to construction sites across the US, most significantly to sites following the 1906 San Francisco earthquake, without which the site could not have function. Additional research and documentation is recommended to further assess the historic significance of the resource as a contributing structure of a potential historic district.</p>
	<p>Building 022 1912</p>	<p>Hospital</p>	<p>This structure is considered eligible due to historic and architectural significance and has been previously listed on the CRHR and listed on County Historic Resources Inventory. The building maintains structural and historic integrity. Additional research and documentation is recommended to further assess the historic significance of the resource as a contributing structure of a potential historic district.</p>

## Attachment B: Example Mitigation Measures for Historic Resource Impacts

The following provide example of potential mitigation that could address preliminary impacts to historic resources identified in this memorandum but are subject to change through future CEQA review of the project.

1. **Site Evaluation.** Prior to any demolition or significant alteration of the proposed project site, a historian and/or architectural historian selected by the County who meets the Secretary of Interior's Professional Qualifications Standards shall prepare a full cultural resources survey and full historic architectural investigation for the site that complies with Section 106 of the National Historic Preservation Act (NHPA), Public Resources Code Statute §21084 and §5024.1 of CEQA, and Chapter 16.42, Historic Preservation, of the Santa Cruz County Code, and investigate the site as a potential historic district consistent with National Register Bulletin #15. Based on this investigation, any historic resources shall be recorded as appropriate on federal, state, and or local registers.
2. **Photo-Documentation and Publication.** The historic structures shall be documented in accordance with the procedures of the Historical American Buildings Survey (HABS) Level I through measured drawings, a written account of the history and architecture of the structure, and contemporary black-and-white and large format negatives, proofs, and 8x10 inch archivally-processed prints of the interior and exterior of the structure, as well as the surrounding setting; such documentation shall be performed by an architectural historian selected by the County who meets the Secretary of Interior's Professional Qualifications Standards. A historical landscape photographer with experience documenting historic buildings and sites shall record the setting of the historic district. This documentation shall include multiple images of all buildings and developed areas of the site. Upon review and approval of this documentation by the County, the original full report with narrative, photographic negatives, and prints shall be submitted to the Library of Congress and the Santa Cruz Public Library System prior to the issuance of any permits for demolition, excavation, or new construction. Copies of the full report and prints shall be placed on file for open public review at the County Planning Department, Central Coast Information Center of the California Historical Resources Information System, the Davenport Jail Museum, and the project's proposed visitor center; photocopies and digital copies shall be retained in the project file.
3. **Review Adaptive Reuse Plans.** Prior to issuance of demolition permits, the County Historic Resources Commission shall review the proposed plans for the adaptively reused buildings, including façades and character-defining features, to ensure they meet Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings*, and shall forward a recommendation to the Planning Commission, who will take the action on the design plans for the proposed project. Retention and preservation of all significant character defining features or contributing character defining features shall be reflected in the reuse design plans, in compliance with the Secretary of the Interiors *Standards for the Treatment of Historic Properties with Guidelines for Rehabilitating*

*Historic Buildings*, under the supervision of a qualified preservation architect selected by the City.

4. **Historic Resource Conservation and Interpretive Plan.** Resources that cannot be preserved shall be acknowledged by incorporating historic signage and reusing or displaying historic materials and artifacts, such as unique equipment used in cement making, building features, and iconography of the former cement plant. For example, the reuse of some of the interior roof trusses, the conveyors or machinery, and the signs on site shall be retained, displayed, and interpreted for visitors on site. Text and photographic exhibits capturing the history of the building and/or site shall be incorporated into a public area(s) of the project, including the project's proposed visitor center.
5. **Historic Building Relocation.** If required, any historic buildings or resources that would be relocated on site shall be moved by a qualified contractor with experience in moving historic structures in accordance with the approaches recommended in *Moving Historic Buildings* (Curtis 1979). The buildings must retain their current configuration when reinstalled. All work shall comply with the Secretary of the Interiors *Standards for the Treatment of Historic Properties with Guidelines for Rehabilitating Historic Buildings*, under the supervision of a qualified preservation architect selected by the County.