

5.4 Cultural Resources

The analysis in this section of the EIR addresses the potential impacts associated with cultural resources that may occur due to implementation of the proposed Collier Park Renovations Project Master Plan. The following discussion includes information based on the Cultural Resource Survey prepared by Noah Archaeological Consulting (2009), which is provided as Appendix D of this EIR, and the Historic Resources Evaluation Report prepared by ASM Affiliates, Inc. (2012), which is provided as Appendix E of this EIR.

5.4.1 Regulatory Framework

5.4.1.1 Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) of 1966 established the framework that focused local, state, and national efforts with regards to the preservation of historic and archaeological resources. Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties, and afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment. The historic preservation review process mandated by Section 106 is outlined in regulations issued by ACHP (36 CFR Part 800). The Section 106 process involves efforts to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties. In order to help identify these historic properties and provide community involvement, consulting parties are identified through coordination with the appropriate State Historic Preservation Officer and/or Tribal Historic Preservation Officer.

National Register of Historic Places

The NHPA established the National Register of Historic Places (NRHP) as the official federal list of cultural resources that have been nominated by state offices for their historical significance at the local, state, or national level. The NRHP, which is administered by the National Park Service, is “an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.” Listing on the NRHP assists in preservation of historic properties through the following actions: formal recognition a property’s historical, architectural, or archaeological significance; consideration in planning for federal, federally licensed, or federally assisted projects; eligibility for federal tax benefits; consideration of historic values in the decision to issue a surface mining permit; and qualification for federal grants for historic preservation, when funds are available.

A property may qualify for NRHP listing if the quality of significance in American history, architecture, archeology, engineering, and culture is present in a district, site, building, structure, or object that possesses “integrity” (described below) and it meets at least one of the following criteria:

- **Criterion A:** Is associated with events that have made a significant contribution to the broad patterns of history.
- **Criterion B:** Is associated with the lives of persons significant in the past.

- **Criterion C:** Embodies the distinctive characteristics of a type, period, or method of construction; or represents the work of a master; or possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.
- **Criterion D:** Has yielded, or may be likely to yield, information important in prehistory or history.

As noted above, in order to be eligible for listing on the NRHP, a property must also retain sufficient integrity, which is “the ability of a property to convey its significance.” The evaluation of integrity must be grounded in an understanding of a property’s physical features, and how they relate to the concept of integrity. Determining which of these aspects are most important to a property requires knowing why, where, and when a property is significant. To retain historic integrity, a property must possess several, and usually most, of the following seven aspects of integrity:

- 1) Location—the place where the historic property was constructed or the place where the historic event occurred.
- 2) Design—the combination of elements that create the form, plan, space, structure, and style of a property.
- 3) Setting—the physical environment of a historic property.
- 4) 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.
- 5) Workmanship—the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory.
- 6) Feeling—a property’s expression of the aesthetic or historic sense of a particular period of time.
- 7) Association—the direct link between an important historic event or person and a historic property.

The relevant aspects of integrity depend upon the NRHP criteria applied to the property. For example, a property nominated under Criterion A (events) would be likely to convey its significance primarily through integrity of location, setting, and association. A property nominated under Criterion C (design) would usually rely primarily on integrity of design, materials, and workmanship.

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the NRHP. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within any of the following categories:

- a) Religious property deriving primary significance from architectural or artistic distinction or historical importance;
- b) Building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event;

- c) Birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life;
- d) Cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- e) Reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- f) Property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- g) Property achieving significance within the past 50 years if it is of exceptional importance.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) is a federal law passed in 1990, which provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants, and culturally affiliated Indian tribes and Native Hawaiian organizations. NAGPRA includes provisions for unclaimed and culturally unidentifiable Native American cultural items, intentional and inadvertent discovery of Native American cultural items on federal and tribal lands, and penalties for noncompliance and illegal trafficking.

5.4.1.2 State

California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5, Disturbance of Human Remains, establishes intentional disturbance, mutilation, or removal of interred human remains as a misdemeanor and specifies protocol for the inadvertent discovery of human remains. In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, Section 7050.5(b) requires that there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the County Coroner has determined the circumstances, manner, and cause of death, and has provided recommendations concerning the treatment and disposition of the human remains. If the human remains are recognized or believed to be those of a Native American, Section 7050.5(c) requires the County Coroner to contact the NAHC by telephone within 24 hours.

California Native American Graves Protection and Repatriation Act

The California NAGPRA, enacted in 2001, requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California NAGPRA also provides a process for the identification and repatriation of these items to the appropriate tribes. Implementation of the proposed project would be conducted in compliance with the California NAGPRA.

California Public Resources Code Section 5097.9

California Public Resources Code 5097.9 prohibits interference with Native American religion or damage to cemeteries or places of worship and requires the NAHC to immediately notify the most likely descendants when it receives notification of a discovery of Native American human remains pursuant to California Health and Safety Code 7050.5 (described above). Section 5097.98(a) allows the most likely descendants, with permissions from the landowner, to inspect the site of discovery and make recommendations for the treatment and disposition of the Native American human remains and any associated grave goods within 48 hours of their notification by the NAHC. Section 5097.98(b) requires the landowner to ensure that the immediate vicinity of the Native American human remains is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations and preferences for all reasonable treatment options, which may include the following:

- a) Nondestructive removal and analysis of the Native American human remains and associated items.
- b) Preservation of the Native American human remains and associated items.
- c) Relinquishment of the Native American human remains and associated items to the descendants for treatment.
- d) Other culturally appropriate treatment.

California Register of Historical Resources

Created by Assembly Bill 2881, which was signed into law on September 27, 1992, the California Register of Historic Resources (CRHR) is defined as “an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change” (Public Resources Code Section 5024.1(a)). The criteria for eligibility for the CRHR are based upon NRHP criteria (Public Resources Code Section 5024.1(b)). In order to be eligible for listing on the CRHR, a prehistoric or historic property must be significant at the local, state, and/or federal level under at least one of the following criteria:

- **Criterion 1:** Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- **Criterion 2:** Is associated with the lives of persons important in our past.
- **Criterion 3:** Embodies the distinctive characteristics of a type, period, region, or method of construction; or represents the work of an important creative individual; or possesses high artistic values.
- **Criterion 4:** Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one of the criteria above, a historic resource eligible for CRHR listing must retain enough of its historic character or appearance to be recognizable as a historical resource and to convey the reason for its significance (integrity). It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing on the NRHP, but may still be eligible for listing on the CRHR.

The CRHR consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. Resources that are automatically listed on the CRHR include the following:

- California properties listed on the NRHP and those formally determined eligible for the NRHP;
- California Registered Historical Landmarks from No. 770 onward; and
- California Points of Historical Interest that have been evaluated by the Office of Historic Preservation and have been recommended to the State Historical Commission for inclusion on the CRHR.

Other resources that may be nominated to the CRHR include the following:

- Historical resources identified as eligible for listing on the NRHP, the CRHR, and/or a local jurisdiction register;
- Individual historical resources;
- Historical resources contributing to historic districts; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

CEQA Guidelines Section 15064.5

Section 15064.5 of the CEQA Guidelines provides guidance on determining the significance of impacts to archaeological and historical resources. The term “historical resources” is defined to include the following:

- 1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR.
- 2) A resource included in a local register of historical resources (as defined in California Public Resources Code Section 5020.1(k)) or identified as significant in a historical resource survey (meeting the requirements of California Public Resources Code Section 5024.1(g)), unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- 3) Any object, building, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant to the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.
- 4) The fact that a resource does not meet one of the above-listed criteria does not preclude a lead agency from determining that the resource may be a historical resource.

A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. A substantial adverse change in the significance of an historical resource means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. The significance of an historical resource is materially impaired when a project demolishes or alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR, or that account for its inclusion in a local register of historical resources.

5.4.1.3 Local

City of La Mesa General Plan

The Historic Preservation Element of the adopted La Mesa General Plan (City of La Mesa 1996) includes the following historic preservation policies and objectives:

Historic Preservation Policies

- 1) The City will foster community pride through identification and improvement of historic sites, buildings, and districts.
- 2) The City will seek to further the recognition by La Mesans that districts, sites, buildings, structures, and other objects of historic importance will increase in both fiscal and community value.
- 3) The City will promote public exposure to La Mesa's history by encouraging the use of historic and cultural sites and districts for both educational and practical purposes.
- 4) The City will preserve the historic and cultural contributions of individuals, groups, and organizations to the history of La Mesa.
- 5) The City will seek to interest visitors and tourists in La Mesa by providing opportunities to perceive the character, structures, and activities of our past.
- 6) The City will include plans for the preservation of historic and cultural sites and structures in La Mesa's development review process.

Historic Preservation Objectives

- 1) Maintain an updated historic preservation brochure or newsletter which describes La Mesa's historic resources, policies, and programs.

The Historic Preservation Element also contains the La Mesa Historic Resources Inventory, which is a three-tiered designation system for local historic and cultural resources consisting of: 1) the overall Historic Resources Inventory; 2) the Potential Landmark Listing; and 3) the Historic Landmark Register. Collier Park and the Spring House are included in the La Mesa Historic Resources Inventory and have been designated on the Historic Landmark Register.

City of La Mesa Historic Preservation Ordinance

La Mesa Municipal Code Title 25, Historic Preservation, implements the goals of the Historic Preservation Element of the La Mesa General Plan. Section 25.01.060 created the Historic Preservation Commission and established their powers and duties. Section 25.03.010 identifies the Historic Landmark and Historic District Designation Criteria. The ordinance states that a cultural resource may be recommended for designation as a Historic Landmark or Historic District if it meets one or more of the following criteria:

- A. It exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, or architectural history; or
- B. It is identified with persons or events significant in local, state, or national history; or

- C. It 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; or
- D. It is representative of the notable work of an acclaimed builder, designer, or architect; or
- E. It is identified with a person or persons or groups who significantly contributed to the culture and development of the City; or
- F. It embodies elements of outstanding attention to architectural design, detail, materials or craftsmanship; or
- G. It is an archeological or paleontological site which has the potential of yielding information of scientific value; or
- H. It is a geographically definable area possessing a concentration of sites, buildings, structures, improvements, or objects linked historically through location, design, setting, materials, workmanship, feeling, and/or association, in which the collective value of the improvements may be greater than the value of each individual improvement.

Demolition of any designated Historic Landmark or any contributing structure within a designated Historic District is prohibited, except in accordance with the provisions of Section 25.03.060, which requires City Council approval of a demolition permit based on the recommendation of the Historic Preservation Commission.

5.4.2 Existing Conditions

5.4.2.1 Defining Cultural and Paleontological Resources

Cultural resources include prehistoric resources and historic resources. Prehistoric resources are physical properties resulting from human activities that predate written records and are generally identified as isolated finds or sites. Prehistoric resources can include village sites, temporary camps, lithic (stone tool) scatters, roasting pits/hearths, milling features, rock features, and burials. Historic resources are physical properties, structures, or built items resulting from human activities after the time of written records. In North America, the historic period is generally considered to be equivalent to the time period since European contact, beginning in A.D. 1492. Historic resources can include archaeological remains and architectural structures.

Paleontology is a branch of geology that studies the life forms of the past, especially prehistoric life forms, through the study of plant and animal fossils. Paleontological resources are the fossilized remains or traces of multi-cellular invertebrate and vertebrate animals and multi-cellular plants, including their imprints from a previous geologic period. Fossil remains, such as bones, teeth, shells, and leaves, are found in the geologic deposits (rock formations) where they were originally buried, and are important because they provide indicators of the earth's chronology and history. Paleontological resources include not only the actual fossil remains, but also the collecting localities and the geologic formations containing those localities. Paleontological resources represent a limited, non-renewable, and impact-sensitive scientific and educational resource.

5.4.2.2 Cultural Setting

Precontact Period

Native Americans have occupied San Diego County over the past 10,000 years. The period from 10,000 to 1,300 years ago is referred to as the Early Period or Archaic Period. The San Dieguito are generally accepted as the first inhabitants of the region, occupying San Diego County as early as 10,000 years ago. The initial occupation, usually referred to as the San Dieguito complex, is believed to represent a people who entered San Diego County from the desert and/or through coastal migration. These people hunted, fished, milled plant foods, and collected and processed shellfish and fish. The occupation from roughly 8,300 to 1,300 years is also referred to as the La Jolla complex and Pauma complex. Archaeological sites reflecting this occupation are coastal shell midden habitation sites, inland hunting and milling campsites, and quarry sites. The San Dieguito and La Jolla/Pauma complexes are believed by many to be of the same cultural stock, representing one long period of occupation by one people.

Occupation after 1,300 years, referred to as the Late Period, is well documented by the numerous Kumeyaay/Diegueno and Luiseno habitation sites. Artifacts and cultural patterns reflecting this Late Period occupation include small projectile points, pottery, obsidian from Obsidian Butte in the Colorado Desert, and cremations.

Ethnographic Background

Collier Park falls chiefly within ethnographically recorded Kumeyaay territory. The Yuman-speaking Kumeyaay were organized into patrilineal clans. Kumeyaay territory extended from the Pacific Ocean to the Colorado Desert; however, at least during the historic period, territorial groups may have focused their seasonal movements within a subset of possible environments such as within a coast to mountain region or between the mountain and the desert. The people primarily subsisted on hunted and gathered resources with minimal horticultural practices. Summer domiciles consisted of simple windbreak or sometimes caves fronted with rocks, and winter houses were slightly sunken dome or gable-shaped brush structures.

Historic Period

Although the earliest historical exploration of the San Diego area can be traced to 1542 with the arrival of the first Europeans, particularly the exploration of San Miguel Bay by Juan Rodriguez Cabrillo, the widely accepted start of the Historic Period is 1769 with the founding of the joint Mission San Diego de Alcalá and Royal Presidio. The Spanish Colonial portion of the Historic Period (1769-1822) includes the Hispanic intrusion and colonization within Native American southern California, which affected the coastal tribes and peoples living in well-travelled river valleys. The Mexican Republic portion of the Historic Period (1822-1848) saw the continued displacement of the native population by expansion of a land grant program and development of extensive ranchos. The gold rush and the associated granting of statehood in 1850, combined with an influx of Europeans, caused the growth of agricultural communities and towns and the rapid displacement of the native population, as well as the deterioration of their culture and way of life.

5.4.2.3 Collier Park History

The natural springs, located in what is today Collier Park, were first utilized by the Kumeyaay Indians for whom the springs were a seasonal stopping place because of their medicinal qualities, and were thereafter known as Indian Springs. During the Spanish Period, the land surrounding the springs was part of the once-extensive grazing lands of Mission San Diego, which was established in 1769 by Spanish Franciscan missionaries. With the secularization of the missions by the Mexican government in 1832, extensive land grants were given to loyal Mexican citizens. In 1846, roughly 60,000 acres of ex-Mission land were granted to Santiago Arguello, a former commandant of the San Diego Presidio. In 1868, Robert Allison purchased 4,282 acres of land from heirs of the Arguello, which included what is now the downtown area of La Mesa and present-day Collier Park. Allison used the springs as a source of water for his family's sheep herds.

In 1905, Colonel David C. Collier purchased a substantial portion of land in southern La Mesa, including the area known today as Collier Park. Collier played an influential role in the development of La Mesa. He initially purchased Allison's property with the intention of building a country estate for himself; however, his plans shifted to develop the land in other ways, which included capitalizing on the natural springs by erecting a bottling works from which he would sell the water in five-gallon units. In late 1907, the bottling works was completed, the remains of which is known today as the Spring House. The bottling works contained a storage reservoir into which the spring water was pumped. A well 100 yards away from the bottling works captured the water from one of the three springs on the site, which was then brought to the bottling works by way of a vitrified pipeline, two feet in diameter. The bottling works was constructed with locally quarried squared stones, with cement mortar and all framing plastered in cement rubble. A fountain (no longer extant) was later erected southwest of the Spring House for easier dispensation of the water.

In 1910, Collier donated five acres of land to the people of La Mesa for the establishment of a park, primarily west of Palm Avenue and south of Pasadena Avenue. Later that year, the Collier Park Association was incorporated for the purpose of acquiring additional land and improving that already donated by Collier. Only the northwestern corner of the current park, east of Palm Avenue, was part of Collier's donation. It is likely that this section of the park was the original location of an early well that drew on the spring water to irrigate the park's landscaping and supply the park's fountains. It was initially hoped that this well could also supply other city parks as they were created.

Collier sold the springs and the remaining portions of what is now Collier Park to the Union Title and Trust Corporation at some point prior to 1914. The La Mesa Springs Corporation purchased the 14-acre parcel surrounding the springs in January of 1914. That same year, the City of La Mesa called for a special bond election to purchase that land for "water purposes." The bond passed, and the City acquired the land on March 22, 1915. A second bond that would have allowed the City to purchase Collier Park from the Collier Park Association was also proposed, but failed. The City did not pursue that further, and the Association eventually sold the land to private owners in 1920. The eastern section of that parcel (approximately 3 acres) is today the oldest portion of Collier Park, acquired by the City at some time before 1920.

In 1915, shortly after the acquisition of the springs by the City, the water was piped to a drinking fountain 0.25-mile away in downtown La Mesa at the corner of La Mesa Boulevard and Spring Street. The City also began plans at that time to further develop the "park adjoining the springs," although

further improvements to the landscape were not undertaken until 1920. At that time, plans were announced that the City would be undertaking landscaping and the construction of driveways, restrooms, and a pool. Funds were raised by community events, and the Spring House was converted into dressing rooms for the pool. The pool, at the southwest corner of the park, was completed in 1921, and tennis courts were built directly east of the pool in 1922. The pool was plagued by walls that caved in repeatedly after heavy rains, and its use was discontinued by the mid-1930s. Although the City pursued the construction of a new pool through the Works Progress Administration, those plans did not materialize. The pool was eventually filled in and replaced by new tennis courts in the late 1940s. At one time the park contained a caretaker's residence erected in 1924 east of the Spring House, the foundation of which is all that now remains.

By the 1930s, the name Collier Park applied to the entire area currently referred to as such, including eight undeveloped acres east of 4th Street that were eventually sold in 1945. The sale of that parcel was the last change in the boundaries of the park, which today is visibly defined by Palm Avenue to the west, 4th Street to the east, and the neighborhood development that has since been erected to the north and south. By the mid-1940s, the condition of the park had deteriorated and a group of 25 female gardening students, inspired by a *Better Homes and Gardens* magazine contest, received approval from the La Mesa City Council to undertake a beautification project to revitalize the then aging community park. Taking their name from the old bottling works building, the Spring House Garden Club, with assistance from the City, began renovation in 1948. The group renovated the Spring House as a meeting space and added a pergola covered with bougainvillea. Landscape improvements included new flower beds and the plantings, specifically succulents, on the hillside east of the springs. The roads were graded and a new restroom was constructed. The park was rededicated on September 19, 1948, and the project won third place in the *Better Homes and Gardens* contest for its division (towns of 10,000 to 100,000). A bronze plaque was placed on the interior of the Spring House. The Spring House received a new roof, suspended ceiling, new floors, and new glass panes during the beautification project, and shortly thereafter a fireplace was added to the east wall. A portion of the wall and foundation were also reconstructed at this time.

The park particularly served La Mesa's school-age population. A large playground was erected at the park in late 1940s. Prior to the Spring House Garden Club's improvements, the City had already undertaken plans to move a building to the southeastern corner of the park for use as a Boy Scouts camp, dedicated as the Wa-di-ta-ka La Mesa Boy Scout Memorial Camp in 1948 (building demolished sometime post 1960s). Perhaps in response to the boy's camp, the women of the Spring House Garden Club included a campfire circle for the local Campfire Girls as part of their overall 1948 park improvements.

The drinking fountain erected in 1915 to bring spring water downtown was threatened by a street-widening project in the 1960s. In response to community support and donations, the City Council moved to disassemble and reconstruct the fountain in Collier Park, just south of the Spring House. The original roof framing and tiles were preserved, while the stucco base was replaced with brick. The relocated fountain was completed in July of 1965.

The park still continues in its original function as a recreational space for the residents of La Mesa. The Spring House was used for meeting space until it reached such a point of deterioration that it was closed and boarded up in 1981. The 1940s playground equipment was replaced within the past few decades. Grass was planted throughout the park at some point past 1952.

5.4.2.4 Known Cultural Resources

A Cultural Resource Survey was conducted for the search area encompassing Collier Park and a one-half mile radius around the park (Noah Archaeological Consulting 2009). The records search performed at the South Coastal Information Center identified 47 historic homes within the search area, but none are located in the immediate vicinity of the project site. In addition, no archaeological sites were identified within the search area. However, one historic resource was identified on the project site: Collier Park itself (and the Spring House), which was designated as a local Historic Landmark by the City of La Mesa in 1985.

During the field survey, Collier Park and the Spring House were located and additional historic elements associated with the park were identified. Evidence of precontact occupation was carefully sought during the field survey, but very little evidence was found. Two small fragments of marine shell were noted in a graded utility road on the upper east slope of the park and may indicate precontact use of the area by Native Americans. No other artifacts, ecofacts, features, or evidence of midden were encountered. It is possible that extensive grading within and around the project site has buried and/or destroyed evidence of Native American use of the springs.

Site P-37-030867, which consists of Collier Park and historic features within the park including the Spring House, has been recorded at the South Coastal Information Center. The Spring House was originally constructed by Colonel David C. Collier as a bottling works at the location of a spring and was later used for various recreational purposes, including a swimming pool, dressing room, and a meeting place for community and youth groups. The Spring House, which has been damaged by fire and vehicle collisions, is currently in a deteriorated state. Other park features include a concrete-lined drainage channel, concrete rubble bridge and stairway, embossed 1925 sewer manhole, tennis court, reconstructed drinking fountain, and trees.

As part of the Cultural Resource Survey, the NAHC was contacted to request information and/or input regarding Native American concerns either directly or indirectly associated with the proposed project. The NAHC performed a records search of its Sacred Lands File, which did not indicate the presence of numerous Native American cultural resources within the search area. In addition, written correspondence was sent and follow-up telephone calls were made to all 14 individuals on the list of Native American contacts provided by the NAHC.

5.4.2.5 Historic Evaluation

A Historic Resources Evaluation Report was prepared by ASM Affiliates, Inc. (2012) to evaluate historical and architectural significance of the Collier Park district and its contributing features. Collier Park is considered a historic district because it is a large area that contains a variety of resources (buildings, structures, landscape features, plant-life, scenic conditions) which have special historical, cultural, architectural, community, and/or aesthetic value. According to the Historic Resources Evaluation Report, the contributing features to the Collier Park district are those elements that date to the park's period of significance, including the Spring House, drinking fountain, tennis court, water feature (concrete-lined drainage channel with concrete rubble bridge and stairway) east of the Spring House, natural terrain, topography, old-growth trees, and plantings undertaken by the local community (succulents in the History Hill area). The non-contributing features are those elements that were not constructed or implemented during the park's period of significance, including the bathroom building, playground,

concrete park benches, lawn furniture, grills, water fountains, and trashcans. Although these non-contributing features do not add significance to the historic period of the Collier Park district, they are nonetheless elements that accommodate the park's continued recreational use. Architectural descriptions of the Collier Park district and the major contributing features of the built environment (Spring House, drinking fountain, and tennis court) are provided below.

Collier Park District

Collier Park consists of approximately 7.7 acres of City-owned land. It is an irregularly-shaped park with a varying topography and terrain that consists of two hillsides on the west and east sections of the park. The spatial organization of the land in Collier Park creates the recreational use of the landscape. Most of the park's recreational use is centered on the most level land within the Panhandle area of the park. The irregularly-shaped flat terrain of the Panhandle area is composed of a grass lawn with scattered old-growth trees such as eucalyptus and various types of palms. All of the existing major buildings and structures are located on this flat terrain within the Panhandle area.

A water feature element is located east of the Spring House and consists of a concrete-lined drainage channel with a concrete rubble bridge and stairway that connect the eastern portion of the park (History Hill area) to the western portion of the park (Spring House and Panhandle areas). Other small-scale landscape features that have been added to accommodate this general recreational use area include picnic benches and tables, grills, trashcans, and water fountains. Decorative elements such as large boulders and smaller stones also follow the circulation patterns and border small pathways. The circulation route of Pasadena Avenue follows the natural curves of the hillside terrain and separates the Panhandle area from the rest of the park. The circulation route of Palm Avenue is situated next to the western elevated section of the park and bordered by vegetation on the western hillside. The western hillside slopes down from Palm Avenue to the flat terrain within the Panhandle area. The vegetation on the western hillside is bordered by small wood fences that line the landscape, containing the general recreational use area to the more central portion of the park.

Little information could be found about the historic use of the northeastern portion of the park, but it remains an undeveloped hillside landscape, much like the eastern portion of the park which is elevated above the general recreational use area and does not include the same recreational furniture that adorns the landscape below. These hillside terrains have a more rugged and unfinished dirt floor with smaller trees and plantings such as succulents adorning either side of the pathways. The absence of recreational furniture and the presence of chain-link fences indicate the limited use of these hillside sections of the park.

Spring House

The Spring House was constructed in 1907 with features of the Craftsman style. It is a one-story vacant building located in the central portion of the park. It was once used as a utilitarian building for bottling. The building has a wood frame and rectangular floor plan with a stone foundation that is situated on a slope and exposed on the south elevation. The exterior is clad in stucco with half-timbering underneath the gable ends. The roof is a moderately pitched front gable roof clad in an asphalt sheet. There are also exposed rafters and knee braces. On the south elevation, a concrete walkway leads to the primary entrance which consists of a single flush wood door. There are secondary entrances located on the west and south elevations which consist of single doors that have been boarded over. There are three windows on the east elevation that have been boarded over. On the south elevation, there are also

three windows that have been boarded over. The west elevation consists of one window that has been boarded over. On the north elevation, there are no window openings. All windows have moderate casings and wood lintels. Craftsman features of the building include the overhanging eaves and exposed rafter tails and knee brackets. Other Craftsman features include the horizontal massing of the building and the half-timbering detailing underneath the gable ends. Historic photographs from 1949 show the windows were once one-over-one double hung sashes. There is a red brick chimney located on the east elevation exterior. There are no additions to the property. Modifications to the building include the boarding over of the windows and secondary entrance doors. According to a historic photograph from 1949, the south elevation roof was extended to include a pergola feature that extended over the walkway and was supported by wood posts. This is no longer extant. Landscape features include mulch and bushes along with a stone garden located adjacent to the building. Mature trees surround the building and offer shade to the surrounding landscape.

The interior of the building is in disrepair. The primary entrance on the south elevation leads to one room that spans the entire building interior. On the northwest section of the interior, there is a raised platform that is accessed by concrete steps. Surrounding the perimeter of the platform are metal poles and chain ropes. Atop the platform is a door which leads to the west elevation exterior. Underneath the platform is a small wood door that leads to an open space, possibly for storage, underneath the stage platform. On the eastern wall is the fireplace opening which lacks ornamental detail. Over the fireplace is a mantel and indented ledge that spans the entire eastern wall. Over the ledge are two boarded-over windows. Most of the interior walls have been gutted and exposed lathing can be seen. Other interior walls have a plaster covering. The interior truss system is also fully exposed. There is mold and animal waste within the interior of the building that is causing further deterioration of the structure.

Drinking Fountain

The drinking fountain was constructed in 1915 and has features of the Spanish Colonial Revival style. It is an approximately 8-foot structure located southeast of the Spring House. The fountain is a brick structure with two tapered columns adjoined in the center where the fountain is located. Underneath the fountain is a pipe system accessed by a small opening in the brick façade. The structure is covered by a side gable roof that has a wood truss system with exposed rafters and is clad in red clay tiles. The drinking fountain was previously located on Spring Street and was moved to Collier Park in 1965 as part of a conservation effort in response to a road-widening project.

Tennis Court

The existing tennis court was constructed sometime in the 1950s and has remained a tennis court to date. It is located in the southwestern portion of the park and is the standard size and shape of a contemporary tennis court. The tennis court is surrounded by a chain-link fence and has likely been repaved and repainted since its original construction. An earlier tennis court was located east of the existing tennis court, and there was a pool located where the existing tennis court currently stands. The pool was demolished sometime in the late 1940s and the existing tennis court was constructed in its place in the 1950s.

5.4.2.6 NRHP and CRHR Eligibility

Based on the evaluation of the historical and architectural significance of its contributing features in the Historical Resources Evaluation Report (ASM Affiliates 2012), the Collier Park district is recommended

eligible for listing in the NRHP and the CRHR under Criterion A/1 and Criterion B/2 for the reasons discussed below.

Criterion A/1: Is associated with events that have made a significant contribution to the broad patterns of history.

The Collier Park district is recommended eligible for listing in the NRHP and the CRHR under Criterion A/1 at the local level under the themes of community planning/development and conservation. The park's period of significance begins in 1907 with the construction of the Spring House and extends to 1965 when conservation efforts culminated with the relocation of the drinking fountain. Collier Park was the first recreational park established in La Mesa, and remains the oldest park in the City today. The northwestern portion of the park (donated by Colonel David C. Collier) dates back to 1910, while the remaining acreage was acquired by the City in 1915 and was fully developed by the early 1920s with recreational amenities, such as open space, a playground, picnic areas, a pool, and tennis courts. Some of these original features have since been altered or replaced.

Collier Park also experienced the beautification and conservation efforts that were part of a nationwide movement in the mid-twentieth century, in this case by a group of local women who restored and improved its setting to ensure the park would continue to be utilized. In the early 1950s, the current tennis court was added to replace the demolition area of the previous pool. Conservation efforts extended to 1965 when the drinking fountain, endangered by the road-widening along Spring Street, was relocated to the park from its previous location. These conservation efforts are evident in the collection of buildings, structures, and objects, as well as landscape features, which contribute to the park's eligibility and integrity. Some landscape features from this time period remain, such as the succulent plantings on the eastern hillside.

Criterion B/2: Is associated with the lives of persons important in our past.

The Collier Park district is also recommended eligible for listing in the NRHP and the CRHR under Criterion B/2 at the local level for its association with Colonel David C. Collier, one of the pioneers of San Diego County and an important figure in the history of La Mesa. Collier was a prominent lawyer and developer during the late nineteenth and early twentieth century, and was responsible for the development of several neighborhood tracts in San Diego County. In 1910, Collier donated the land, including the Spring House, that was soon after developed into Collier Park, a recreational park in his namesake.

5.4.2.7 Paleontological Resources

The San Diego Natural History Museum Department of Paleontology has assigned resource sensitivity ratings to geologic formations in the San Diego region based on their potential for yielding paleontological resources (Demere and Walsh 2003). The levels of paleontological resource sensitivity are defined as follows:

- **High Sensitivity.** High sensitivity is assigned to geologic formations known to contain paleontological localities with rare, well-preserved, and/or critical fossil materials for stratigraphic or paleoenvironmental interpretation, and fossils providing important information

about the paleobiology and evolutionary history (phylogeny) of animal and plant groups. Generally speaking, highly sensitive formations are known to produce vertebrate fossil remains or are considered to have the potential to produce such remains.

- **Moderate Sensitivity.** Moderate sensitivity is assigned to geologic formations known to contain paleontological localities with moderately preserved, common elsewhere, or stratigraphically long-ranging fossil material. The moderate sensitivity category is also applied to geologic formations that are judged to have a strong, but unproven potential for producing important fossil remains (e.g., Pre-Holocene sedimentary rock units representing low to moderate energy, marine to non-marine depositional settings).
- **Low Sensitivity.** Low sensitivity is assigned to geologic formations that, based on their relative youthful age and/or high-energy depositional history, are judged unlikely to produce important fossil remains. Typically, low sensitivity formations may produce invertebrate fossil remains in low abundance.
- **Marginal Sensitivity.** Marginal sensitivity is assigned to geologic formations that are composed either of pyroclastic volcanic rocks or metasedimentary rocks, but which nevertheless have a limited probability for producing fossil remains from certain sedimentary lithologies at localized outcrops.
- **Zero Sensitivity.** Zero sensitivity is assigned to geologic formations that are entirely plutonic in origin and therefore have no potential for producing fossil remains.

Collier Park is underlain by metasedimentary and metavolcanic rock associated with the Santiago Peak Volcanics formation, which is assigned a marginal paleontological resources sensitivity.

5.4.3 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a significant impact to cultural resources would occur if implementation of the proposed project would:

- **Threshold 1:** Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.
- **Threshold 2:** Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.
- **Threshold 3:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- **Threshold 4:** Disturb any human remains, including those interred outside of formal cemeteries.

5.4.4 Impacts

5.4.4.1 Historical Resources

Threshold 1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?

As discussed in Section 5.4.1.2 above, Section 15064.5 of the CEQA Guidelines provides guidance on determining the significance of impacts to archaeological and historical resources. The term “historical resources” is defined to include the following:

- 1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR.
- 2) A resource included in a local register of historical resources (as defined in California Public Resources Code Section 5020.1(k)) or identified as significant in a historical resource survey (meeting the requirements of California Public Resources Code Section 5024.1(g)), unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- 3) Any object, building, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant to the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.
- 4) The fact that a resource does not meet one of the above-listed criteria does not preclude a lead agency from determining that the resource may be a historical resource.

As stated in Section 5.4.2.5 above, Collier Park is considered a historic district because it is a large area that contains a variety of resources (buildings, structures, landscape features, plant-life, scenic conditions) which have special historical, cultural, architectural, community, and/or aesthetic value. Based on the evaluation of the historical and architectural significance of its contributing features in the Historical Resources Evaluation Report (ASM Affiliates 2012), the Collier Park district is recommended as being eligible for listing in the NRHP and the CRHR under Criterion A/1 and Criterion B/2. The Collier Park district is recommended eligible for listing in the NRHP and the CRHR under Criterion A/1 at the local level under the themes of community planning/development and conservation. The Collier Park district is also recommended eligible for listing in the NRHP and the CRHR under Criterion B/2 at the local level for its association with Colonel David C. Collier, one of the pioneers of San Diego County and an important figure in the history of La Mesa.

Listing on the NRHP assists in preservation of federally recognized historic properties through the following actions: formal recognition a property’s historical, architectural, or archaeological significance; consideration in planning for federal, federally licensed, or federally assisted projects; eligibility for federal tax benefits; consideration of historic values in the decision to issue a surface mining permit; and qualification for federal grants for historic preservation, when funds are available. Listing on the CRHR allows for the identification, evaluation, registration and protection of California’s historical and archaeological resources. The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for state historic preservation grant funding and affords certain protections under CEQA. In addition, as stated in Section 5.4.1.3 above, Collier Park and the Spring House are included in the La Mesa Historic Resources Inventory and have been designated on

the Historic Landmark Register. Thus, due to its eligibility to the NRHP, CRHR and La Mesa Historic Resources Inventory, the Collier Park District represents a historical resource as defined in CEQA Guidelines Section 15064.5.

According to the Historic Resources Evaluation Report (ASM Affiliates, Inc. 2012), the proposed project would result in a substantial adverse change in the significance of the Collier Park district as a historical resource. As defined in CEQA Guidelines Section 15064.5, 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 the historical resource would be materially impaired. The significance of an historical resource is materially impaired when a project demolishes or alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR, or that account for its inclusion in a local register of historical resources. As stated in Section 5.4.2.5 above, the contributing features to the Collier Park district are those elements that date to the park's period of significance, including the Spring House, drinking fountain, tennis court, water feature (concrete-lined drainage channel with concrete rubble bridge and stairway) east of the Spring House, natural terrain, topography, old-growth trees, and plantings undertaken by the local community (succulents in the History Hill area). Thus, these contributing features are considered those physical characteristics of the Collier Park district that convey its historical significance.

The proposed project includes development of undeveloped open space within the park (History Hill and Collier Club House areas), which would require the alteration of the natural terrain and the removal of old-growth trees and vegetation. The development of existing open space into an amphitheater and club house would transform the overall historic use and design of the landscape, which are important contributing features of the park. Furthermore, the proposed project includes the partial demolition and reconstruction of the Spring House for adaptive reuse as an outdoor interpretive center; partial demolition of the drinking fountain and reconstruction at a new location (entrance of the park); complete demolition of the tennis court and replacement with a new tennis court; and complete demolition of the water feature east of the Spring House and replacement with a bioswale and biofiltration basin. The partial or complete demolition of these contributing features would result in the material impairment of the Collier Park Historic district in such a way that it would no longer convey its historical significance or justify its eligibility for inclusion in the NRHP or the CRHR. Thus, the cumulative loss of contributing features would cause a substantial adverse change in the significance of the Collier Park district as a historical resource. Therefore, implementation of the proposed project would result in a potentially significant impact associated with historical resources.

5.4.4.2 Archaeological Resources

Threshold 2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

As stated in Section 5.4.3.3 above, a Cultural Resource Survey was conducted for the search area encompassing Collier Park and a one-half mile radius around the park (Noah Archaeological Consulting 2009). No archaeological sites were identified within the search area. In addition, the NAHC performed a records search of its Sacred Lands File, which did not indicate the presence of numerous Native American cultural resources within the search area. Thus, archaeological or Native American resources are not known to occur within the project area. However, portions of the park, such as the History Hill

and Collier Club House areas, are largely undeveloped and may contain unknown archaeological or Native American resources. It is possible that ground-disturbing activities associated with construction of the proposed project may uncover presently obscured or buried unknown archaeological or Native American resources. In the event that subsurface archaeological or Native American resources are encountered during construction, such resources could potentially be damaged or destroyed, resulting in a significant adverse impact. Therefore, implementation the proposed project would result in a potentially significant impact associated with archaeological and Native American resources.

5.4.4.3 Paleontological Resources

Threshold 3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

As stated in Section 5.4.2.7 above, the project site is underlain by metasedimentary and metavolcanic rock associated with the Santiago Peak Volcanics formation, which is assigned a marginal paleontological resources sensitivity. Although it is considered very unlikely for this geologic formation to contain paleontological resources, there is still a limited probability for producing fossil remains from certain sedimentary lithologies at localized outcrops. As such, there is a marginal possibility that ground-disturbing activities associated with construction of the proposed project may uncover paleontological resources. In the event that paleontological resources are encountered during construction, such resources could potentially be damaged or destroyed. Therefore, implementation of the proposed project would result in a potentially significant impact associated with paleontological resources.

5.4.4.4 Human Remains

Threshold 4: Would the project disturb any human remains, including those interred outside of formal cemeteries.

As stated in Section 5.4.2.4 above, a records search of the Sacred Lands File did not indicate the presence of numerous Native American cultural resources within the search area. Thus, it is unlikely that known human remains would be affected by the proposed project. However, there is always a possibility that ground-disturbing activities associated with construction of the proposed project may uncover presently obscured or buried unknown human remains. If human remains are encountered during construction, the County Coroner would be notified immediately and the find would be handled in accordance with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.

In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, California Health and Safety Code Section 7050.5(b) requires that there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the County Coroner has determined the circumstances, manner, and cause of death, and has provided recommendations concerning the treatment and disposition of the human remains. If the human remains are recognized or believed to be those of a Native American, California Health and Safety Code Section 7050.5(c) requires the County Coroner to contact the NAHC by telephone within 24 hours. Pursuant to California Public Resources Code Section 5097.98, the NAHC shall immediately notify those persons it believes to be most likely descendants of the Native American human remains. With permissions from the landowner, the most likely descendants may inspect the site of discovery and

make recommendations for the treatment and disposition of the Native American human remains and any associated grave goods within 48 hours of their notification by the NAHC. The landowner shall discuss and confer with the most likely descendants all reasonable options regarding the descendants' preferences for treatment, which may include the following:

- a) Nondestructive removal and analysis of the Native American human remains and associated items.
- b) Preservation of the Native American human remains and associated items.
- c) Relinquishment of the Native American human remains and associated items to the descendants for treatment.
- d) Other culturally appropriate treatment.

Compliance with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98 in the unlikely event that human remains are encountered during construction would prevent significant impacts. Therefore, impacts associated with human remains would be less than significant.

5.4.5 Mitigation Measures

5.4.5.1 Historical Resources

A significant impact related to historical resources (specifically, the Collier Park district, including the Spring House and other contributing features) would result from implementation of the proposed project. Implementation of the following mitigation measures, in addition to the adaptive reuse of the Spring House as an outdoor interpretive center, would reduce this impact to below a level of significance.

CUL-1 Historic American Landscape Survey. Historic American Landscape Survey (HALS) Level II documentation of the Collier Park district (including the Spring House and other contributing features) shall occur prior to the start of construction activities for any phase of the proposed project. The HALS Level II documentation shall be prepared by a registered landscape historian in accordance with the Secretary of Interior's Standards and Guidelines for Architectural and Engineering Documentation and the National Park Service's HALS Guidelines. In conformity with the HALS Level II standards, the documentation package shall include the following three elements: 1) a narrative historical report; 2) large-format photographic documentation; and 3) reproduction of select existing drawings.

CUL-2 Preservation Measures. The City shall implement all of the following preservation measures:

- 1) Retention of the undamaged portions of the original roof frame and tiles in the reconstruction of the drinking fountain.
- 2) Retention of natural landscape features, such as the natural terrain, topography, old-growth trees, and plantings undertaken by the local community (including succulents in the History Hill area), and incorporation thereof into the project design.

- 3) Placement of interpretive signage throughout the park that conveys a brief history of Collier Park, role in the development of the City of La Mesa, and historical significance. At a minimum, signs shall be placed at the Spring House, current and new locations of the drinking fountain, tennis court, water feature east of the Spring House, and in the general locale of the Panhandle and History Hill areas. Interpretive signage shall include historic photographs of the Collier Park district. Signs that include historic photographs shall be placed at a vantage point that provides direct observation of the view depicted.
- 4) Conduct oral history interviews with individuals identified in concert with the La Mesa Historical Society that have an association with Collier Park, such as descendants of Colonel David C. Collier and members of the Spring House Garden Club.
- 5) Financial contribution in support of a related preservation or restoration project in the City of La Mesa.

5.4.5.2 Archaeological Resources

A potentially significant impact related to archaeological resources would result from implementation of the proposed project. Implementation of the following mitigation measure would reduce this impact to below a level of significance.

- CUL-3** Archaeological and Native American Monitoring. An archaeological monitor and a Native American monitor shall be present during all ground-disturbing activities in previously undisturbed soils. If an artifact is encountered, all operations in the area where the artifact was found shall be suspended immediately, the City shall be notified, and a qualified archaeologist and/or Native American monitor shall be retained by the City to evaluate the significance of the find; to salvage, record, clean, and curate significant artifact(s); and to document the find in accordance with current professional archaeological standards. Within 30 days of completion of ground-disturbing activities, either a letter signed by the archaeological and Native American monitors stating that no artifacts were found or, if artifacts were found, a report prepared by the qualified archaeologist and Native American monitor documenting the mitigation program shall be submitted to the City.

5.4.5.3 Paleontological Resources

A potentially significant impact related to paleontological resources would result from implementation of the proposed project. Implementation of the following mitigation measure would reduce this impact to below a level of significance.

- CUL-4** Paleontological Monitoring. A paleontological monitor shall be present during all initial cutting, grading, or excavation of previously undisturbed substratum. If a fossil of greater than 12 inches in any dimension (including circumference) is encountered, all operations in the area where the fossil was found shall be suspended immediately, the City shall be notified, and a qualified paleontologist shall be retained by the City to evaluate the significance of the find; to salvage, record, clean, and curate significant fossil(s); and to document the find in accordance with current professional paleontological standards. Within 30 days of completion of ground-disturbing activities, either a letter signed by the paleontological monitor stating that no fossils were found or, if fossils were found, a report

prepared by the qualified paleontologist documenting the mitigation program shall be submitted to the City.

5.4.5.4 Human Remains

No significant impacts related to human remains would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

5.4.6 Significance Determination

The significance of cultural resources impacts before and after mitigation is summarized in Table 5.4-1. Implementation of the proposed project would not result in any significant impacts related to human remains; however, potentially significant impacts related to historical resources, archaeological resources, and paleontological resources would occur prior to mitigation. With implementation of mitigation measures CUL-1 through CUL-4, these impacts would be reduced to below a level of significance. Therefore, impacts associated with cultural resources would be less than significant after mitigation.

Table 5.4-1 Summary of Significance of Cultural Resources Impacts

Issue	Significance before Mitigation	Mitigation	Significance after Mitigation
Historical Resources	Significant	CUL-1 and CUL-2	Less than Significant
Archaeological Resources	Significant	CUL-3	Less than Significant
Paleontological Resources	Significant	CUL-4	Less than Significant
Human Remains	Less than Significant	None	Less than Significant

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