

Part III

**COMMENTS RECEIVED ON THE DRAFT EIR
AND RESPONSES**

Part III

COMMENTS RECEIVED ON THE DRAFT EIR AND RESPONSES

All written comments received on the Draft EIR have been coded to facilitate identification and tracking. Each of the comment letters, forms, and emails received during the public comment period was assigned an identification number (Table RTC-1). These documents were reviewed and divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers. Each numbered comment document is the submittal of a single individual, agency, or organization. The comment number consists of two parts. The first part is the number of the document and the second is the number of the comment. Thus, Comment S2-1 refers to the first comment (comment #1) of Comment Letter S2. To aid the readers and commentors, comments have been reproduced in this document together with corresponding responses on the same page. All written comments received on the Recirculated Draft EIR sections are coded with the letter "R." Please see Chapter 2, Introduction, for additional information on the public review period for the Recirculated Draft EIR.

Table RTC-1 Comments Received on Draft EIR

No.	Commenter	Date
Federal Agencies		
F1	Michelle Simmons, Environmental Officer, U.S. Department of Housing and Urban Development	March 12, 2013
State Agencies		
S1	Scott Morgan, Director, California State Clearinghouse and Planning Unit	March 12, 2013
S2	Dave Singleton, Program Analyst, Native American Heritage Commission	January 29, 2013
Local Agencies		
L1	John Schmitz, Chair, La Mesa Historic Preservation Commission	March 8, 2013

No.	Commentor	Date
Organizations and Individuals		
O1	Nina Babiarz, La Mesa Resident and La Mesa Historical Society Member	No date
O2	Susan Brandt-Hawley, Brandt-Hawley Law Group	March 11, 2013
O3	Linda A. Canada	March 8, 2013
O4	Gregory A. Childs	March 5, 2013
O5	Ruth Contino	March 8, 2013
O6	Kathleen A. Crawford, M.A., Crawford Historic Services	March 9, 2013
O7	Laurise and John Gerk	March 4, 2013
O8	Joe Glidden	March 9, 2013
O9	P. David Marshall, AIA, La Mesa Resident, Heritage Architecture and Planning	March 7, 2013
O10	Aaron Landau, President, La Mesa Historical Society	March 9, 2013
O11	Helen M. Ofield, President, Lemon Grove Historical Society	February 14, 2013
O12	Dexter Levy	March 4, 2013
O13	Alfred J. Mazur, AIA	March 7, 2013
O14	Dr. Anthony D. McIvor	March 1, 2013
O15	Jerelyn A. Morgan	March 9, 2013
O16	Dan Soderberg, Chair, Neighborhood Historic Preservation Coalition	February 5, 2013
O17	James D. Newland, M.A.	March 11, 2013
O18	Ken and Donna Niemeier	March 7, 2013
O19	Patricia I. O'Reilly	March 3, 2013
O20	Bruce Coons, Executive Director, Save Our Heritage Organisation	March 7, 2013
O21	Donald Taylor	No date
O22	Gregory May	March 7, 2013
O23	Charles and Julie Bras	March 11, 2013
O24	James D. Newland, Vice President, La Mesa Historical Society	March 4, 2013
Revised Draft EIR Comment Letters		
R1	Scott Morgan, Director, California State Clearinghouse and Planning Unit	January 6, 2015
R2	Theresa Bradford, Chief, Department of the Army, Los Angeles District	December 15, 2014
R3	James Newland, President, La Mesa Historical Society	January 5, 2015
R4	Bruce Coons, Executive Director, Save Our Heritage Organisation	January 2, 2015
R5	Laurise and John Gerk	January 4, 2015
R6	Patricia I. O'Reilly	January 5, 2015

COMMENTS

From: Simmons, Michelle
Sent: Tuesday, March 12, 2013 11:08 AM
To: Huseby, Nelson D
Cc: Molins, Ernest; Simmons, Michelle
Subject: City of La Mesa Draft EIR for Collier Park Renovations Project Subject to NEPA Due to Additional HUD Funding

Good Morning Dean,

F1-1.

I have reviewed the draft Environmental Impact Report (EIR) for the Collier Park Renovations Project prepared by the City of La Mesa. The EIR is required due to the state funding sources and in compliance with the California Environmental Quality Act (CEQA). Pursuant to the potential impacts of the project, the City is required to consult with affected agencies through the public process attendant to the preparation of the EIR. The Collier Park Renovations project received CDBG funding for the initial planning studies, and is subject to receive additional HUD funds. Federal funds may not be committed to the project until the NEPA process is completed. The CEQA EIR does not waive the requirement for a NEPA document. However the EIR can be used in the preparation of a separate stand-alone Environmental Assessment (EA) in compliance with HUD's NEPA requirements.

Feel free to contact me if you need further assistance.

Michelle Simmons
 Environmental Officer
 U.S. Department of Housing and Urban Development
 Region IX
 611 West Sixth Street, Suite 808
 Los Angeles, CA 90017
 Tel (213) 534-2772
 Fax (213) 894-8113

Jurisdiction: Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Imperial Counties.

Michelle.Simmons@hud.gov

<http://www.hud.gov/offices/cpd/environment/index.cfm>

RESPONSES

Letter F1: U.S Department of Housing and Urban Development

F-1 This comment states that the Draft EIR was prepared to comply with the requirements of the California Environmental Quality Act (CEQA); however, a National Environmental Policy Act (NEPA) document is also required because the project received federal Community Development Block Grant funding and may receive additional funding from the Department of Housing and Urban Development (HUD). The City is aware the requirement to prepare a NEPA document for the project; however, it will be a separate stand-alone document. The City is currently preparing an Environmental Assessment (EA) in compliance with HUD's NEPA requirements.

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STATE OF CALIFORNIA
 Governor's Office of Planning and Research
 State Clearinghouse and Planning Unit



Ken Alex
 Director

Letter S1: State Clearinghouse

Edmund G. Brown Jr.
 Governor

March 12, 2013

Chris Jacobs
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

Subject: Collier Park Renovations Project
 SCH#: 2011101051

Dear Chris Jacobs:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 11, 2013, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
 Director, State Clearinghouse

S1-1 This comment letter states that the City of La Mesa has complied with the State Clearinghouse requirements for the review of draft environmental documents under the California Environmental Quality Act (CEQA). One comment letter was received from the State agencies: the Native American Heritage Commission (letter S2).

S1-1.

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**Document Details Report
State Clearinghouse Data Base**

SCH# 2011101051
Project Title Collier Park Renovations Project
Lead Agency La Mesa, City of

Type EIR Draft EIR
Description The proposed project is organized into four areas: 1) Panhandle; 2) Spring House; 3) History Hill; and 4) Collier Club House. The improvements proposed are conceptual in nature, and detailed plans have not been finalized, except for the Panhandle area of the park. The EIR analysis will evaluate a worst-case scenario with respect to the impacts associated with the construction and operation of the proposed project.

Lead Agency Contact

Name Chris Jacobs
Agency City of La Mesa
Phone (619) 667-1188 **Fax**
email
Address 8130 Allison Avenue
City La Mesa **State** CA **Zip** 91942

Project Location

County San Diego
City La Mesa
Region
Lat / Long 32° 45' 33" N / 117° 0' 53" W
Cross Streets Palm Avenue at Pasadena Avenue
Parcel No. 494-642-01, 02, 03, 494-651-01
Township 16S **Range** 1W **Section** 19/30 **Base**

Proximity to:

Highways SR 94, SR 125, I-8
Airports No
Railways SD&AZ RR / MTS
Waterways Lake Murray Reservoir, Alvarado Creek
Schools Various
Land Use Office complex to the south, single family homes to the east and west, and an apartment complex to the north.
 Z: Suburban Residential with the Scenic Preservation Overlay Zone (R1S-P)
 GPD: Neighborhood Park Recreation Use

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Geologic/Seismic; Noise; Soil Erosion/Compaction/Grading; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 01/24/2013 **Start of Review** 01/24/2013 **End of Review** 03/11/2013

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Letter S2: Native American Heritage Commission

STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



January 29, 2013

Chris Jacobs, AICP, Senior Planner
City of La Mesa
8130 Allison Avenue
La Mesa, CA 91942

RE: SCH# 2011101051 – Collier Park Renovations Project # CR-09-04 – San Diego County

Dear Chris Jacobs:

- S2-1. The Native American Heritage Commission has reviewed the Notice of Preparation (NOP) regarding the above referenced project. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:
- S2-2. Contact the appropriate Information Center for a record search to determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- S2-3. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- S2-4. Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check.
 - A list of appropriate Native American Contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contact List Attached**
- S2-5. Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- S2-6.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
- S2-7.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.
- S2-8.

- S2-1 This comment does not pertain the adequacy or accuracy of information provided in the Draft EIR. The comment cites a CEQA guideline regarding cultural resources and introduces the commenter’s recommendations, which are addressed in responses to comments S2-2 through S2-8.
- S2-2 This comment suggests that the City contact the appropriate information center to obtain cultural resources information for the project site. As stated on page 5.4-11 of the Draft EIR, a Cultural Resource Survey was conducted for the area encompassing Collier Park and a one-half mile radius around the park (Noah Archaeological Consulting 2009). A records search was performed at the South Coastal Information Center, which identified 47 historic homes within the search area, none of which are located in the immediate vicinity of the project site. No archaeological resources were identified in the immediate vicinity of the project site. The Cultural Resources Survey is included as Appendix D to the EIR. Therefore, this recommendation has already been incorporated into the EIR.
- S2-3 This comment recommends that, if an archaeological inventory survey is required, a professional report be prepared, and provide specific guidance for preparation of the report. As described in response to comment S2-2, the South Coastal Information Center search did not identify any archaeological resources in the immediate vicinity of the project site. Therefore, an archeological inventory survey was not required for the proposed project, and the commenter’s recommendations do not apply.
- S2-4 This comment requests the City contact the Native American Heritage Commission (NAHC) for a Sacred Lands File Check and a list of Native American contacts. As stated on page 5.4-11 of the Draft EIR, as part of the Cultural Resource Survey prepared by Noah Archaeological Consulting (2009), the NAHC was contacted. The NAHC performed a records search

Sincerely,

Dave Singleton
Program Analyst
(916) 653-6251

CC: State Clearinghouse

COMMENTS

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**Native American Contacts
San Diego County
January 28, 2013**

Barona Group of the Capitan Grande
Edwin Romero, Chairperson
1095 Barona Road Diegueno
Lakeside , CA 92040
sue@barona-nsn.gov
(619) 443-6612
619-443-0681

Sycuan Band of the Kumeyaay Nation
Daniel Tucker, Chairperson
5459 Sycuan Road Diegueno/Kumeyaay
El Cajon , CA 92019
ssilva@sycuan-nsn.gov
619 445-2613
619 445-1927 Fax

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
PO Box 1120 Diegueno/Kumeyaay
Boulevard , CA 91905
gparada@lapostacasino.
(619) 478-2113
619-478-2125

Viejas Band of Kumeyaay Indians
Anthony R. Pico, Chairperson
PO Box 908 Diegueno/Kumeyaay
Alpine , CA 91903
jrothau@viejas-nsn.gov
(619) 445-3810
(619) 445-5337 Fax

Manzanita Band of Kumeyaay Nation
Leroy J. Elliott, Chairperson
PO Box 1302 Diegueno/Kumeyaay
Boulevard , CA 91905
ljbirdsinger@aol.com
(619) 766-4930
(619) 766-4957 Fax

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine , CA 92001
(619) 445-0385

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 365 Diegueno
Valley Center, CA 92082
allenl@sanpasqualband.com
(760) 749-3200
(760) 749-3876 Fax

Campo Band of Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo , CA 91906
chairgoff@aol.com
(619) 478-9046
(619) 478-5818 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011101051; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Collier Park Renovations Project; located in the City of La Mesa; San Diego County, California.

of its Sacred Lands File, which did not indicate the presence of Native American cultural resources within the project site. 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. Therefore, this recommendation has already been incorporated into the EIR.

S2-5 This comment states that lack of surface evidence of archaeological resources does not preclude their subsurface existence. The EIR concurs with this statement. As discussed in Section 5.4.4.2 of the Draft EIR, Archaeological Resources, archaeological or Native American resources are not known to occur within the project area. However, portions of the park 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. Therefore, the Draft EIR determined that implementation the proposed project would result in a potentially significant impact associated with archaeological and Native American resources. Mitigation measure Cul-1 identified in the Draft EIR requires archaeological and Native American monitoring during ground disturbing activities in previously undisturbed soils. Implementation of this measure would reduce impacts to a less than significant level. Therefore, this recommendation has already been incorporated into the EIR.

S2-6 This comment states that the mitigation for the project should include provisions for accidentally discovered archeological resources, and ground-disturbing activities in sensitive archeological areas should be monitored. As discussed in response to comment S2-5, the Draft EIR determined that implementation the proposed project would result in a potentially significant impact associated with archaeological and Native American resources. Mitigation measure Cul-3 in the Draft EIR includes provisions for the identification and evaluation of accidentally discovered archaeological resources, and includes a requirement for a Native American monitor during all ground-disturbing activities in previously undisturbed soils. Therefore, this recommendation has already been incorporated into the EIR.

S2-7 This comment states that the EIR should include the provision for the disposition of recovered artifacts in consultation with culturally affiliated Native Americans. As discussed in response to comment S2-6, mitigation measure Cul-3 addresses accidentally discovered archeological resources, including Native American resources. Mitigation measure Cul-3 requires that, if an artifact is encountered, a qualified archaeologist and/or Native American monitor shall be retained by the City to evaluate the significance of the find;

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**Native American Contacts
San Diego County
January 28, 2013**

Jamul Indian Village
Raymond Hunter, Chairperson
P.O. Box 612 Diegueno/Kumeyaay
Jamul, CA 91935
jamulrez@sctdv.net
(619) 669-4785
(619) 669-48178 - Fax

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside, CA 92040
sbenegas50@gmail.com
(619) 742-5587
(619) 443-0681 FAX

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O. Box 270 Diegueno
Santa Ysabel, CA 92070
mesagrandeband@msn.com
(760) 782-3818
(760) 782-9092 Fax

Ewiiapaay Tribal Office
Will Micklin, Executive Director
4054 Willows Road Diegueno/Kumeyaay
Alpine, CA 91901
wmicklin@leaningrock.net
(619) 445-6315 - voice
(619) 445-9126 - fax

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas
P.O. Box 775 Diegueno -
Pine Valley, CA 91962
(619) 709-4207

Ipay Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
P.O. Box 507 Diegueno/Kumeyaay
Santa Ysabel, CA 92070
cjlinton73@aol.com
(760) 803-5694
cjlinton73@aol.com

Inaja Band of Mission Indians
Rebecca Osuna, Chairman
2005 S. Escondido Blvd. Diegueno
Escondido, CA 92025
(760) 737-7628
(760) 747-8568 Fax

Kumeyaay Diegueno Land Conservancy
Mr. Kim Bactad, Executive Director
2 Kwaaypaay Court Diegueno/Kumeyaay
El Cajon, CA 91919
guassacl@onebox.com
(619) 445-0238 - FAX
(619) 659-1008 - Office
kimbactad@gmail.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011101051; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Collier Park Renovations Project; located in the City of La Mesa; San Diego County, California.

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, 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. Mitigation measure Cul-3 includes provision for disposition of recovered artifacts in consultation with culturally affiliated Native Americans. Therefore, this recommendation has already been incorporated into the EIR.

S2-8

This comment states that the EIR should include provisions for the discussion of Native American human remains in accordance with California Health and Safety Code Section 7050.5(c), CEQA, and Public Resources Code Section 5097.98. The 2009 Cultural Resource Survey prepared by Noah Archaeological Consulting (Appendix D to the Draft EIR) addressed the likelihood of implementation of the proposed project to uncover human remains through a records search of the NAHC Sacred Lands File. As discussed in Section 5.4.4.4 of the Draft EIR, the records search did not indicate the presence of Native American cultural resources within the project site. Thus, it is unlikely that known human remains would be affected by the proposed project. However, as stated in Section 5.4.4.4 of the Draft EIR, in the unlikely event that human remains are discovered, the project would comply with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98. Therefore, this recommendation has already been incorporated into the EIR.

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**Native American Contacts
San Diego County
January 28, 2013**

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator
240 Brown Road Diegueno/Kumeyaay
Alpine, CA 91901
frankbrown6928@gmail.com
(619) 884-6437

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside, CA 92040
(619) 478-2113
(KCRC is a Colation of 12
Kumeyaay Governments

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011101051; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Collier Park Renovations Project; located in the City of La Mesa; San Diego County, California.

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Letter L1: City of La Mesa Historic Preservation Commission



COMMUNITY DEVELOPMENT DEPARTMENT

March 8, 2013

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

Re: Collier Park Renovations Project EIR

Dear Mr. Jacobs:

L1-1. I am writing on behalf of the La Mesa Historic Preservation Commission (HPC), which reviewed the Collier Park Renovations Project EIR at regularly scheduled meetings on February 5, 2013 and March 5, 2013. At those meetings, the Commission discussed the proposal to partially demolish the Spring House, a locally registered historic landmark, and replace it with an outdoor interpretative center as described in the EIR project description.

Collier Park and the Spring House possess unique historical significance to the community. The City of La Mesa has long maintained a strong and successful historic preservation program and should continue that tradition by setting an example of stewardship for cultural resources.

L1-2. To date, the existing structural condition of the Spring House has not been adequately evaluated. The HPC was unanimous in its belief that a historic structure report should have been prepared to determine the feasibility of restoration or rehabilitation of the Spring House and should have been considered during preparation of the EIR. The historic structure report is a recognized optimal first phase of historic preservation efforts, preceding design and implementation of preservation, rehabilitation, restoration, or reconstruction work.

In light of these facts, the HPC took action on March 5, 2013 to comment on the EIR as follows:

L1-3. 1. Instead of adopting the proposed project as described in the EIR, which specifically includes partial demolition of the Spring House and its reconstruction as an interpretative site, the City Council is strongly encouraged to adopt Spring House Restoration as the most preferred alternative, or Spring House Rehabilitation as the second most preferred alternative. Improvements to the Collier Clubhouse area are acceptable in either of these scenarios. Contributing features consisting of the drainage channel, stone bridge, drinking fountain, and historic old growth trees should also be preserved.

L1-4. 2. A historic structure report should be prepared prior to any further action being taken on the EIR by the City.

Thank you, on behalf of the HPC, for the opportunity to comment on the draft Collier Park Renovations Project EIR.

Sincerely,

John Schmitz
 Chair, La Mesa Historic Preservation Commission

L1-1 This comment introduces the commenter and provides information about the history of the project and information from the Draft EIR project description. It does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.

L1-2 This comment states that Collier Park and the Spring House possess historical significance, and that the City of La Mesa should continue its history of preservation of cultural resources. The Draft EIR acknowledges the historical significance of Collier Park as a historic district, and the Spring House as a contributing feature to the historic district in Section 5.4, Cultural Resources. The Draft EIR determined in Section 5.4.4.1, Historical Resources, that implementation of the proposed project would result in the material impairment of the Collier Park Historic District such that it would no longer convey its historical significance or justify its eligibility for inclusion in the NRHP or the CRHR. Therefore, implementation of the proposed project would result in a potentially significant impact associated with historical resources and mitigation measures Cul-1 and Cul-2 are proposed to reduce impacts to a less than significant level.

The Draft EIR includes two project alternatives in Chapter 8.0, Alternatives, which would not result in demolition of the Spring House or other contributing features within Collier Park: the Spring House Rehabilitation Alternative, and the Spring House Restoration Alternative. In addition, the Draft EIR has been revised to include an additional alternative that combines the proposed project with the No Project Alternative and Spring House Rehabilitation Alternative. Under this alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the

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building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. Mothballing is the process of closing and protecting a building from weather and vandalism¹. This alternative is described in detail and compared to the proposed project in Section 8.2.5 of the Final EIR, Spring House Deterioration Prevention Alternative. This alternative would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure, which was the focus of public comments received during the EIR 45-day public review period.

The addition of a new, hybrid alternative does not present significant new information that would trigger recirculation of the Draft EIR. As identified in Section 15088.5 of the CEQA Guidelines, recirculation is only required if the following are identified: new significant environmental impacts; an increase in the severity of project impacts; or new feasible alternatives or mitigation measures that are considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project. The Spring House Deterioration Prevention Alternative combines elements of the proposed project, No Project Alternative, and Spring House Rehabilitation Alternative. Mothballing would not result in any new environmental impacts that were not addressed in the Draft EIR, or lessen environmental impacts compared to previously identified alternatives. Therefore, the Spring House Deterioration Prevention Alternative is not considerably different from previously analyzed alternatives and recirculation of the Draft EIR is not required.

The City Council will consider the proposed project and all proposed alternatives when making a decision on the project. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the Spring House Deterioration Prevention Alternative. Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure.

¹ Park, Sharon C., AIA. 1993. U.S Department of the Interior, National Park Service, Technical Preservation Services. Preservation Briefs #31 – Mothballing Historic Buildings. September.

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This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure.

- L1-3** This comment states that the structural condition of the Spring House has not been adequately evaluated because a historic structures report (HSR) was not prepared in support of the Draft EIR. An HSR provides documentary, graphic, and physical information about a property's history and existing condition. It also addresses management or owner goals for the use or re-use of the property, including selection of the most appropriate approach to treatment, prior to the commencement of work, and outlines a scope of recommended work. The report serves as an important guide for all changes made to a historic property during a project-repair, rehabilitation, or restoration and can also provide information for maintenance procedures. Finally, it records the findings of research and investigation, as well as the processes of physical work, for future researchers². Preparation of an HSR is most appropriate as a preliminary step in a preservation project; it does not include all of the elements necessary to provide an adequate analysis of potential impacts required for a CEQA analysis. An HSR may be prepared at a later date, prior to commencement of work on the Spring House, but is not the document most appropriate for preparation of a Draft EIR.

For the purposes of the EIR analysis, ASM Affiliates, Inc. prepared a Historic Resources Evaluation Report for the proposed project. It is included as Appendix E to the Draft EIR. This report evaluated the historical significance of the entire project site (including the Spring House), determined the potential impacts of the proposed project on the historical significance of the project site, and proposed mitigation measures to reduce impacts to a less than significant level. Therefore, the Historic Resources Evaluation Report was the appropriate and adequate document to prepare in support of the Draft EIR for the proposed project. The Historic Resources Evaluation Report included several elements typically found in an HSR, including historical background and context, an existing conditions survey, and evaluation of significance.

As discussed in response to comment L1-2, based on public comments received during the EIR 45-day public review period, the Draft EIR has been revised to include an additional alternative, the Spring House Deterioration

² Slaton, Deborah. U.S Department of the Interior, National Park Service, Technical Preservation Services. Preservation Briefs #43 – The Preparation and Use of Historic Structure Reports. <http://www.nps.gov/hps/tps/briefs/brief43.htm> (accessed March 21, 2013).

COMMENTS

RESPONSES

Prevention Alternative, that combines the proposed project with the No Project Alternative and Spring House Rehabilitation Alternative. This new, hybrid alternative will be staff's recommended alternative to the City Council. Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas, but the Spring House structure would not be partially demolished. It would be mothballed by a qualified historic architect. If the City Council ultimately adopts an alternative that would include rehabilitation or restoration, an HSR would be prepared once funding is available to move forward with rehabilitation of the Spring House structure.

- L1-4** This comment is a recommendation that the City Council adopt the Spring House Restoration or Spring House Rehabilitation Alternative, along with preserving the contributing features of the historic district. All project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any or all of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity.
- L1-5** This comment states that an HSR should be prepared prior to any further action being taken on the EIR. Refer to response to comment L1-3. If an alternative that would include restoration or rehabilitation of the Spring House is approved by the City Council, an HSR will be prepared once funding is available to move forward with rehabilitation or restoration of the Spring House structure. However, an HSR is not required to analyze the impacts of the proposed project in conformance with CEQA.

COMMENTS

RESPONSES

Letter O1: Nina Babiarz

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

Mr. Jacobs:

- O1-1. For the record, I am one of those La Mesa residents that is interested in the preservation of the heritage of La Mesa – and its current and future civic health and as such provide the following public comment in relation to the City of La Mesa Development Department has recently released a Draft Environmental Impact Report (DEIR) for the Collier Park Master Plan.
 Specific to the Collier Spring House, I strongly support the major goals of the plan that call for improving and upgrading the existing facilities, adding new gathering, event, and recreational facilities, and generally making the park more attractive for visitors, while discouraging the loitering of those who are using the park for illicit and illegal activities.
- O1-2. I believe that it is completely unacceptable to even consider the plan's current "preferred alternative," as written in the Draft EIR, for the complete demolition to the historic 1907 Collier Spring House (one of the few buildings in La Mesa that has been determined to be eligible for both the California and National Registers of Historic Places as well as a listed City Landmark). It may be an alternative under consideration, however, erroneously named as 'preferred' by whom? Demolition is an irreversible action to a historical property and should never be deemed as 'preferred'. Pictures would merely simulate and not replace the actual experience of entering this historic structure.
- O1-3. I strongly support the Rehabilitation Alternative. The restored and rehabilitated Spring House clearly provides a better match for the uses called out to replace it in the plan. The rehabilitated Spring House could be used for the proposed interpretive facility to help educate Park visitors to the site and community's history as well as providing support space for the Park's proposed new amphitheater and group event spaces.
- O1-4. I believe all efforts to make certain that the Spring House Rehabilitation Alternative becomes part of the preferred plan for the final Collier Park Master Plan should be explored. Losing this piece of La Mesa history is sacrificing our village's unique character and the story behind those people that helped to build it.

Sincerely,



Nina Babiarz
 La Mesa Resident (16 years) and
 La Mesa historical Society Member

- O1-1 This comment introduces the commenter and expresses support for the major goals of the proposed project. No further response is required.
- O1-2 This comment refers to the proposed project as the City's "preferred alternative" and also states the project as proposed would completely demolish the Spring House. As described in detail in Chapter 4.0 of the Project Description, the existing Spring House would be partially deconstructed down to the existing stone rubble wall base and cistern. The creation of the outdoor interpretive center would include the stabilization of the Spring House concrete and stone wall structure, addition of a new concrete floor finish and water-proofing of the cistern. The existing Spring House stone rubble wall base and cistern would not be demolished. Therefore, total demolition of the Spring House would not occur under the proposed project.

 Additionally, the proposed project has not been named a preferred alternative. It is not the purpose of an EIR to select an alternative, nor does analysis in an EIR indicate that the project as proposed will be adopted by the City Council. As stated in CEQA Statute Section 21002.1, the purpose of an EIR is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. As discussed in Section 15121 of the CEQA Guidelines, an EIR is an informational document which will inform the City Council and the public generally of the significant environmental effects of the project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

 The City is considering several alternatives for the renovation of Collier Park; therefore, it is appropriate and necessary in compliance with CEQA that the EIR fully analyze the alternative with the greatest potential environmental impacts, and identify a range of reasonable alternatives that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen the significant effects of the proposed project. As stated on page 4-7 in Chapter 4, Project Description, of the Draft EIR:

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The City is exploring various options with regard to the Spring House, including restoration, rehabilitation, and adaptive reuse. For the purposes of the EIR, the proposed project addresses the partial demolition and reconstruction of the Spring House for adaptive reuse as an outdoor interpretive center, which is considered the worst-case scenario.

The City Council will consider the proposed project and all proposed alternatives when making a decision on the project. The information in the EIR does not control the City Council's ultimate discretion on the project (CEQA Guidelines 15121(b)). As stated in Section 15042 of the CEQA Guidelines, a Lead Agency may disapprove a project if necessary in order to avoid one or more significant effects on the environment that would occur if the project were approved as proposed.

The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the Spring House Deterioration Prevention Alternative. Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. Mothballing is the process of closing and protecting a building from weather and vandalism³. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure.

- O1-3** This comment identifies the commenter's support for the Spring House Rehabilitation Alternative and states the commenter's opinion that pictures cannot replace the actual experience of entering the Spring House. It is assumed that the commenter is referring to the Historic American Landscape Survey (HALS) Level II documentation of the Collier Park district required in mitigation measure Cul-1 in Section 5.4 of the Draft EIR, Cultural Resources. The HALS Level II documentation would 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 addition to photographs, documentation would include a narrative historical report and reproduction of select existing drawings. The Draft EIR does not claim that photographs would mimic the experience of entering the

³ Park, Sharon C., AIA. 1993. U.S Department of the Interior, National Park Service, Technical Preservation Services. Preservation Briefs #31 – Mothballing Historic Buildings. September.

COMMENTS

RESPONSES

Spring House. However, the City, as Lead Agency in accordance with CEQA, has determined that HALS Level II documentation (mitigation measure Cul-1), adaptive reuse of the Spring House as an outdoor interpretive center, and implementation of preservation measures (mitigation measure Cul-2) would reduce impacts to the Collier Park Historic District (including partial demolition of the Spring House) to a less than significant level. In addition, the Spring House is currently unsafe for occupancy and visitors to the Collier Park are not permitted to enter the structure. Therefore, it is not an experience currently available to visitors at Collier Park.

- O1-4** This comment further expresses the commenter’s support for the Spring House Rehabilitation Alternative. This alternative and all project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives addressed in the EIR. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. As discussed in response to comment O1-2, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt a project alternative that combines the proposed project with the Spring House Rehabilitation Alternative and the No Project Alternative. Under the staff suggested alternative, the Spring House structure would not be partially demolished.

COMMENTS

RESPONSES

Brandt-Hawley Law Group
 Chauvet House • PO Box 1659
 Glen Ellen, California 95442
 707.938.3900 • fax 707.938.3200
 preservationlawyers.com

Letter O2: Brandt-Hawley Law Group

March 11, 2013

- O2-1** This comment introduces the commenter and states that the Save Our Heritage Organisation (SOHO) opposes the demolition of the Spring House. The commenter’s specific comments in support of the opposition are addressed in responses to comments O2-2 through O2-6.
- O2-2** This comment states that, based on a referenced court case (*League for Protection v. City of Oakland*⁴), mitigation measures Cul-1 and Cul-2 do not reduce the proposed project’s cultural resources impact related to demolition of the Spring House to a less than significant level. This court case did not conclude that demolition of a historic structure cannot be mitigated; only that demolition of a historic structure is a significant impact and cannot be approved without preparation of an EIR. The court did find that, for the specific structure that was the subject of the case, the effects of the demolition were not reduced to a level of insignificance by documentation and unspecified design elements which may incorporate features of the original architecture into an entirely different shopping center.

Chris Jacobs, Senior Planner *via email*
 City of La Mesa
 Planning & Zoning Division
cjacobs@ci.la-mesa.ca.us

Subject: Collier Park Draft EIR

Dear Mr. Jacobs:

Please accept these EIR comments on behalf Save Our Heritage Organisation (SOHO) regarding the Collier Park Draft EIR. SOHO is a California nonprofit corporation formed in 1969 to lead the San Diego community as a catalyst for historic preservation by raising awareness and appreciation of the region’s rich architectural and cultural heritage. My law practice is focused on the application of CEQA to historic resources statewide, including cases such as *Friends of Sierra Madre v. City of Sierra Madre*, *Lincoln Place Tenants Association v. City of Los Angeles*, *League for Protection v. City of Oakland*, *Architectural Heritage Association v. County of Monterey*, and *Preservation Action Council v. City of San Jose*, among many others.

O2-1.

SOHO opposes the demolition of the 1907 Spring House:

1. Under the *League for Protection* case, referenced above, and CEQA Guidelines section 15164.5, the proposed demolition of the Spring House would have a significant environmental impact that cannot be mitigated to insignificance by archival recordation or compensatory mitigation, referenced in the EIR mitigation measures CUL-1 and CUL-2. Please amend the EIR to acknowledge the significant impact.

O2-2.

2. Has the current condition of the Spring House been recently assessed by an historic preservation architect or engineer? If so, please provide a copy of the assessment and findings. This is a necessary part of the Environmental Setting.

O2-3.

The Draft EIR for the Collier Park Improvements project does not conclude that documentation alone would reduce impacts related to the Collier Park Historic District (including partial demolition of the Spring House) to a less than significant level. Adaptive reuse of the Spring House as an outdoor interpretive center and implementation of preservation measures (mitigation measure Cul-2) are also required to reduce impacts to a less than significant level. The outdoor interpretive center does not contain unspecified design features or propose an entirely different structure. As discussed in response to comment O1-2, the creation of the outdoor interpretive center would include the stabilization of the Spring House concrete and stone wall structure and water-proofing of the cistern. These features of the existing Spring House structure would not be demolished and would be incorporated into the outdoor interpretive center. The City has determined that the combination of adaptive reuse of the Spring House plus mitigation measures Cul-1 and Cul-2 that require documentation and preservation measures are adequate to reduce impacts to the Collier Park Historic District a less than significant level. The referenced court case does not apply to the proposed project because of the major differences in the circumstances of the two projects.

⁴ League For Protection Of Oakland’s Architectural And Historic Resources, Plaintiff And Appellant, v. City Of Oakland Et Al., Defendants And Respondents; Montgomery Ward & Co., INC., et al., Real Parties in Interest and Respondents. 52 Cal.App.4th 896, No. A074348, Court of Appeal, First District, Division 1, California.

COMMENTS

SOHO EIR Comment Letter
 March 11, 2013
 Page 2 of 2

O2-4. 3. Isn't it true that the proposed reuse of the Spring House site as an "outdoor interpretive center" will destroy its character-defining features and fails to comply with the *Secretary of the Interior's Standards*?

O2-5. 4. What are the actual, itemized costs to restore the Spring House using the California Historic Building Code and the *Secretary's Standards*?

O2-6. 5. Isn't the demolition of the Spring House inconsistent with the General Plan's mandate to preserve and improve historic buildings?

O2-7. Please amend and recirculate the EIR as requested to fairly consider the feasibility of restoration of the Spring House.

Thank you very much.

Sincerely,

Susan Brandt-Hawley

RESPONSES

O2-3 This comment asks if the current condition of the Spring House has been assessed by a historic preservation architect or engineer, and requests a copy of the assessment and findings. A Historic Structures Report (HSR) has not been prepared for the project (see response to comment L1-3). However, this type of assessment does not include all of the elements necessary to provide an adequate analysis of potential impacts required for a CEQA analysis, and is not necessary to describe the existing setting of the Spring House for the purposes of CEQA analysis.

For the purposes of the EIR analysis, ASM Affiliates, Inc. prepared a Historic Resources Evaluation Report for the proposed project. It is included as Appendix E to the Draft EIR. In addition, a Cultural Resource Survey was prepared by Noah Archaeological Consulting in 2009, which is provided as Appendix D of the Draft EIR. This report evaluated the historical significance of the entire project site (including the Spring House), determined the potential impacts of the proposed project on the historical significance of the project site, and proposed mitigation measures to reduce impacts to a less than significant level. Therefore, the Historic Resources Evaluation Report was the appropriate and adequate document to prepare in support of the Draft EIR for the proposed project. The report included an evaluation of the current condition of the Spring House and is included as Appendix E to the EIR. The commenter may obtain a copy of the report from the City's Planning Department during normal business hours or on the City's website.

O2-4 This comment states that the reuse of the Spring House as an interpretive center will destroy character-defining features and fails to comply with the Secretary of the Interior's Standards. The Draft EIR concludes in Section 5.4.4.2, Historical Resources, the partial demolition and reuse of the Spring House 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. Therefore, implementation of the proposed project would result in a potentially significant impact associated with historical resources. Section 15064.5(b)(3) of the CEQA Guidelines states that compliance with the Secretary of the Interior's Standards for the Treatment of Historical Properties would generally reduce impacts to a less than significant level, however, it does not require implementation of these standards in order to reduce impacts to less than significant. The City has determined that the combination of adaptive reuse of the Spring House plus mitigation measures Cul-1 and Cul-2 that require documentation and preservation measures are adequate to reduce impacts to the Collier Park Historic District a less than

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significant level. The Draft EIR does not make any claim regarding compliance of the outdoor interpretive center with the Secretary of the Interior's Standards.

The Draft EIR includes two alternatives that would implement Secretary of the Interior Standards for the Spring House and associated features. Under the Spring House Rehabilitation Alternative, the Spring House structure and other contributing features to the Collier Park historic district would be rehabilitated in accordance with the Secretary of Interior's Standards for Rehabilitation. Under the Spring House Restoration Alternative, the Spring House and other contributing features to the Collier Park historic district and would be restored in accordance with the Secretary of the Interior's Standards for Restoration. In addition, as discussed in response to comment L1-2, the Draft EIR has been revised to include an additional alternative that combines the proposed project with the No Project Alternative and Spring House Rehabilitation Alternative. Under this alternative (Spring House Deterioration Prevention Alternative), the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities would be pursued for restoration, rehabilitation or repurposing of the structure. This alternative is described in detail and compared to the proposed project in Section 8.2.5 of the Final EIR. All project alternatives will be considered by the City Council at the time of project approval.

- O2-5** This comment requests to know the cost of restoration of the Spring House. A detailed cost analysis is not provided in the Draft EIR because it is not the appropriate location for this type of analysis. As stated in Section 15131 of the CEQA Guidelines, economic effects of a project shall not be treated as significant effects on the environment. The projected cost of the alternatives does not affect the potential environmental effects of the alternatives; therefore, a detailed economic analysis is not warranted.

A preliminary review and analysis of development alternatives was prepared for the Collier Park renovations by Keyser Marston Associates in 2011. This document is listed as a reference in Chapter 9.0 of the Draft EIR, References, and is available for review at the City of La Mesa Community Development Department, located at 8130 Alison Avenue in La Mesa. Hours of operation are Monday through Friday, 7:30 a.m. to 5:30 p.m. (La Mesa City Hall is closed every other Friday). The analysis determined that the outdoor interpretive center alternative for the Spring House area would cost approximately \$380,000, while rehabilitation of the Spring House structure would cost approximately \$913,000. This analysis was based on standard construction practices and did not take into account

COMMENTS

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implementation of the Secretary of the Interior's Standards for Rehabilitation. It is anticipated that compliance with the Secretary of the Interior's Standards would result in additional costs.

The appropriate place for discussion of economic considerations related to the proposed project is in the CEQA Candidate Findings regarding the feasibility of the project alternatives that will be considered by the City Council at the time of project approval. As stated in Section 15091 of the CEQA Guidelines, a Lead Agency may reject an alternative in the Findings if a specific economic, legal, social, technological, or other consideration makes the alternative infeasible. The Findings will include detailed information regarding any economic factors that contribute to the feasibility of an alternative, including cost of implementation of the alternative.

- O2-6** This comment questions if the demolition of the Spring House is consistent with a General Plan mandate to preserve and improve historic buildings. The City's Historic Preservation Element establishes the City's goals for preservation and cultural resource management. Although preservation is encouraged, the Historic Preservation Element does not prohibit the demolition or alteration of historic sites and districts. Additionally, the Historic Preservation Element includes a policy that encourages the use of historic sites for educational purposes. Therefore, the proposed project is not inconsistent with the City's General Plan.
- O2-7** This comment states that the EIR should be amended as requested in comments O2-2 through O2-6 and that the amended EIR be recirculated for public review. As identified in Section 15088.5 of the CEQA Guidelines, recirculation is only required if the following are identified: new significant environmental impacts; an increase in the severity of project impacts; or new feasible alternatives or mitigation measures that are considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project. This letter, along with the other letters received during the Draft EIR public review period, does not result in the identification of any of the criteria requiring recirculation of the Draft EIR. Minor clarifications have been made as part of the Final EIR as a result of the comment letters received, and a new alternative has been identified that is not considerably different from the previously analyzed alternatives. The Final EIR is fundamentally adequate as an information document for the public and decision-makers.

COMMENTS

RESPONSES

Linda A. Canada
Your History Matters

Letter O3: Linda Canada

Researching, writing, and speaking about local history
 (858) 457-9676

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www.yourhistorymatters.com

March 8, 2013

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

Re: Draft EIR – Collier Park Master Plan

Dear Mr or Ms Jacobs:

O3-1.

I am a resident of the City of San Diego, and a historian specializing in the history of the San Diego region. Personally, I am one of the millions of Americans who plans their vacation travel to include visits to historic sites.

O3-2.

I am writing to urge you to incorporate the Spring House Rehabilitation Alternative into the DEIR.

How disappointing it would be to discover that the City of La Mesa had demolished a historic resource in order to build a replica with an interpretive center explaining the significance of the destroyed resource!

I strongly urge you revise the DEIR to incorporate the Spring House Alternative. For residents of the City of La Mesa, and for the hundreds of thousands of visitors to the San Diego region, preservation of the Spring House will provide one more piece of the puzzle critical for understanding local history.

Sincerely,



Linda A. Canada

O3-1 This comment introduces the commenter. It does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is required.

O3-2 This comment expresses support for the Spring House Rehabilitation Alternative and requests that it be incorporated in the Draft EIR. This alternative was identified and analyzed as a project alternative in Chapter 8.0, Alternatives, of the Draft EIR. This alternative and all project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives addressed in the EIR. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity.

The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project’s potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

COMMENTS

RESPONSES

Letter O4: Gregory Childs

GREGORY CHILDS
 4604 Date Avenue, La Mesa, CA 91941
 Telephone (619) 464-8285

March 5, 2013

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

Dear Mr. Jacobs:

O4-1.

I'm writing to express my strong concern about the Collier Park Renovations Project because the Environmental Impact Report (EIR) 1.2 Project Description states that in the Spring House Area "the proposed project addresses the partial demolition of the Spring House and replacement with an outdoor interpretive center..." It is not acceptable to have the City demolish (there is no such thing as 'partial demolition') such a significant historical structure that has already been designated as part of an Historical Landmark site.

O4-2.

I believe that the Section 8.1 Alternatives "Spring House Rehabilitation Alternative" should not be an alternative, but should be the first and foremost purpose of the project. The City of La Mesa established Project Objectives 3), which states "Acknowledge the historical aspects of Collier Park and the Spring House through overall design, renovation, and interpretation." It is impossible to acknowledge the Spring House in any meaningful way if it is not "saved" for the future citizens of La Mesa.

Sincerely,



Gregory A. Childs

O4-1

This comment expresses the commenter's opinion that it is not acceptable for the City to demolish the Spring House. The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. All project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity.

The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

O4-2

This comment expresses support for the Spring House Rehabilitation Alternative. As stated in the response to comment O4-1, this alternative and all project alternatives will be considered by the City Council at the time of project approval. The EIR does not provide a recommendation to the City Council; however, City staff is planning to recommend that the City Council adopt a project that would not demolish the Spring House.

COMMENTS

RESPONSES

Letter O5: Ruth Contino

March 8, 2013

Chris Jacobs, Senior Planner
City of La Mesa
8130 Allison Avenue
La Mesa, CA 91942

Dear Mr. Jacobs,

O5-1.

I am a board member of the La Mesa Historical Society and I have to agree that the historic resources of Collier Park need to be preserved, especially the Spring House.

Please consider the Rehabilitation Alternative, with the restored and rehabilitated Spring House. It would be such a loss for La Mesa if it were to be demolished.

Sincerely,



Ruth Contino

O5-1

This comment expresses support for the Spring House Rehabilitation Alternative. This alternative and all project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives addressed in the EIR. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.



Crawford Historic Services

Historic Properties Consultant

March 9, 2013

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

RE: Collier Park Master Plan DEIR

Dear Mr. Jacobs,

O6-1.

I am writing to support the inclusion of the Spring House Rehabilitation Alternative in the Preferred Plan for the Final Collier Park Master Plan. I am a La Mesa resident of 42 years, a former history professor at San Diego State University for 25 years, and owner of Crawford Historic Services for 30 years, a consulting firm for historic and architectural services. As a member of the La Mesa Historical Society and former Assistant Editor of the *La Mesa Courier*, I feel very strongly that La Mesa's historic resources must be preserved for future generations. Our city is now one hundred years old, and we have a fundamental responsibility and obligation to preserve our community's treasures and most important historic resources.

I have reviewed the Draft EIR for the Collier Park Master Plan, and consider it imperative that the Spring House be preserved. The Spring House is a City of La Mesa Historical Landmark and potentially eligible for nomination to the National Register of Historic Places. This important historic resource is part of the long heritage of the city of La Mesa and must be retained as one of the few remaining resources from the formative period of La Mesa's history.

O6-2.

As Senior Architectural Historian for various environmental companies over the last 25 years, I have prepared many environmental impact reports and have also documented historic resources through the HABS/HAER process, one of the mitigation measures proposed for the Spring House. While this mitigation measure can be used when there is no other possible alternative to save an historic property, it is ultimately a limited, and relatively inadequate, measure to convey the history of a site.

O6-3.

As an educator, I know that experiencing an historic site in situ with all its historic components intact is far more enriching than an interpretive exhibit in its place. An exhibit simply cannot convey the same impact and sense of history that viewing the actual building in its original location can. With a dedicated team of experienced professionals, restoration and rehabilitation of the Spring House can definitely be achieved, thereby creating another "jewel" for La Mesa.

O6-4.

The demolition of the Spring House is a significant adverse effect to a listed, or eligible for listing, historical resource. The demolition of one of La Mesa's most important historical resources is an irreversible effect, one that is NOT adequately mitigated by photographs, drawings and an interpretive exhibit. The City of La Mesa will not be in compliance with professional historic preservation standards and will lose a significant opportunity to be a leader in historic preservation.

O6-5.

The historic resources of cities and towns across the United States are being lost at an alarming rate and much of our collective heritage has been demolished. It is critically important to save these places that tell us about our early history, they serve as fundamental elements that allow future generations to understand the origins and development of our collective values and heritage.

Letter O6: Kathleen A. Crawford (Crawford Historic Services)

O6-1

This comment introduces the commenter and expresses support for the Spring House Rehabilitation Alternative. This alternative and all project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives addressed in the EIR. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

O6-2

This comment incorrectly states that HABS/HAER (Historic American Building Survey/Historic American Engineering Record) documentation is proposed as a mitigation measure for the Spring House. Mitigation measure Cul-1 proposes Historic American Landscape Survey (HALS) documentation for the project site, which is intended to record historic landscapes. Historic landscapes include all features that contribute to a historic area, such as structures and trees, rather just one component, such as a single building. HABS documentation applies to individual buildings, and HAER documentation applies to historic sites and structures related to engineering and industry. As discussed in Section 5.4 of the Draft EIR, Cultural Resources, Collier Park is considered a historic district because it is a large area that contains a variety of resources (buildings, structures, landscape features,

COMMENTS



Crawford Historic Services

Historic Properties Consultant

O6-6.

Therefore, I strongly urge the inclusion of the Spring House Rehabilitation Alternative in the final environmental impact report prepared for Collier Park. It is critically important that this element of La Mesa's centennial history be preserved and restored for future generations.

Sincerely,

Kathleen A. Crawford, M.A.
Crawford Historic Services

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plant-life, scenic conditions) which have special historical, cultural, architectural, community, and/or aesthetic value. Therefore, HALS documentation is the appropriate documentation for the contributing features to the Collier Park District.

Further, the Draft EIR does not conclude that HALS documentation alone would reduce impacts to the Collier Park Historic District (including the Spring House as a contributing element) to a less than significant level. Adaptive reuse of the Spring House as an outdoor interpretive center and implementation of the preservation measures identified in mitigation measure Cul-2 would also be required to reduce impacts to the Collier Park Historic District (including partial demolition of the Spring House) to a less than significant level.

O6-3

This comment expresses the opinion that a rehabilitated structure would provide a more enriching experience than an interpretive center. Refer to response to comment O6-1. The Spring House Rehabilitation Alternative and all project alternatives will be considered by the City Council at the time of project approval. The EIR does not provide a recommendation to the City Council; however, City staff is planning to recommend that the City Council adopt a project that would not demolish the Spring House.

O6-4

This comment states that the proposed project's impacts to the Spring House structure should be considered significant and unavoidable. CEQA does not require historical resources to be avoided or preserved in order to be considered a less than significant impact. Section 15064.5 of the CEQA Guidelines addresses how to determine significant impacts to archaeological and historical resources. The proposed project was determined to result in a significant impact to historical resources because it would result in a substantial adverse change to the contributing features 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 (see Section 5.4.4.1 of the Draft EIR, Historical Resources). Section 15064.5(b)(4) of the CEQA Guidelines states that a lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of a historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures. The CEQA Guidelines give lead agencies the authority to identify mitigation measures to reduce impacts to historical references; they do not prescribe mitigation.

The Historic Resources Evaluation Report (ASM Affiliates, Inc.) prepared for the proposed project identified mitigation measures Cul-1 and Cul-2 to reduce the proposed project's potential impacts to the Collier Park Historic District, including

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the Spring House. The report was prepared by qualified historians and is included as Appendix E to the Draft EIR. The report recommended the mitigation measures included in Section 5.4, Cultural Resources, of the Draft EIR and determined that the implementation of these measures would reduce the significant impact to historical resources to a less than significant level. The City agrees with the findings of this report.

Chapter 7.0, Recommended Mitigation, of the Historic Resources Evaluation Report (Appendix E to the Draft EIR) provides a detailed discussion of the mitigation measures' ability to reduce impacts to a less than significant level. Because avoidance of the contributing elements to the Collier Park Historic District is not feasible to implement the proposed project, the report requires Historic American Landscapes Survey (HALS) Level II documentation of the Collier Park Historic District (mitigation measure Cul-1), as well as the additional requirements listed in mitigation measure Cul-2. According to Section 15126.4(a) (4) of the CEQA Guidelines, "the mitigation measure must be 'roughly proportional' to the impacts of the project." The proposed project would result in a partial demolition of the Spring House, reconstruction of the drinking fountain, demolition of the stone bridge and tennis courts, and removal of several trees and landscaping elements in the southeastern and northern sections of the park, which are all contributing features of the Collier Park Historic District. These changes to Collier Park will significantly alter the current and historic landscape of the park in such a way that several mitigation measures, including preservation measures, would be needed to mitigate the impact.

Documentation through HALS would be mandatory if the proposed project is approved, which requires documentation of the current park before alterations associated with the project begin (mitigation measure Cul-1). After the proposed improvements are implemented, interpretive signage is required to be constructed to illustrate to park patrons and members of the public what features of the landscape and District have been altered (mitigation measure Cul-2). Additionally, the undamaged portions of the drinking fountain roof frame and tiles and a portion of the natural landscape would be preserved and incorporated into the proposed project design (mitigation measure Cul-2). Finally, a financial contribution in support of a related preservation project in La Mesa is required, as well as oral history interviews with individuals that have an association with the history of Collier Park (mitigation measure Cul-2). The City has determined that the mitigation measures proposed are roughly proportional to the impacts of the project.

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The recommended mitigation measures in the Historic Resources Evaluation Report have been incorporated into the proposed project. The Mitigation Monitoring and Reporting Program for the proposed project will identify the responsible parties for implementation of these measures, timing for implementation, and required documentation of implementation, consistent with Section 15064.5(b)(4) of the CEQA Guidelines. The City, as the Lead Agency for the proposed project, has determined that these mitigation measures would reduce the project's impacts related to historical resources to a less than significant level.

- O6-5** This comment expresses the commenter's thoughts regarding the loss of historic resources across the United States and the importance of protecting these resources. This comment does not address the adequacy or accuracy of information provided in the Draft EIR. However, as stated in response to comment O6-1, all project alternatives will be considered by the City Council at the time of project approval. City staff is planning to recommend that the City Council adopt a project that would not demolish the Spring House.
- O6-6** This comment reiterates support for the Spring House Rehabilitation Alternative. Refer to response to comment O6-1.

COMMENTS

RESPONSES

Letter O7: Laurise and John Gerk

March 4, 2013

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, California 91942

Re: DEIR for the Collier Park Master Plan

Dear Mr. Jacobs,

- | | | | |
|--------------|---|-------------|---|
| O7-1. | <p>We have read the Draft Environmental Impact Report for the Collier Park Master Plan, and can not understand why our community would for one minute consider demolishing one of the few Historic Landmarks in our City. The Spring House at Collier Park.</p> | O7-1 | <p>This comment expresses support for an alternative that would not demolish the Spring House. The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. All project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project’s potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.</p> |
| O7-2. | <p>La Mesa has just celebrated 100 years of existence. We as a community put a lot of effort and pride into that celebration. I helped with the float for our centennial, and we have contributed to the Legacy Project. We all should feel pride in those structures that we are so fortunate to still have as a legacy to our early days, our beginnings. Pictures or Interpretive Centers can not replace what is real, solid, substantial and existent of our past. The Spring House may be in poor repair, but it still exists. It is real, solid, substantial, and existent. But only as long as we keep it so. And that is what responsible custodians do with their heritage.</p> | | |
| O7-3. | <p>We are 100% against any resolution that will demolish the Spring House at Collier Park, and look to the City to maintain such aspects of our history for the generations to come.</p> | | |

Sincerely,
 Laurise and John Gerk

COMMENTS

RESPONSES

Letter O8: Joe Glidden

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

March 9, 2013

Dear Mr. Jacobs:

Thank you for trying to return my call last week. I am sorry that we did not have a chance to connect.

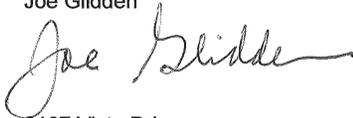
I am concerned that the City might choose to demolish the Collier Park Spring House rather than restore it as an historic landmark.

O8-1. I would much prefer that all options for its restoration be pursued before considering such a drastic solution as demolition.

Please give the community a chance to solve this problem before the City proceeds any further.

Thank you for listening to my concerns.

Joe Glidden



8167 Vista Drive
 La Mesa, CA 91941
 (619) 460-6668
 jfglidden@cox.net

O8-1 This comment expresses support for an alternative that would not demolish the Spring House. The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. All project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

COMMENTS

HERITAGE
ARCHITECTURE & PLANNING



RESPONSES

Letter O9: David Marshall (Heritage Architecture and Planning)

March 7, 2013

CITY OF LA MESA
Planning & Zoning Division
8130 Allison Avenue
La Mesa, CA 91942

Attention: Chris Jacobs, Senior Planner

Subject: Collier Park Draft EIR

Dear Mr. Jacobs:

O9-1.

As a longtime La Mesa resident and preservation architect, I read the Collier Park Draft Environmental Impact Report (EIR) with great interest. My primary concerns are any threats to the landmark Spring House and other historic features within Collier Park. I have been following this issue since 2007, attended the Master Plan Workshops in 2008, and I have spoken before the Historic Preservation Commission twice on this topic.

O9-2.

As you may know, the Spring House is the only remaining building from the original spring period. La Mesa's connection to the springs is significant, especially given that our city was originally named "Allison Springs" (1890's) then "La Mesa Springs" (1894 to 1912). This historically listed building and surrounding park should be at the top of the City's list of important heritage sites, worthy of protection and preservation.

O9-3.

In the EIR, the City refers to their proposed "Renovations Project" -- which includes demolition of the Spring House -- as the "worst-case scenario" as far as negative environmental impacts (p1-2). I wholeheartedly agree that this would be the worst-case scenario. Why then is this being pushed as the City's recommended project? The EIR is woefully inadequate when it comes to justifying the demolition option. In fact, there is no reason given whatsoever. The EIR even states that it can meet all four Project Objectives if the Spring House is retained and rehabilitated (p8-9). On March 5,

O9-4.

2013 the Historic Preservation Commission passed a motion strongly rejecting the demolition option and recommending either restoration or rehabilitation of the Spring House.

O9-5.

The EIR's Historic Resources Evaluation Report states that Collier Park is eligible to be placed on the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) (piii). However, if the proposed project and demolition of the Spring House were to be completed it would destroy the historic integrity of Collier Park and cause it to no longer be eligible for either listing. How can this be a "less than significant" impact after mitigation? Demolition of a listed, or eligible for NRHP listing, property would require a Statement of Overriding Considerations -- and no such document has been provided.

O9-6.

The EIR's Historic Resources Evaluation Report states that Collier Park is eligible to be placed on the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) (piii). However, if the proposed project and demolition of the Spring House were to be completed it would destroy the historic integrity of Collier Park and cause it to no longer be eligible for either listing. How can this be a "less than significant" impact after mitigation? Demolition of a listed, or eligible for NRHP listing, property would require a Statement of Overriding Considerations -- and no such document has been provided.

O9-7.

Considerations -- and no such document has been provided.

O9-1

This comment introduces the commenter. It does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is required.

O9-2

This comment provides information about the Spring House and expresses the opinion that it should be on the top of the City's list for protection and preservation. It does not address the adequacy or accuracy of information provided in the Draft EIR. However, based on this comment and similar public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

O9-3

This comment concurs with analysis of the proposed project as the worst-case scenario for renovation of Collier Park. No further response is necessary.

O9-4

This comment refers to the proposed project as the City's "recommended project" and implies that the project as proposed has been selected by the City Council for implementation. Additionally, the comment implies that the Draft EIR should justify selection of the project as proposed. Refer to response to comment O1-2. It is not the purpose of an EIR to select an alternative, nor does analysis in an EIR indicate that the project as proposed will be adopted by the City Council. As stated in CEQA Statute Section 21002.1, the purpose of an EIR is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. The EIR does not provide a recommendation to the City Council. However, as discussed in response to comment O9-2, based on public

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comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt a project that would not result in demolition of the Spring House.

- O9-5** This comment correctly states that the Draft EIR determined that the Spring House Rehabilitation Alternative would meet all four project objectives, and that the City's Historic Preservation Commission recommended restoration or rehabilitation of the Spring House over reuse as an interpretive center. This comment does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is required.
- O9-6** This comment states that the proposed project's impacts to the Spring House structure should be considered significant and unavoidable. Refer to response to comment O6-4 regarding the City's determination that impacts would be reduced to a less than significant level with implementation of mitigation measures Cul-1 and Cul-2. CEQA does not require historical resources to be avoided or preserved in order to be considered a less than significant impact.
- O9-7** This comment states that a statement of overriding considerations should be provided for the proposed project. As stated in Section 15093(b) of the CEQA Guidelines, a statement of overriding considerations is required when the lead agency approves a project which will result in the occurrence of significant effects which are identified in the Final EIR but are not avoided or substantially lessened such that they would result in unavoidable environmental impacts. The City has determined that all of the potentially significant environmental impacts identified for the proposed project are capable of being mitigated to below a level of significance. Refer to response to comment O6-4 regarding the City's determination that impacts to historical resources would be reduced to a less than significant level with implementation of mitigation measures Cul-1 and Cul-2. Therefore, a statement of overriding considerations is not applicable to the proposed project. Additionally, a statement of overriding considerations, if required, is not typically circulated during the public review period with the Draft EIR. As stated in Section 15093(c) of the CEQA Guidelines, the statement of overriding considerations should be included in the record of project approval and mentioned in the notice of determination following project approval and certification of the Final EIR.



- 09-8.** The EIR refers to the “high cost of restoration” (p1-4), but includes no backup information or cost estimates to support this statement. Oddly enough, the EIR does refer to a mitigation measure (if demolition occurs) to give a “financial contribution in support of a related preservation or restoration project in the City of La Mesa” (p1-11). If the City is willing to use funds to support another restoration project why aren’t those funds instead being directed to restore the City-owned Spring House?
- 09-9.**
- 09-10.** The mitigation measures associated with the demolition of the Spring House are insignificant and inadequate. One of the mitigations is to do Historic American Landscape Survey (HALS) documentation, including reproducing “select existing drawings” (p1-10). From what I understand there are no existing drawings of the Spring House. This mitigation measure should require Level I Historic American Buildings Survey (HABS) drawings and documentation.
- 09-11.** The EIR’s limited assessment of the Spring House indicates that the building is in “disrepair,” “dilapidated,” with “advanced deterioration” and “seismic hazards,” but there is nothing indicating that a qualified architect or structural engineer was ever engaged to investigate the condition of the building. A Historic Structures Report (HSR) should be completed for the Spring House prior to any work on the building. On March 5, 2013 the Historic Preservation Commission passed a motion recommending an HSR.
- 09-12.**
- 09-13.** For unknown reasons, the City has disregarded the results of their own public workshops where “preservation of the Spring House [was] highly ranked as being most important by the majority of participants” (p4-3). The City needs to explain why demolition of the Spring House is in the EIR as part of the proposed project.
- 09-14.** The rendering in Figure 4-2 can in no way be considered a “reconstruction” under *The Secretary of the Interior’s Standards (The Standards)*. The result of these changes would result in nothing short of demolition. The rendering also doesn’t match the mitigation measure to save the original foundations and build an Interpretive Center around it. The rendering shows a completely new structure. Any modifications to the Spring House and other historic features within Collier Park must follow the recommendations of the HSR and must comply with *The Standards*.
- 09-15.**
- 09-16.** The EIR states that the Spring House restoration alternative doesn’t meet two of the four project objectives because the new Collier Club House would not be built (p8-14). This conclusion is incorrect and deceiving. There is nothing in the restoration alternative that would prevent the Collier Club House from being built on the hill. The Spring House actually provides much better support for any special uses such as weddings, catering, or other events.
- 09-17.**

09-8 This comment requests documentation of the statement in Chapter 8.0 of the EIR, Alternatives, that the Spring House Restoration Alternative may not be economically feasible given the high cost of restoration. A preliminary Review and Analysis of Development Alternatives was prepared for the Collier Park renovations by Keyser Marston Associates in 2011. This document is listed as a reference in Chapter 9.0 of the Draft EIR, References, and is available for review at the City of La Mesa Community Development Department, located at 8130 Alison Avenue in La Mesa. Hours of operations are Monday through Friday, 7:30 a.m. to 5:30 p.m. (La Mesa City Hall is closed every other Friday). The analysis determined that the outdoor interpretive center alternative for the Spring House area would cost approximately \$380,000, while rehabilitation of the Spring House structure would cost approximately \$913,000. This analysis was based on standard construction practices and did not take into account implementation of the Secretary of the Interior’s Standards for Rehabilitation. It is anticipated that compliance with the Secretary of the Interior’s Standards would result in additional costs. Based on the information in the Keyser Marston analysis, the Draft EIR correctly states that restoration of the Spring House would be more costly than the proposed outdoor interpretive center.

A detailed cost analysis is not provided in the Draft EIR because it is not the appropriate location for this type of analysis. As stated in Section 15131 of the CEQA Guidelines, economic effects of a project shall not be treated as significant effects on the environment. The projected cost of the alternatives does not affect the potential environmental effects of the alternatives; therefore, a detailed economic analysis is not warranted.

The Draft EIR does not determine whether this alternative, or any other alternative, is infeasible. It discloses the likelihood that this alternative may be considered infeasible by the City Council based on available information about alternative costs. Findings regarding the feasibility of the project alternatives will be considered by the City Council at the time of project approval. As stated in Section 15091 of the CEQA Guidelines, a Lead Agency may reject an alternative in the Findings if a specific economic, legal, social, technological, or other consideration makes the alternative infeasible.

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- O9-9** This comment states that the funds referenced in mitigation measure Cul-2 for support of preservation or restoration project in the City should be used to restore the Spring House. Refer to response to comment O9-8. A detailed cost analysis is not provided in the Draft EIR because it is not the appropriate location for this type of analysis, including cost of alternatives. As discussed in response to comment O9-2, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt a project that would not result in demolition of the Spring House.
- O9-10** Refer to response to comment O6-4 regarding the City's determination that impacts would be reduced to a less than significant level with implementation of mitigation measures Cul-1 and Cul-2. This comment also states that mitigation measure Cul-1 should require Historic American Buildings Survey (HABS) Level I documentation rather than Level II documentation. Level I documentation is similar to Level II documentation. Level II documentation differs from Level I by substituting copies of existing drawings, either original or alteration drawings, for recently executed measured drawings. Generally, Level I documentation is required for nationally significant buildings and structures, defined as National Historic Landmarks and the primary historic units of the National Park Service⁵. The Spring House is not a designated nationally significant structure; therefore, Level II documentation is adequate for the proposed project.
- O9-11** This comment states that the Draft EIR does not provide any evidence in its assessment of the Spring House in Section that a qualified professional investigated the condition of the Spring House. The information provided in Section 5.4.2.5 of the Draft EIR, Historic Evaluation is based on the Historic Resources Evaluation Report prepared by ASM Affiliates, Inc. (2012). The report is provided as Appendix E of this EIR, as stated on page 5.4-1 of the Draft EIR.
- O9-12** This comment states that a Historic Structures Report should be prepared for the Spring House prior to any work on the building. Refer to response to comment L1-3. If a project alternative that would rehabilitate or restore the Spring House is approved by the City Council, an HSR would be prepared once funding is available to move forward with rehabilitation or restoration of the Spring House structure.
- O9-13** This comment states that the Draft EIR needs to explain why demolition of the Spring House is included in the EIR as part of the proposed project. The City is considering several alternatives for the renovation of Collier Park; therefore, it is appropriate and necessary in compliance with CEQA that the EIR fully analyze the

⁵ National Park Service. 2013. Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines [As Amended and Annotated]. http://www.nps.gov/history/local-law/arch_stnds_6.htm (accessed March 25, 2013).

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alternative with the greatest potential environmental impacts, and identify a range of reasonable alternatives that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen the significant effects of the proposed project. As stated on page 4-7 in Chapter 4, Project Description, of the Draft EIR:

The City is exploring various options with regard to the Spring House, including restoration, rehabilitation, and adaptive reuse. For the purposes of the EIR, the proposed project addresses the partial demolition and reconstruction of the Spring House for adaptive reuse as an outdoor interpretive center, which is considered the worst-case scenario.

Therefore, the requested information has already been provided in the Draft EIR.

- O9-14** This comment states that the reuse of portion of the Spring House as an interpretive center cannot be considered reconstruction, as defined by the Secretary of the Interior's Standards, and states the Figure 4-2 does not match descriptions of the project. It is assumed that the commenter is referring to the Standards for the Treatment of Historic Properties, with guidelines for reconstruction. Reconstruction is defined as re-creating a non-surviving site, landscape, building, structure, or object in all new materials⁶. The proposed project does not meet this definition of reconstruction because it would incorporate portions of the existing Spring House and would not be constructed of all new materials. However, the Draft EIR does not state or imply that the proposed project would reconstruct the Spring House in accordance with the Secretary of the Interior's Standards. Section 4.3.2.2 of Draft EIR, Spring House, describes actions to be taking in the Spring House area as demolition. Additionally, Figure 4-2 depicts use of the existing foundation and stone wall structure as part of a new outdoor interpretive center. As stated in the Project Description, the project would include a new concrete floor finish, stabilization of the remaining concrete and stone wall structure, and installation of interpretive exhibits. Is unclear what inconsistency the commenter is referring to between Figure 4-2 and text in the Draft EIR.
- O9-15** This comment states that any modifications to the Spring House and other historic features must follow the recommendations of the HSR and must comply with the Secretary of the Interior's standards. An HSR has not been completed for the proposed project. However, all recommendations of the Historic Resources Evaluation Report prepared for the project have been incorporated into the Draft

⁶ National Park Service. 2013. Introduction to Standards and Guidelines – Choosing an Appropriate Treatment for the Historic Building. http://www.nps.gov/hps/tps/standguide/overview/choose_treat.htm (accessed March 25, 2013).

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EIR as mitigation measures Cul-1 and Cul-2 in Section 5.4, Cultural Resources. Mitigation measure Cul-1 requires HABS Level II documentation in accordance with Secretary of the Interior Standards. These are the standards applicable to the work proposed by the proposed project. Neither the La Mesa Historic Preservation Ordinance nor other applicable ordinance requires additional compliance with the Secretary of the Interior's Standards for the proposed renovations.

- O9-16** This comment suggests that the Spring House Restoration Alternative should include development of the Collier Clubhouse and History Hill area in order to meet all of the project alternatives. This comment implies that the alternative is being rejected because it does not meet all four project alternatives. The EIR does not recommend or reject alternatives. Refer to response to comment O1-2 for an explanation of the purpose of the EIR and project alternatives. Section 15126.6 of the CEQA Guidelines states that an EIR shall describe a range of reasonable alternatives that would: 1) feasibly attain most of the basic objectives of the project, and 2) avoid or substantially lessen the significant effects of the proposed project. A Spring House Restoration Alternative that would also develop the Collier Club House and History Hill areas would result in the same impacts as the Spring House Rehabilitation Alternative and would not provide reasonable range of alternatives. Therefore, a combined Spring House restoration and reduced project alternative was addressed in the EIR in order to provide an alternative that would reduce all of the project's potentially significant impacts, and avoid the potential noise impact from the Collier Clubhouse area. The City Council will consider the proposed project and all proposed alternatives when making a decision on the project, and has the option of adopting a combination of alternatives. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. Refer to response to comment O9-2 above.
- O9-17** This comment is the opinion that the Spring House provides better support than the proposed Collier Club House for special events. This comment does not address the adequacy or accuracy of information provided in the Draft EIR. However, the Spring House was closed for occupancy in 1981, as described in Section 4.3.2.1 of the Draft EIR, Spring House, and does not currently provide an appropriate venue for events.



Collier Park Draft EIR
Page 3

09-18. In conclusion, the draft EIR is flawed and incomplete for the reasons listed above. The La Mesa General Plan calls for “improvement of historic sites, buildings, and districts” and “the preservation of historic and cultural sites.” The decision-makers in the City need to be firm in their support for historic properties in La Mesa – especially City-owned properties.

09-19. If the Collier Park Renovations Project moves forward in any form, the landmark Spring House and other historic features within Collier Park need to be protected and treated in compliance with *The Secretary of the Interior’s Standards*. Demolition of any of these features should be taken off the table and locked away for good in the “Bad Ideas” file.

Thank you for your attention to the important matter. Please feel free to contact me at 619.239.7888.

Sincerely,



P. David Marshall, AIA
La Mesa resident

09-18 This comment states that the Draft EIR is flawed for the reasons outlined in comments 09-3 through 09-17. Refer to the responses to these comments. No revisions to Draft EIR are required in response to these comments.

09-19 This comment expresses support for an alternative that would not demolish the Spring House. The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. In addition, as described in response to comment L1-2, the Draft EIR has been revised to include an additional alternative (Spring House Deterioration Prevention Alternative) that combines the proposed project with the No Project Alternative and Spring House Rehabilitation Alternative. Under this alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities would be pursued for restoration, rehabilitation or repurposing of the structure. All project alternatives will be considered by the City Council at the time of project approval. As discussed in response to comment 09-2, City staff is planning to recommend an alternative that would not demolish the Spring House.

COMMENTS

RESPONSES



P. O. Box 882, La Mesa, California 91944

La Mesa Historical Society

Museum: Rev. Henry A. McKinney House (1908)
8369 University Avenue
(619) 466-0197

Letter O10: La Mesa Historical Society

March 9, 2013

Chris Jacobs, Senior Planner
City of La Mesa
8130 Allison Avenue
La Mesa, CA 91942

Re: Comments to Collier Park Master Plan DEIR

We, the Board of Directors of the La Mesa Historical Society, respectively submit our comments to the Collier Park Master Plan Draft Environmental Impact Report (DEIR).

O10-1.

Firstly we must declare that we are NOT in support of the current preferred alternative to the Collier Park Master Plan. This alternative calls for the demolition of one of the City's most significant historical properties—the Collier Park Spring House, City Historical Landmark #3.

This alternative is unacceptable. It would result in unnecessary, unwarranted and unsubstantiated adverse effects to the environment through the permanent loss of one of this community's most significant and recognized historical resources.

O10-2.

We are in unanimous support of the preservation and adaptive use of the Collier Park Spring House and historical features as defined in the Spring House Rehabilitation Alternative found in chapter 8, section 8.2.2 of the DEIR.

O10-3.

The Board is in general concurrence with the intent of the four goals of the proposed Collier Park Master Plan as noted in chapter 1, section 1.3 on page 1-2, with the exception of objective #3. This objective is inadequate and misguided.

O10-4.

Collier Park, and its Spring House are listed City of La Mesa Historical Landmarks (A point of fact that is noticeably under-represented in the DEIR document).

O10-5.

In addition, the consultant's historical resources evaluation report (found in Appendix E) determined that this property is also eligible for the National and California Registers of Historic Places. Subsequently it is not sufficient to simply acknowledge the historical aspects of a listed, and potential eligible historical property.

O10-6.

We request that this project objective #3 be re-written as:
"Preserve and incorporate the historical features and elements of Collier Park including the Spring House into the Park's design, renovation and interpretive/educational facilities and programs."

O10-1

This comment refers to the proposed project as the City's "preferred alternative" and states that an alternative that involves demolition is unacceptable. Refer to response to comment O1-2. The City is considering several alternatives for the renovation of Collier Park; therefore, it is appropriate and necessary in compliance with CEQA that the EIR fully analyze the alternative with the greatest potential environmental impacts, and identify a range of reasonable alternatives that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen the significant effects of the proposed project. It is not the purpose of an EIR to select an alternative, nor does analysis in an EIR indicate that the project as proposed will be adopted by the City Council.

The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

O10-2

This comment expresses support for the Spring House Rehabilitation Alternative. As discussed in response comment O10-1, this alternative and all project alternatives will be considered by the City Council at the time of project approval.

O10-3

This comment states that Objective #3 for the proposed project, which is to acknowledge the historical aspects of Collier Park and the Spring House, is inadequate and misguided. The commenter does not present any specific reason why the objected is misguided or an example of an inadequacy in the objective. The proposed project objectives were established by the City of La

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Mesa to guide development of the proposed project. According to Section 15124 of the CEQA Guidelines, the objectives help the lead agency develop a reasonable range of alternatives and aid decision makers in preparing findings and a statement of overriding considerations, if necessary. The objectives are adequate for the purposes of CEQA.

- O10-4** This comment states that the designation of Collier Park as a City of La Mesa Historical Landmark is under-represented in the Draft EIR. Page 4-3 in Chapter 4.0 of the Draft EIR, Project Description, states that Resolution No. 15191 was adopted by the City Council on October 22, 1985, designating Collier Park and La Mesa Spring House as a local historical landmark. This information is also presented in Section 5.4, Cultural Resources. Therefore, the Draft EIR does not under-represent the project site's Historical Landmark designation.
- O10-5** This comment states that project Objective #3 to acknowledge the historical aspects of Collier Park and the Spring House is inadequate because Collier Park was determined to be eligible for federal and state listed as a historic resource. Refer to response to comment O10-3. The project objectives aided in the analysis of project alternatives and are adequate to aid in the preparation of findings. The CEQA guidelines do not require project objectives to address the historical significance of a site. No revision to the project objectives is required in response to this comment.
- O10-6** This comment suggests that Objective #3 be written to state that an objective of the project is the preserve and incorporate the historical features and elements of Collier Park. Refer to response to comment O10-5. The CEQA guidelines do not require project objectives to address the historical significance of a site. The objectives as written are adequate for the purposes of CEQA. No revision to the project objectives is required in response to this comment.

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P. O. Box 882, La Mesa, California 91944

La Mesa Historical Society

Museum: Rev. Henry A. McKinney House (1908)
8369 University Avenue
(619) 466-0197

O10-7. As the Society is a leading advocate of historic preservation and historical education in our City. We also submit this change to correspond with previous planning workshops for the Park Master Plan, as well as the City’s General Plan update.

In such we believe this objective should accurately reflect the community’s support for the preservation and re-use of the Spring House as documented at these workshops and public scoping meetings.

Considering the historical significance of the property and the consistent public support and input for preservation and adaptive use, we ask for response to the following questions:

O10-8. *Why was the most environmentally impacting alternative, the described “worst-case scenario” (page 1-2), chosen as the preferred alternative?*
Considering the required purpose of an EIR in the California Environmental Quality Act (CEQA) process is to identify the environmentally superior alternative, *why choose the most impacting alternative that requires the most mitigation measures, most significantly to cultural and historical resources?*

O10-9. *How was the statement referencing the “high cost of restoration” for the Spring House (page 1-4) established?* We can find no reference to cost estimates or studies by qualified historical architects, historical structural engineers or historic preservation specialists to back up this statement. *Do any such studies currently exist?*

O10-10. *How could the restoration/rehabilitation of the Spring House and other historic features be considered to have higher costs than the costs of mitigating the demolition of a listed historical resource, and the construction of a new “interpretive center structure?” Does such cost analysis exist?*

O10-11. *Considering that no project funding exists for implementation of this project’s proposed improvements, it is not presumptive to assume that historic preservation is unaffordable if funds have to be raised for the entire project?*

O10-12. In conclusion we reiterate our support for the preservation and restoration of the Spring House as a key component of the Collier Park Master Plan.

Sincerely,

Aaron Landau, President
La Mesa Historical Society

O10-7 This comment reiterates support for the suggested objectives, as the commenter feels it would accurately reflect the community’s support for preservation and reuse of the Spring House. Refer to response to comment O10-5. The CEQA guidelines do not require project objectives to address the historical significance of a site. The objectives as written are adequate for the purposes of CEQA. Additionally, refer to response to comment O10-1. Based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt a project that would not result in demolition of the Spring House.

O10-8 This comment requests an explanation regarding the proposed project being selected as the preferred alternative. Refer to response to comment O1-2. It is not the purpose of an EIR to select an alternative and the EIR does not indicate a preferred alternative. The City is considering several alternatives for the renovation of Collier Park; therefore, it is appropriate and necessary in compliance with CEQA that the EIR fully analyze the alternative with the greatest potential environmental impacts.

O10-9 This comment requests documentation of the statement in Chapter 8.0 of the EIR, Alternatives, that the Spring House Restoration Alternative may not be economically feasible given the high cost of restoration. Refer to response to comment O9-8. A detailed cost analysis is not provided in the Draft EIR because it is not the appropriate location for this type of analysis. A preliminary Review and Analysis of Development Alternatives was prepared for the Collier Park renovations by Keyser Marston Associates in 2011. This document is listed as a reference in Chapter 9.0 of the Draft EIR, References, and is available for review at the City of La Mesa Community Development Department, located at 8130 Alison Avenue in La Mesa. Hours of operations are Monday through Friday, 7:30 a.m. to 5:30 p.m. (La Mesa City Hall is closed every other Friday). The analysis determined that the outdoor interpretive center alternative for the Spring House area would cost approximately \$380,000, while rehabilitation of the Spring House structure would cost approximately \$913,000. This analysis was based on standard construction practices and did not take into account implementation of the Secretary of the Interior’s Standards for Rehabilitation. It is anticipated that compliance with the Secretary of the Interior’s Standards would result in additional costs.

O10-10 This comment questions the cost of mitigation and construction of an interpretive center compared to rehabilitation of the Spring House. Refer to response to comment O10-9. The Review and Analysis of Development Alternatives prepared for the Collier Park renovations determined that the outdoor interpretive center alternative for the Spring House area would cost

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approximately \$380,000, while rehabilitation of the Spring House structure would cost approximately \$913,000.

- O10-11** This comment states that it is presumptive to assume that historic preservation is unaffordable because funds have to be raised for the entire project. The Draft EIR correctly states that restoration of the Spring House would be more costly than the proposed outdoor interpretive center. However, it does not determine that historic preservation would be unaffordable, and does not determine whether any alternative is infeasible. As rehabilitation costs more than construction of an interpretive center, it is reasonable to assume that additional funding sources would need to be obtained for a rehabilitation alternative.
- O10-12** This comment reiterates support for an alternative that would not demolish the Spring House. The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. All project alternatives will be considered by the City Council at the time of project approval. As discussed in response to comment O10-1, City staff is planning to recommend that the City Council adopt a project that would not result in the demolition of the Spring House.

COMMENTS

RESPONSES

Letter O11: Lemon Grove Historical Society



Lemon Grove Historical Society

P.O. Box 624 • Lemon Grove, CA 91946

Tel: (619) 460-4353 • Fax (619) 462-8266

www.lemongrovehistoricalsociety.org • lghistorical@gmail.com

February 14, 2013

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

Re: Collier Spring House

Dear Mr. Jacobs,

O11-1. We write in support of the preservation and adaptive reuse of the Collier Spring House as defined in chapter 8, section 8.2.2 of the Environmental Impact Report (EIR) for the Collier Park improvements.

O11-2. The Spring House is one of La Mesa’s leading historic sites, for it embodies the City’s pioneer past (agriculture, livestock, water, the Allison family), early industrial development (Collier Bottling Works), and early recreational development (Col. Charles Collier donated the five-acre parkland).

O11-3. The “demolish and interpret” alternative in the EIR would merely tell people what is not there any more--when the City could have the real structure and its stirring history evident for visitors to Collier Park, which is named for its benefactor. The Spring House could be a superb setting for special events--and the latter are a focus of the improvement project.

O11-4. In the wake of the City’s 2012 centennial celebration, destroying an already-landmarked historic site in the 101st year infers that the centennial held only fleeting, transitory meaning. A centennial is a watershed moment for any community and certainly for La Mesa with its track record of saving historic structures for the benefit of its people, neighborhoods and heritage. With such a fine preservation history, why would the City demolish a unique historical resource that can help to tell the civic story to present and future generations?

Moreover, in the run-up to the 2015 centennial celebration of Balboa Park, destroying a building created by Col. Charles Collier, whose leadership of the 1915 Panama California Exposition is well documented, defies all reason. Col. Collier chose the site of the exposition, the architectural style, the consulting architect and the Southwest theme. He is linked to the founding of several Balboa Park museums.

O11-5. Col. Collier’s leadership across San Diego County is the backstory to the Spring House. In other words, while the building is unique to La Mesa, it is significant beyond the City’s borders. We in the Lemon Grove Historical Society feel keenly the tie to the Spring House (and to other historical resources in La Mesa), for the origins of Lemon Grove and La Mesa are linked. We view La Mesa as a torch bearer for preservation.

O11-1 This comment expresses support for the Spring House Rehabilitation Alternative. This alternative and all project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives addressed in the EIR. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project’s potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

O11-2 This comment provides information about the Spring House. It does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.

O11-3 This comment reiterates support for the Spring House Rehabilitation Alternative. Refer to response to comment O11-1.

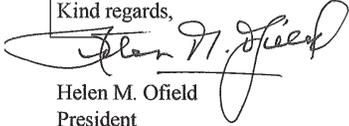
O11-4 This comment reiterates support for an alternative that would not demolish the Spring House. The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. As stated in response to comment O11-1, all project alternatives will be considered by the City Council at the time of project approval.

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O11-6.

We urge La Mesa to adopt the Spring House Rehabilitation Alternative in the certain knowledge that it will a) enhance an already-distinguished record of preservation and, b) provide Collier Park and the City with a significant, historic building for long term use.

Kind regards,



Helen M. Ofield
President

cc: LGHS Executive Board
La Mesa Historical Society
La Mesa Historic Preservation Commission

RESPONSES

- O11-5** This comment reiterates support for rehabilitation of the Spring House because the City of Lemon Grove considers the Spring House to be of historical significance beyond the boundaries of La Mesa due to connections to Balboa Park and Lemon Grove. The Draft EIR concurs in Chapter 4.0, Project Description, and Section 5.4, Cultural Resources, that the Spring House is a significant historic resource. As stated in response to comment O11-4. The Draft EIR includes two alternatives which would not demolish the Spring House, and has been revised to include a third alternative (Spring House Deterioration Prevention Alternative) that would not demolish the Spring House (see response to comment L1-2). All project alternatives will be considered by the City Council at the time of project approval.
- O11-6** This comment reiterates support for the Spring House Rehabilitation Alternative. Refer to response to comment O11-1.

COMMENTS

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March 4, 2012

Letter O12: Dexter Levy

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, California 91942

Re: DRAFT EIR for Collier Park Renovation Project

Dear Mr. Jacobs,

As you know, In 2007 **ARCITECTS**, Bundy & Thompson/Garbini & Garbini were retained to Prepare a Masterplan for Collier Park, through the development of a comprehensive & interactive outreach program using a series of interviews, surveys and workshops. Approximately 20 Citizens were selected to participate in these sessions of which I was one.

O12-1. The workshops were scheduled for Feb & April 2008, in order to collect information & opinions to assist with the developing the Primary Masterplaning using these ideas & discussions.

As a direct result of this process I was asked to meet with Dick Bundy (Bundy & Thompson) at 2:00 pm on Jan 10, 2008 at Collier Park, at which time we were given very Limited access to the Spring House and observed first hand its state of repair.

O12-2. Reviewing the current Draft EIR, it indicates that it contains preferences that that require "Total Demolition" of the Spring House. You can rest assured that this type action was never an option that warranted any serious discussion at any of the workshops, as a matter of fact, it was just the opposite the real opinion by the team was to protect the Spring House!

O11-3. To consider any kind of destruction of the Spring House is totally unacceptable, especially when it truly represents "**THE WATER THAT STARTED IT ALL**". Such action flies directly in the opposite direction of the Citizens Team. When you consider all the countless hours that were spent in trying to come up with a Master Plan for Collier Park, this proposed action is a total disregard for the recommendations & true Heritage of La Mesa and to those who worked so hard on the Master Plan. Preservation of the Spring House has got to be one of primary objectives when it comes to Collier Park.

O12-4. The EIR must be revised to show that the preserving of the Spring House is a key issue when it comes to the Renovation of Collier Park "**IT'S our HERITAGE**"

Yours truly,
 Dexter Levy
 La Mesa, Ca. 91942

O12-1 This comment provides background on the commenter and the development of the proposed project. It does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.

O12-2 This comment states that the Draft EIR indicates a preferred alternative that requires total demolition of the Spring House. Refer to response to comment O1-2 for a detailed response to this comment. It is not the purpose of an EIR to select an alternative and the EIR does not indicate a preferred alternative. Additionally, the statement that the project proposes total demolition is incorrect. The existing Spring House stone rubble wall base and cistern would not be demolished.

O12-3 This comment expresses support for an alternative that would not demolish the Spring House. The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. In addition, as described in response to comment L1-2, the Draft EIR has been revised to include an additional alternative (Spring House Deterioration Prevention Alternative) that combines the proposed project with the No Project Alternative and Spring House Rehabilitation Alternative. Under this alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure.

All project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as

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proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

- O12-4** This comment requests that the Draft EIR be revised to show that preserving the Spring House is a key issue. This request is based on the commenter's statement regarding a preferred alternative and total demolition in comment O12-2. As discussed in the response to this comment, the EIR does not select a preferred alternative and the project does not propose total demolition. The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. All project alternatives will be considered by the City Council at the time of project approval, as discussed in response to comment O12-3. No revision to the EIR is required in response to this comment.

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San Diego, CA 92103
 March 7, 2013

Letter O13: Alfred J. Mazur

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

RE: Collier Park Master Plan DEIR

Dear Planner Jacobs,

O13-1.

It has come to my attention that the Collier Park Renovations Project includes the demolition of the historic Spring House. Section 4.3.1.2 of the Collier Park Renovations Project EIR proposes that “the stone walls around the base of the building, the cistern, and related accoutrements be maintained and preserved to serve as an interpretive center.” Although this seems to indicate portions of the building will be retained, Fig. 4.2 of the EIR, shows little resemblance to the existing Spring House. The proposed alteration is effectively demolition.

O13-2.

As stated in Section 4.3.1.2, Developer David C. Collier constructed the Spring House, circa 1907, on the present Collier Park site as a bottling plant for spring water. In 1910, Collier offered this property, including the Spring House, to the community if they incorporated, which they did in 1912. In 1915, the City of La Mesa purchased a 14-acre portion of land, including the Spring House, and Collier Park was developed shortly thereafter.

O13-3.

La Mesa has just celebrated its Centennial in 2012. Collier Park and the Spring House represent the start and heart of La Mesa. The Spring House must not be so altered to bear no resemblance to the original structure, must not be demolished.

Section 8.2.2 of the DEIR, includes an alternative that would result in the preservation and reuse of the Spring House. This Spring House Rehabilitation alternative would eliminate the significant impacts under CEQA and the un-mitigable, irreversible demolition of this listed historical property.

As a California architect, I urge you to reject the demolition of the Spring House and include the preservation of the Spring House as described in Section 8.2.2 of the DEIR.

Sincerely,



Alfred J. Mazur AIA

O13-1 This comment states that Draft EIR Figure 4-2 does not match the description of the project in Section 4.3.1.2 of the Draft EIR. Figure 4-2 depicts use of the existing foundation and stone wall structure as part of a new outdoor interpretive center. As stated in the Project Description, the project would include a new concrete floor finish, stabilization of the remaining concrete and stone wall structure, and installation of interpretive exhibits. The Project Description acknowledges that the project would involve partial demolition of the Spring House, but would retain and incorporate the stone wall structure into the interpretive center, as shown in Figure 4-2. No revisions to the Draft EIR are required in response to this comment.

O13-2 This comment provides information about the history of the Spring House. It does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.

O13-3 This comment expresses support for the Spring House Rehabilitation Alternative. This alternative and all project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives addressed in the EIR. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project’s potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

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Letter O14: Anthony D. McIvor

La Mesa, CA 91941

1 March 2013

Mr. Chris Jacobs
 Senior Planner, Community Development Dept.
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

Subj: Collier Park Master Plan EIR Spring House Rehabilitation Alternative

Dear Mr. Jacobs:

O14-1.

I write to express our strong sentiment in favor of preservation and rehabilitation of the Spring House in Collier Park. Demolition of that historic landmark is a terrible and terribly short-sighted option. The Rehabilitation Alternative (cited in Section 8.2.2 of the DEIR) must be adopted for the Collier Park Master Plan.

As a child, in the 1960s, my buddies and I rode our bicycles through and around Collier Park many, many times. To our shame, we were utterly unaware of the significance of the Spring House, nor of its role in early La Mesa. In our defense, there was nothing at the site to enlighten us – or anyone else – in that regard. The years passed, the Spring House stayed shut and no one seemed to know what to do about that.

O14-2.

Today, as a trained historian, I often pass by Collier Park and lament that while the Spring House endures, it has yet to fulfill its potential as an historic site of exceptional educational value and cultural importance to the community. With a long-overdue refurbishing of the Park now on the horizon, can we not do better than simply tearing down the iconic building at its heart?

Collier Park’s Spring House could become an ideal venue for learning about the significance of water in an arid environment, the geographic and economic foundations of municipal development and the ceaseless process of building a livable community.

O14-3.

Considering the building’s inherent character, why does the current draft plan not make the Spring House *the first choice* as a location for an interpretative center?

O14-4.

La Mesa has people and organizations with the know-how to make the Spring House a treasured civic asset. The Master Plan developed by the City should open the door for them – not close it forever.

O14-1

This comment expresses support for the Spring House Rehabilitation Alternative. This alternative and all project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives addressed in the EIR. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project’s potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

O14-2

This comment describes the commenter’s personal experience with Collier Park and reiterates support for the Spring House Rehabilitation Alternative. Refer to response to comment O14-1.

O14-3

This comment implies that the proposed project was selected as a preferred alternative, as the Spring House Rehabilitation Alternative should be selected as the preferred alternative instead. Refer to response to comment O1-2. It is not the purpose of an EIR to select an alternative and the EIR does not indicate a preferred alternative. As discussed in response to comment O14-1, all project alternatives will be considered by the City Council at the time of project approval.

O14-4

This comment reiterates support for the Spring House Rehabilitation Alternative. Refer to response to comment O14-1.

COMMENTS

RESPONSES

Please share this letter and/or its sentiments with your colleagues and the City Council as an indication of our family's firm support for the Spring House Rehabilitation Alternative.

Sincerely,



Dr. Anthony D. Mc Ivor

cc: Art Madrid, Mayor
Dave Witt, City Manager
Yvonne Garrett, Asst. City Manager
Bill Chopyk, Director Community Development

COMMENTS

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Letter O15: Jerelyn A. Morgan

To: Chris Jacobs, Senior Planner
City of La Mesa
8130 Allison Avenue, La Mesa, CA 911942
From: Jerelyn A. Morgan
1844 Hacienda Drive, El Cajon, CA 92020
Date: March 9, 2013
RE: COLLIER PARK RENOVATION

Dear Chris Jacobs,

It is exciting to me to know that plans are in the offing to improve Collier Park in our La Mesa. That park has lots of memories for me and my family.

My family has a long history in the San Diego area, having come from Europe in the 1850s and settling in Sacramento, then to San Diego in the 1880s. My grandfather, Carl H. Heilbron, worked with Charles Collier as one of the vice presidents to plan the 1915 Exposition in Balboa Park. "Charlie" was a close friend of the family. "Uncle Charlie" signed an 8 X 10 photo of himself to my mother Katherine Heilbron when she was a child. He wrote: "To my 'onliest' sweetheart." When there is a mini-museum at Collier Park someday, I'd be glad to donate that photograph.

O15-1.

Altogether I have lived in La Mesa about 51 of my 74 years. Although we moved just over the line to Fletcher Hills (El Cajon) recently, La Mesa will always be my hometown. After my parents bought a small orange orchard across Spring Street from Adam's turkey ranch, my Dad built a house there in 1948. Dad also taught at Grossmont High School for 32 years. I graduated from La Mesa Junior High (when it was on Orange Street) and from Helix High School in 1955, as part of the first class to attend Helix all four years. In fact, my husband of 52 years and I met at Helix High.

My brother and I have many memories of running and playing at Collier Park, including hitting and chasing after tennis balls on the tennis court. My memory also includes the fact that a Girl Scout troop met for years in the wonderful old Spring House. Dad would come down to Collier Park regularly to line up with other local residents for the spring water that was available. In later years our extended family continued to picnic there. I recall clearly one I especially enjoyed in 1969, when my husband came to the family picnic late and announced that he had just bought our first home.

O15-2.

Thanks to the city of La Mesa for planning to make Collier Park more attractive and useful to the folks in La Mesa and beyond. But please include the renovation of the century old Spring House as a priority. Collier Park wouldn't be Collier Park without the Spring House. We really need to preserve its long time importance in the history of our hometown.

Let's hear it for Collier Park ... past, present and future!

Sincerely,



Jerelyn A. Morgan

O15-1 This comment expresses support for the proposed project. No further response is necessary.

O15-2 This comment expresses support for an alternative that would not demolish the Spring House. The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. In addition, as described in response to comment L1-2, the Draft EIR has been revised to include an additional alternative (Spring House Deterioration Prevention Alternative) that combines the proposed project with the No Project Alternative and Spring House Rehabilitation Alternative. Under this alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure.

All project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity.

The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

COMMENTS

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NEIGHBORHOOD HISTORIC PRESERVATION COALITION

Advocating for measures that preserve our established neighborhoods and historic resources for future generations

Chris Jacobs, Senior Planner
City of La Mesa
8130 Allison Avenue
La Mesa, CA 91942

February 5, 2013

Dear Mr. Jacobs,

The NHPC strongly advocates for appropriate treatment of La Mesa Historical Landmark # 3 and to make certain that the Spring House Rehabilitation Alternative becomes part of the preferred plan for the final Collier Park Master Plan.

O16-1.

Wise and responsible management of historical resources by any municipality translates into better quality of community character and quality of life for its residents. We urge proper application of Secretary of Interior Standards for the Spring House. The Spring House Rehabilitation Alternative would certainly comply successfully.

Thank you for your consideration,



Dan Soderberg, Chair NHPC

619-282-5003

Letter O16: Neighborhood Historic Preservation Coalition

O16-1 This comment expresses support for the Spring House Rehabilitation Alternative. This alternative and all project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives addressed in the EIR. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative. It should be noted that the Draft EIR does not select a preferred alternative, as indicated in this comment. Refer to response O1-2.

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Letter O17: James Newland

March 11, 2013

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

Subject: Comments to Collier Park Master Plan DEIR

- | | | | |
|----------------------|--|---------------------|---|
| <p>O17-1.</p> | <p>I have been a resident of La Mesa on and off since 1985. La Mesa has been my family’s home for the last ten years.</p> <p>I am a professional historian and have over twenty years experience in historical resources management. The last seventeen years of this professional experience has been as a historian, environmental planner, manager and historic preservation project manager for California Department of Parks and Recreation.</p> <p>In addition I have undertaken extensive research into the history of La Mesa and the surrounding region. My volunteer and community work included an appointed position on the City of La Mesa Centennial Committee (2009-2013), and I am currently the Vice President of the La Mesa Historical Society.</p> <p>It is with this professional expertise and local community service background that I present my letter in response to the Collier Park Master Plan Draft Environmental Impact Report (DEIR) as part of the project’s requirement to comply with the guidelines and procedures of the California Environmental Quality Act (CEQA).</p> | <p>O17-1</p> | <p>This comment introduces the commenter. It does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.</p> |
| <p>O17-2.</p> | <p>I will begin with the statement that I am NOT in support of the current preferred alternative to the Collier Park Master Plan.</p> <p>The plan’s current “preferred alternative,” as written in the Draft EIR, would do so at the cost of the complete demolition to the historic 1907 Collier Spring House.</p> | <p>O17-2</p> | <p>This comment states that the Draft EIR indicates a preferred alternative that requires total demolition of the Spring House. Refer to response to comment O1-2 for a detailed response to this comment. It is not the purpose of an EIR to select an alternative and the EIR does not indicate a preferred alternative. Additionally, the statement that the project proposes total demolition is incorrect. The existing Spring House stone rubble wall base and cistern would not be demolished.</p> |
| <p>O17-3.</p> | <p>The Spring House is one of the few historical buildings in La Mesa that has been determined to be eligible for the California and National Registers of Historic Places as well as already being a listed City Landmark. (This eligibility is confirmed in the DEIR’s Historical Resources Evaluation Report—Appendix E).</p> | <p>O17-3</p> | <p>This comment provides information about the Spring House that is available in the Historic Resources Evaluation Report (Draft EIR Appendix E), and Section 5.4 of the Draft EIR, Cultural Resources. No further response is necessary.</p> |
| <p>O17-4.</p> | <p>In CEQA, such an adverse effect to a listed, or eligible for listing, historical resource, is a significant adverse impact to the environment. This is because demolition is an irreversible adverse action for a historical property.</p> | <p>O17-4</p> | <p>This comment states that the proposed project’s impacts to the Spring House structure should be considered significant and unavoidable because the project would result in an irreversible impact to a historical property. Refer to response to comment O6-4 for a detailed response to this comment. CEQA does not require historical resources to be avoided or preserved in order to be considered a less than significant impact.</p> |

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- O17-5.** The Collier Park Master Plan DEIR identifies “mitigation measures” for this proposed demolition such as recordation of the historical Spring House with photos and drawings, supporting alternative restoration projects in the City, and the construction of a new interpretive exhibit structure (page 1-11).
 These mitigation efforts however cannot truly justify or replace the irreversible loss of the original historical resource. As such I thoroughly disagree that any such mitigations can minimize the proposed significant impacts to Collier Park’s historical properties to “less than significant.”
- O17-6.** In CEQA, when such mitigations to historical resources are proposed, they are only justified when the treatments to the resource would be consistent with the *Secretary of the Interior’s Standards for the Treatment of Historic Properties* and subsequently result in the property retaining the components of its historical listing or eligibility. I can confirm that demolition would not in any way result in a property retaining its listing or eligibility.
 Therefore the preferred alternative, with the demolition of the historic Spring House, regardless of the proposed mitigation measures, results in a substantial adverse effect to this recognized historical resource.
- O17-7.** In order for the City to propose such an un-mitigable significant impact would be to adopt a justified Statement of Overriding Considerations (SOC).
 However, the DEIR presents no such Statement of Overriding Considerations or substantial evidence or arguments to support such a SOC. Additionally there is no reasoning (overriding considerations) as to why non-impacting treatments such as the restoration or rehabilitation of the Spring House couldn’t be undertaken—a requirement in order to justify such a SOC.
- O17-8.** **The Spring House Rehabilitation Alternative**
 The Collier Park Master Plan DEIR, as required by CEQA, does provide additional alternatives that consider less environmentally impacting actions to the draft plan’s current preferred alternative scope.
- O17-9.** The Spring House Rehabilitation Alternative, found in Section 8.2.2 of the DEIR, is an alternative that would result in the preservation and reuse of the Spring House. This Spring House Rehabilitation alternative would eliminate the significant impacts under CEQA and the un-mitigable, irreversible demolition of this listed historical property.
 The Rehabilitation Alternative, with the restored and/or rehabilitated Spring House clearly provides a better match for the uses called out to replace it in the current proposed plan.

- O17-5** This comment reiterates the opinion that mitigation measures Cul-1 and Cul-2 do no mitigate the proposed project’s impact to historical resources to a less than significant level. Refer to response to comment O6-4 for a detailed response regarding the City’s significance determination.
- O17-6** This comment incorrectly states that unless a historical resource is treated consistent with the Secretary of the Interior’s Standards for the Treatment of Historical Properties, an impact is significant and unavoidable. Although Section 15064.5(b)(3) of the CEQA Guidelines states that compliance with the Secretary of the Interior’s Standards for the Treatment of Historical Properties would generally reduce impacts to a less than significant level, it does not require implementation of these standards in order to reduce impacts to less than significant. Additionally, refer to response to comment O6-4. Section 15064.5(b)(4) of the CEQA Guidelines gives lead agencies the authority to identify mitigation measures for cultural resources to reduce impacts to a less than significant level. The CEQA guidelines do not prescribe mitigation.
- O17-7** This comment indicates that the Draft EIR is inadequate because it does not include a statement of overriding considerations. As stated in Section 15093(b) of the CEQA Guidelines, a statement of overriding considerations is required when the lead agency approves a project which will result in the occurrence of significant effects which are identified in the Final EIR but are not avoided or substantially lessened such that they would result in unavoidable environmental impacts. The City has determined that all of the potentially significant environmental impacts identified for the proposed project are capable of being mitigated to below a level of significance. Therefore, a statement of overriding considerations is not applicable to the proposed project. Additionally, a statement of overriding considerations, if required, is not typically circulated during the public review period with the Draft EIR. As stated in Section 15093(c) of the CEQA Guidelines, the statement of overriding considerations should be included in the record of project approval and mentioned in the notice of determination following project approval and certification of the Final EIR.
- O17-8** This comment correctly states that the Draft EIR provides project alternatives that would result in reduced environmental impacts compared to the proposed project, as required by CEQA. No further response is necessary.
- O17-9** This comment expresses support for the Spring House Rehabilitation Alternative. This alternative and all project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives addressed in the

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O17-10. The rehabilitated Spring House could be used for the proposed interpretive facility to help educate Park visitors to the site and community’s history, as well as providing support space for the Park’s proposed new amphitheater and group event spaces to be used for gatherings, weddings, etc.

The newly proposed interpretive structure (shown in Figure 4-2) cannot fulfill all these plan goals.

O17-11. Therefore the Spring House alternative reduces the mitigation costs associated with its demolition, including building a new outdoor interpretive structure, the potential for legal challenge to protect the historic building from the current plan’s demolition, and better compliments the Master Plan’s goals and objectives for the future benefit of the Park.

O17-12. In addition, such elimination of significant impacts and adverse effects would be key if any federal funding were obtained. If a Federal nexus is made for this project, either through funding or permitting, the project may be subject to the additional provisions and reviews of the National Environmental Policy Act(NEPA) and the Section 106 process of the National Historic Preservation Act.

Section 106 review is undertaken through the State Office of Historic Preservation has much stricter procedural guidelines for the protection of eligible or listed historical resources.

O17-13. As such I strongly support the preservation and adaptive use of the Collier Park Spring House and historical features as defined in the Spring House Rehabilitation Alternative found in chapter 8, section 8.2.2 of the DEIR.

O17-14. **Specific Comments and Questions**
The following are my specific comments and questions to the DEIR.

Park Objectives

O17-15. I am in general concurrence with three of the four objectives of the proposed Collier Park Master Plan as noted in chapter 1, section 1.3 on page 1-2. Objective #3 however does not provide appropriate protection for, or implements, the community’s interests. “Acknowledgement” of the historical aspects is not sufficient direction and infers insignificance of the Park’s historical significance and resources.

As such I request that this project objective #3 be re-written as:

O17-16. *“Preserve and incorporate the historical features and elements of Collier Park including the Spring House into the Park’s design, renovation and interpretive/ educational facilities and programs.”*

This rewrite will also more closely reflect the public opinions and input presented at the Plan workshops that I attended and participated in several years ago.

EIR. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project’s potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

O17-10 This comment reiterates support for the Spring House Rehabilitation Alternative. Refer to response to comment O17-9.

O17-11 This comment states that the Spring House Rehabilitation Alternative would result in reduced costs compared to the proposed project, including construction of the interpretive center. This statement is incorrect. Refer to response to comment O9-8. A preliminary Review and Analysis of Development Alternatives was prepared for the Collier Park renovations by Keyser Marston Associates in 2011. The analysis determined that the outdoor interpretive center alternative for the Spring House area would cost approximately \$380,000, while rehabilitation of the Spring House structure would cost approximately \$913,000. This analysis was based on standard construction practices and did not take into account implementation of the Secretary of the Interior’s Standards for Rehabilitation. It is anticipated that compliance with the Secretary of the Interior’s Standards would result in additional costs. This comment also expresses the commenter’s opinion that the Spring House Rehabilitation Alternative would reduce the potential for legal challenge to protect the Spring House, and better compliments the Collier Park Master Plan goals. As stated in response to comment O17-9,

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based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt a project that would not demolish the Spring House. However, the project as proposed would meet the goals of the Collier Park Master Plan. Preservation of the Spring House was not included as a goal of the Master Plan.

- O17-12** This comment states that a Section 106 review of historical resources would be required if federal funding would be obtained for the proposed project. Refer to response to comment F1-1. An Environmental Assessment in compliance with NEPA is currently being prepared for the proposed project, including Section 106 review.
- O17-13** This comment reiterates support for the Spring House Rehabilitation Alternative. Refer to response to comment O17-9.
- O17-14** This comment introduces the comments that addressed in responses to comment O1-15 through O1-30. Refer to the responses to these comments.
- O17-15** This comment expresses that the commenter disagrees with Objective #3 for the proposed project because acknowledgement of the sites historical aspects does not provide sufficient direction and infers insignificance of the resources. Refer to response to comment O10-3. The project objectives aided in the analysis of project alternatives and are adequate to aid in the preparation of findings, as required by CEQA. The CEQA guidelines do not require project objectives to address the historical significance of a site. The historical significance of the project site is highlighted in Chapter 4.0 of the Draft EIR, Project Description, and evaluated in Section 5.4, Cultural Resources. No revision to the project objectives is required in response to this comment.
- O17-16** This comment requests a revision to Objective #3 to include preservation and incorporation of historical features and element. Refer to response to comment O17-15. The project objectives are adequate for the purposes of CEQA and are not required to address the historical significance of a site. No revision to the project objectives is required in response to this comment.

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O17-17.	<p><i>How many/percentage of the public input received during the previously held planning workshops and scoping meetings, requested preservation of the historic resources within Collier Park, including the Spring House? And how many called for demolition of these features?</i></p>	<p>O17-17 This comment requests information regarding public opinion expressed at previously held planning workshops and scoping meetings. It does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.</p>
O17-18.	<p><u>Worst-Case Scenario Alternative</u> Considering the required purpose of an EIR in the California Environmental Quality Act (CEQA) process being to identify the environmentally superior alternative,</p>	<p>O17-18 This comment states that the Draft EIR indicates a preferred alternative. Refer to response to comment O1-2. It is not the purpose of an EIR to select an alternative and the EIR does not indicate a preferred alternative.</p>
O17-18.	<p><i>Why was the “worse-case scenario” (page 1-2), the most environmentally impacting alternative that requires the most mitigation measures, most significantly to cultural and historical resources, chosen as the preferred alternative?</i></p>	<p>O17-19 This comment requests documentation of the statement in Chapter 8.0 of the EIR, Alternatives, that the Spring House Restoration Alternative may not be economically feasible given the high cost of restoration. Refer to response to comment O9-8. A preliminary Review and Analysis of Development Alternatives was prepared for the Collier Park renovations by Keyser Marston Associates in 2011. This document is listed as a reference in Chapter 9.0 of the Draft EIR, References, and is available for review at the City of La Mesa Community Development Department. The analysis determined that the outdoor interpretive center alternative for the Spring House area would cost approximately \$380,000, while rehabilitation of the Spring House structure would cost approximately \$913,000. This analysis was based on standard construction practices and did not take into account implementation of the Secretary of the Interior’s Standards for Rehabilitation. It is anticipated that compliance with the Secretary of the Interior’s Standards would result in additional costs. Based on this information, the Draft EIR correctly states that restoration of the Spring House would be more costly than the proposed outdoor interpretive center.</p>
O17-19.	<p><u>Cost Analysis</u> <i>How was the statement referencing the “high cost of restoration” for the Spring House (page 1-4) established?</i></p>	
O17-19.	<p>I can find no reference to cost estimates or studies by qualified historical architects, historical structural engineers or historic preservation specialists to back up this statement.</p> <p><i>Do any such cost analysis studies currently exist or were they undertaken?</i></p>	
O17-20.	<p><i>How could the restoration/rehabilitation of the Spring House and other historic features be considered higher costs than; the costs of mitigating the demolition (including a mitigation measure calling for “financial contribution in support of a related preservation or restoration project in the City of La Mesa) and the construction of a new “interpretive center structure?” Does such cost analysis exist?</i></p>	<p>O17-20 This comment questions the cost of mitigation and construction of an interpretive center compared to rehabilitation of the Spring House. Refer to response to comment O9-8. The Review and Analysis of Development Alternatives prepared for the Collier Park renovations determined that the outdoor interpretive center alternative for the Spring House area would cost approximately \$380,000, while rehabilitation of the Spring House structure would cost approximately \$913,000.</p>
O17-21.	<p><i>If the funds for the above mentioned mitigation measure exists, why would those funds not be used to study or restore the Spring House and other listed historic features of the property?</i></p>	
O17-22.	<p><u>Demolition Mitigation</u> As noted in the DEIR, the demolition of the Spring House would cause it to lose its historical listing, and its eligibility to the California and National Registers,</p>	
O17-23.	<p><i>How could such an impact be justified as “less than significant” after mitigation?</i></p> <p><i>Why was a Statement of Overriding Conditions not prepared for such an un-mitigable impact as required under CEQA?</i></p>	<p>O17-21 This comment expresses the opinion that if funds exist for proposed mitigation measure Cul-2, the funds should be used to restore the Spring House. Funding to implement renovations at Collier Park would require obtaining funding from a variety of sources, no matter which alternative is ultimately selected. As rehabilitation costs more than construction of an interpretive center, it is reasonable to assume that additional funding sources</p>

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O17-24.	<p><u>Interpretive Structure</u> Does the rendering of the Interpretive Structure (Figure 4-2) match the description of the mitigation measure to integrate the remaining foundations of a demolished Spring House? It appears to be a completely new structure.</p>	<p>would need to be obtained for a rehabilitation alternative. Refer to response to comment O10-11. The Draft EIR does not determine that historic preservation would be unaffordable, and does not determine whether any alternative is infeasible.</p>
O17-25.	<p><u>Spring House Assessment</u> The DEIR has descriptive statements of the Spring House as being in “disrepair,” “dilapidated,” showing “advanced deterioration,” and “seismic hazards.” What studies/assessments were conducted to make these statements? Was a historical structural engineer, historical architect or preservation specialist involved in these determinations?</p>	<p>O17-22 This comment reiterates the commenter’s opinion that demolition of the Spring House should be considered a significant and unavoidable impact. Refer to response to comment O6-4. O17-23 This comment reiterates that a statement of overriding considerations should have been prepared for the proposed project. Refer to response to comment O17-7.</p>
O17-26.	<p>Has an initial structural condition assessment been completed for the Spring House? Such a technical report, completed by preservation professionals, would be able to identify any necessary measures needed to properly assess and recommend any immediate public safety and stabilization issues.</p>	<p>O17-24 This comment questions whether Figure 4-2 matches the description of the proposed outdoor interpretive center, but does not provide a specific example of an inconsistency. Refer to response to comment O13-1. Figure 4-2 is a conceptual drawing and is consistent with the project description.</p>
O17-27.	<p><u>Has a Historical Structures Report been completed for the Spring House?</u> This is the standard technical report that would provide for a full historical and architectural assessment of the building. It would help identify all contributing or missing historical features of the structure and recommendations for undertaking the most appropriate preservation and re-use treatments.</p>	<p>O17-25 This comment requests documentation for statements in the Draft EIR regarding the existing condition of the Spring House. An evaluation of the existing conditions of the Spring House was prepared as part of Historic Resources Evaluation Report prepared by ASM Affiliates, Inc. (2012). The report is provided as Appendix E of this EIR, as stated on page 5.4-1 of the Draft EIR. Additionally, the City determined the Spring House to be structurally unsafe in 1981 due to its deteriorated condition, as stated in page 4-3 of the Draft EIR.</p>
O17-28.	<p><u>Restoration Alternative</u> The Spring House Restoration Alternative provides the most protection for the historical properties in the park. However, it is rejected as not fulfilling 2 of the 4 project objectives, most notably for not allowing the construction of the new Collier Park Club House. Why are these apparently mutually exclusive proposals (Restoring Spring House and building a new Club House) linked? Couldn’t they both be implemented without affecting the other?</p>	<p>O17-26 This comment questions whether an initial structural assessment has been completed for the Spring House. Refer to response to comment O17-25. A Historic Resources Evaluation Report has been prepared and is provided as Appendix E of the EIR.</p>
O17-29.	<p><u>Preservation Review Precedence</u> The City requires all owners of City-designated historical landmarks to bring proposed improvement projects to the City’s Historic Preservation Commission (HPC) for review and approval. Has this project been presented to the City of La Mesa HPC for review? What was their determination? If not, how could the City justify requiring private owners of listed historical properties to follow these review determinations if they do not require their own Departments to follow these procedures?</p>	<p>O17-27 This comment questions whether a Historical Structure Report has been completed for the Spring House. Refer to response to comment L1-3. At this time, a HSR has not been prepared for the Spring House. An HSR may be prepared at a later date, prior to commencement of work on the Spring House, but is not the document most appropriate for preparation of a Draft EIR. For the purposes of the EIR analysis, ASM Affiliates, Inc. prepared a Historic Resources Evaluation Report for the proposed project. It is included as Appendix E to the Draft EIR. This report evaluated the historical significance of the entire project site (including the Spring House), determined the potential impacts of the proposed project on the historical</p>

COMMENTS

RESPONSES

significance of the project site, and proposed mitigation measures to reduce impacts to a less than significant level. Therefore, the Historic Resources Evaluation Report was the appropriate and adequate document to prepare in support of the Draft EIR for the proposed project.

- O17-28** This comment suggests that the Spring House Restoration Alternative should include development of the Collier Clubhouse and History Hill area in order to meet all of the project alternatives. This comment implies that the alternative is being rejected because it does not meet all four project alternatives. The EIR does not recommend or reject alternatives. Refer to response to comment O1-2 for an explanation of the purpose of the EIR and project alternatives. Section 15126.6 of the CEQA Guidelines states that an EIR shall describe a range of reasonable alternatives that would: 1) feasibly attain most of the basic objectives of the project, and 2) avoid or substantially lessen the significant effects of the proposed project. A Spring House Restoration Alternative that would also develop the Collier Club House and History Hill areas would result in the same impacts as the Spring House Rehabilitation Alternative and would not provide reasonable range of alternatives. Therefore, a combined Spring House restoration and reduced project alternative was addressed in the EIR in order to provide an alternative that would reduce all of the project's potentially significant impacts, and avoid the potential noise impact from the Collier Clubhouse area. The City Council will consider the proposed project and all proposed alternatives when making a decision on the project, and has the option of adopting a combination of alternatives. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity.
- O17-29** This comment questions whether the project has been reviewed by the Historic Preservation Commission for approval. As discussed in Section 4.3.4, Discretionary and Ministerial Actions, the project would require a public hearing by the Historic Preservation Commission as part of project approval in order to obtain a Permit to Demolish a Historic Landmark or Contributing Structure within a Historic District.

COMMENTS

RESPONSES

O17-30.

Federal Nexus

Is there any Federal funding or permitting involved in the planning or proposed implementation of this project? If so, has NEPA or Section 106 of the NHPA been, or will be, undertaken?

Offer of Assistance

I wish to reiterate my offer to provide my twenty plus years of experience and knowledge in historic preservation to help the City scope and implement necessary historic structure assessments to ensure that all adaptive reuse alternatives that haven't been considered, or studied at this point, are brought forward.

In this way, the City and community can make informed, prudent and feasible recommendations in preserving our historic Spring House, be it restoration or rehabilitation. This includes finding uses that will give this historical property renewed life for another century of civic usefulness.

Since I and others in the community have brought this issue forward, I have been approached by several other civic leaders as to the offer of support for a fundraising campaign to help assist the City with these necessary studies and if necessary, interim mothballing of the structure while permanent restoration funds are found.

O17-31.

It is bitterly ironic after spending three years prepping, and over a year celebrating, our City's Centennial to have the City even consider demolishing the only historical landmark wholly in their direct management.

I, as are many others in our community, am truly committed to helping participate, organize and guide an effort for the prudent and feasible reuse of the Spring House historical landmark property as part of a newly re-furbished and invigorated Collier Park for La Mesa's next century.

We can, and should, all work together to implementing a visionary project--perhaps somewhat similar to D.C. Collier--the community-builder who foresaw a suburban community here over one hundred years ago--and offered this property to us as a civic resource for posterity.

Please feel free to contact me for further assistance.

Sincerely,
James D. Newland, M.A.
La Mesa 91941

cc: Mayor Madrid;
Councilmembers Alessio; Arapostathis; Ewin; Sterling
City Manager Witt
Asst. City Manager Garrett,
Community Development Director Chopyk

O17-30 This comment questions whether federal funding would be pursued for the proposed project and, if so, would Section 106 review be undertaken. Refer to response to comment F1-1. An Environmental Assessment in compliance with NEPA is currently being prepared for the proposed project, including Section 106 review.

O17-31 This comment offers personal assistance from the commenter to aid the City in fundraising and completion of historic structure assessment. This comment does not address the adequacy or accuracy of information provided in the Draft EIR, but does reiterate support for an alternative that would not demolish the Spring House. Refer to response to comment O17-9.

COMMENTS

RESPONSES

Letter O18: Ken and Donna Niemeier

Ken and Donna Niemeier
4805 Lee Ave
La Mesa, CA 91942

Chris Jacobs, Senior Planner
City of La Mesa
8130 Allison Ave
La Mesa, CA 91942

March 7, 2013

Dear Mr. Jacobs,

My husband and I have owned property in La Mesa since 1973. I worked for the La Mesa-Spring Valley School district for 35 years and retired in 1999, when I became an active member of the La Mesa Historical Society.

O18-1.

I have always had an interest in history. I am my families "historian" and I made sure every school I worked at included local history and the school's history as part of the curriculum. I feel very strongly that maintaining school and community pride goes a long way in maintaining clean, healthy, and safe environments for the citizens who live in those communities. Community pride starts with knowing the history of the people who settled the area and knowing why they came and how they developed the area and what they left as building blocks for us to use and improve.

We must do everything we can to preserve any and all buildings and artifacts that embody the City's history. I feel that the Spring House section of the EIR should be changed. The proposed partial demolition and reconstruction of the Spring House for adaptive reuse as an outdoor interpretive center would destroy a historic, landmarked building. There would be no way to get it back!

O18-2.

It is our opinion that the EIR should support the preservation or rehabilitation of the Spring House.

Thank you for your consideration of this change.

Sincerely,
Ken and Donna Niemeier
Ken and Donna Niemeier

O18-1 This comment introduces the commenter. It does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.

O18-2 This comment expresses support for an alternative that would not demolish the Spring House. The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. In addition, as described in response to comment L1-2, the Draft EIR has been revised to include an additional alternative (Spring House Deterioration Prevention Alternative) that combines the proposed project with the No Project Alternative and Spring House Rehabilitation Alternative. Under this alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure.

All project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any or all of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity.

The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

COMMENTS

RESPONSES

Letter O19: Patricia I. O'Reilly

March 3, 2013

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, California 91942

Re: DEIR for the Collier Park Master Plan

Dear Mr. Jacobs,

O19-1. The long-awaited DEIR for the Collier Park Master Plan has now been published and is being received with considerable chagrin. As one of those who participated in the initial planning sessions, there were many ideas put forward for discussion and debate and the goals as stated in the Draft EIR are laudable and in accordance with those planning sessions.

However, with regard to the Historic Spring House, the stated preferences expressed by all were for PRESERVATION, RENOVATION, and, CONSERVATION, and total demolition was never a stated or acceptable alternative. Finding that in the DEIR was stunning.

O19-2. Improving and upgrading the park as a whole is what our community wants and needs, but that does NOT include the destruction of the Spring House. Suggesting "recordation" as a "mitigation measure" is purely ludicrous. The loss of the original building would be both disgraceful and irreversible. It cannot be allowed to happen.

Creating new gathering spaces and recreational facilities will be laudable, but should come AFTER preservation and conservation of the heart of the park, the Spring House.

O19-3. If we must fundraise, so be it. Grant funds can be sought. Donors can be sought. A public effort can be established. Our Centennial Committee did a good job of raising funds for the creation of the Legacy Project and has already made plans for an ongoing effort to raise the balance necessary to complete the project. There is no reason a like effort cannot be put toward preserving our heritage rather than razing it to the ground. The destruction of an Historic Landmark is certainly not a desired outcome.

I am therefore adamantly opposed to the DEIR as current written. We can do better.

Yours truly,
 Patricia I. O'Reilly

O19-1 This comment expresses the commenter's surprise that demolition of the Spring House was proposed as part of the project. It does not address the adequacy or accuracy of information provided in the Draft EIR. However, this comment incorrectly states that the proposed project would result in total demolition of the Spring House structure. As described in detail in Chapter 4.0 of the Project Description, the existing Spring House would be partially deconstructed down to the existing stone rubble wall base and cistern. The creation of the outdoor interpretive center would include the stabilization of the Spring House concrete and stone wall structure, addition of a new concrete floor finish and water-proofing of the cistern. The existing Spring House stone rubble wall base and cistern would not be demolished. Therefore, total demolition of the Spring House would not occur under the proposed project.

O19-2 This comment implies that cultural resources impacts related to the Spring House are not mitigated to a less than significant level, and expresses support for an alternative that would not demolish the Spring House. CEQA does not require historical resources to be avoided or preserved in order to be considered a less than significant impact. The City has determined that the impacts to the Spring House would be mitigated to a less than significant level with implementation of mitigation measures Cul-1 and Cul-2. Refer to response to comment O6-4 for additional information regarding the City's determination.

The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. In addition, as described in response to comment L1-2, the Draft EIR has been revised to include an additional alternative (Spring House Deterioration Prevention Alternative) that combines the proposed project with the No Project Alternative and Spring House Rehabilitation Alternative. Under this alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure.

COMMENTS

RESPONSES

All project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any or all of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity.

The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

- O19-3** This comments states that funding should be sought for preserving Spring House and offers examples of funding sources. This comment does not address the adequacy or accuracy of information provided in the Draft EIR. Refer to response to comment O19-2 regarding alternatives to be considered by the City Council that would not demolish the Spring House.
- O19-4** This comment states opposition to the Draft EIR. This comment does not state an inadequacy or inaccuracy in the Draft EIR. It is assumed that the commenter is opposed to the project as proposed, and is implying that the project has been selected as a preferred alternative. Refer to response to comment O1-2. The EIR does not recommend or reject alternatives. Refer to response to comment O1-2 for an explanation of the purpose of the EIR and project alternatives.

COMMENTS



Save Our Heritage Organisation
Saving San Diego's Past for the Future

March 7, 2013

Chris Jacobs, Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

Dear Mr. Jacobs,

O20-1. The City of La Mesa Development Department has recently released a Draft Environmental Impact Report (DEIR) for the Collier Park Master Plan. The plan's current "preferred alternative," as written in the Draft EIR, calls for the complete demolition of the historic 1907 Collier Spring House (City of La Mesa Historical Landmark #3).

Luckily, in Section 8.2.2 of the DEIR, there is an alternative that would result in the preservation and reuse of the Spring House. This Spring House Rehabilitation alternative would eliminate the significant impacts under CEQA and the un-mitigable, irreversible demolition of this listed historical property.

I am writing on behalf of Save Our Heritage Organisation (SOHO) to strongly encourage you to pursue this alternative. As San Diego's oldest and only countywide historic preservation organization, SOHO supports the preservation of the historical links and landmarks that contribute to our community's special identity, depth, and character.

O20-2. The Rehabilitation Alternative, with the restored and rehabilitated Spring House clearly provides a better match for the uses called out to replace it in the plan. The rehabilitated Spring House could be used for the proposed interpretive facility to help educate Park visitors to the site and community's history as well as providing support space for the Park's proposed new amphitheater and group event spaces. Therefore the Spring House alternative reduces the mitigation costs associated with its demolition, the potential for legal challenge to protect it from the current plan's demolition, and better complements the Master Plan's goals for the future benefit of the Park.

SOHO supports the Spring House Rehabilitation Alternative part of the preferred plan for the final Collier Park Master Plan and hopes you will likewise support the preservation of this important historic La Mesa landmark.

Sincerely,

Bruce Coons
 Executive Director

RESPONSES

Letter O20: Bruce Coons (Save Our Heritage Organisation)

O20-1 This comment refers to the proposed project as the City's "preferred alternative" and also states the project as proposed would completely demolish the Spring House. Refer to response to comment O1-2 for a detailed response to this comment. The existing Spring House stone rubble wall base and cistern would not be demolished. Therefore, total demolition of the Spring House would not occur under the proposed project. Additionally, the proposed project has not been named a preferred alternative. It is not the purpose of an EIR to select an alternative, nor does analysis in an EIR indicate that the project as proposed will be adopted by the City Council.

O20-2 This comment expresses support for the Spring House Rehabilitation Alternative. This alternative and all project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives addressed in the EIR. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

COMMENTS

RESPONSES

San Diego, CA 92104

Letter O21: Donald Taylor

Mr. Chris Jacobs
 Senior Planner, City of La Mesa
 8130 Allison Ave.
 La Mesa, CA 91942

Dear Mr. Jacobs,

I grew up not far from Colliers Park. The place was always special to a little kid, and I well remember cars lining up there to fill their water bottles from the spring water.

O21-1.

Since that spring had a major role in La Mesa even coming into existence (was it not first called La Mesa Springs?) surely the spring house should be restored and be left as a memorial to the town's origin. Please see to this relatively minor change to the plan and keep this one of only several historic sites recognized in La Mesa.

Sincerely,



Donald Taylor

O21-1 This comment expresses support for an alternative that would not demolish the Spring House. The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. In addition, as described in response to comment L1-2, the Draft EIR has been revised to include an additional alternative (Spring House Deterioration Prevention Alternative) that combines the proposed project with the No Project Alternative and Spring House Rehabilitation Alternative. Under this alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure.

All project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any or all of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity.

The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

COMMENTS

From: noreply@civicplus.com [mailto:noreply@civicplus.com]
 Sent: Thursday, March 07, 2013 12:21 PM
 To: Cheryl Davis
 Subject: Online Form Submittal: Contact Us

The following form was submitted via your website: Contact Us
 Please select from the following options:: Community Development
 Name: Gregory May
 City: San Diego
 State: CA
 Zip: 92103
 Email Address: gregory_may_jr@yahoo.com (If you would like your comments directed to a specific individual, put the person's name in your message.):

Attention: Chris Jacobs, Planning
 RE: Collier Park Master Plan/ Spring House

O22-1.

I understand that the current Collier Park Master Plan calls for partial demolition of the historic Spring House. I, a lover of old and historic structures hope that an Alternate version of the plan would be considered, one that respects the Spring House, and restores it to an original state, rather than changing it. What makes this a great place is the history there. The best 'improvements' would be to bring the park back to it's original design for future generations.

Thank You.

Additional Information:
 Form submitted on: 3/7/2013 12:20:50 PM
 Submitted from IP Address: 76.192.161.246
 Referrer Page: <http://www.cityoflamesa.com/directory.aspx?EID=57>
 Form Address: <http://www.cityoflamesa.com/Forms.aspx?FID=43>

RESPONSES

Letter O22: Gregory May

O22-1 This comment expresses support for an alternative that would not demolish the Spring House. The Draft EIR includes two alternatives in Chapter 8.0, Alternatives, which would not demolish the Spring House: the Spring House Rehabilitation Alternative and the Spring House Restoration Alternative. In addition, as described in response to comment L1-2, the Draft EIR has been revised to include an additional alternative (Spring House Deterioration Prevention Alternative) that combines the proposed project with the No Project Alternative and Spring House Rehabilitation Alternative. Under this alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure.

All project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any or all of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity.

The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

COMMENTS

RESPONSES

Letter O23: Charles and Julie Bras

From: Chuck [mailto:chuckrb@cox.net]
Sent: Monday, March 11, 2013 9:35 AM
To: Chris Jacobs
Subject: Collier Park Master Plan DEIR

Dear Chris:

It is imperative that the Spring House Rehabilitation Alternative becomes part of the preferred plan for the final Collier Park Master Plan.

- O23-1.** How can there ever be adequate mitigation for the destruction of this historical building? This part of our past must be preserved so, in another 100 year from today, our great-great grandchildren can enjoy a part of La Mesa History.

Charles and Julie Bras
 La Mesa CA 91942

- O23-1** This comment expresses support for the Spring House Rehabilitation Alternative. This alternative and all project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives addressed in the EIR. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.

This comment also makes reference to a preferred alternative and questions whether impacts related to demolition can be mitigated. Refer to response to comment O1-2 regarding preferred alternatives, and response to comment O6-4 for information regarding the City's determination the cultural resource impacts would be reduced to less than significant level.

COMMENTS

RESPONSES

Letter O24: James Newland (Article)

Master Plan Threatens Historic Spring House

By James D. Newland



I am writing to those interested in the preservation of the heritage of La Mesa-- and its current and future civic health.

The City of La Mesa Development Department has recently released a Draft Environmental Impact Report (DEIR) for the Collier Park Master Plan.

The Plan is now in the period in which public comment is accepted as part of the project's requirement to comply with the guidelines and processes of the California Environmental Quality Act (CEQA).

O24-1.

Overall the plan calls for a major renovation of the [historic Collier Park](#) (the whole park along with the 1907 constructed Spring House is listed as City of La Mesa Historical Landmark #3).

The major goals of the plan call for improving and upgrading the existing facilities, adding new gathering, event, and recreational facilities, and generally making the park more attractive for visitors, while discouraging the loitering of those who are using the park for illicit and illegal activities.

These are all goals for the improved future of Collier Park that most La Mesans can and should support.

O24-2.

However, the plan's current "preferred alternative," as written in the Draft EIR, would do so at the cost of the complete demolition to the historic 1907 Collier Spring House (one of the few buildings in La Mesa that has been determined to be eligible for both the California and National Registers of Historic Places as well as a listed City Landmark).

O24-3.

In CEQA, such an adverse effect to a listed, or eligible for listing, Historical Resource, is a significant adverse impact to the environment. This is because demolition is an irreversible action to a historical property.

O24-4.

The City's Master Plan puts forth some "mitigation measures," such as recordation of the historical Spring House with photos and drawings, and the construction of a new structure as an interpretive exhibit. These efforts cannot truly replace the irreversible loss of the original building.

O24-1

This comment expresses support for the goals of the proposed project and summarizes the CEQA process. No further response is necessary.

O24-2

This comment refers to the proposed project as the City's "preferred alternative" and also states that the project as proposed would completely demolish the Spring House. Refer to response to comment O1-2 for a detailed response to this comment. The existing Spring House stone rubble wall base and cistern would not be demolished. Therefore, total demolition of the Spring House would not occur under the proposed project. Additionally, the proposed project has not been named a preferred alternative. It is not the purpose of an EIR to select an alternative, nor does analysis in an EIR indicate that the project as proposed will be adopted by the City Council.

O24-3

This comment states that demolition of a historical resources is a significant adverse environmental impact. The Draft EIR concurs with this statement. The Draft EIR concludes in Section 5.4.4.2, Historical Resources, the partial demolition and reuse of the Spring House 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. Therefore, implementation of the proposed project would result in a potentially significant impact associated with historical resources.

O24-4

This comment suggests that proposed mitigation measures Cul-1 and Cul-2 do not adequately reduce impacts related to partial demolition of the Spring House to a less than significant level. The City disagrees with this conclusion. Refer to response to comment O6-4 for a detailed response regarding the City's determination the cultural resource impacts would be reduced to less than significant level.

COMMENTS

RESPONSES

	<p>This is especially the case since this building is a touchstone to our community's heritage for our now century-old city.</p> <p>The Spring House was constructed for David Charles (D.C.) Collier in 1907. Collier was a pioneer community developer in La Mesa and throughout San Diego County. He would become the President of the 1915 Exposition in Balboa Park-- just one of his notable civic accomplishments.</p> <p>Although the original hope for the Spring House was as a commercial bottling operation of the natural springs that first attracted rancher Robert Allison to the area in 1869, the Spring House and park evolved into a place reflecting La Mesa's community and civic pride.</p> <p>It was Collier who offered this property, including the Spring House, to the community in 1910 if they incorporated. Collier Park thus became our first city park after incorporation in 1912 (which we just spent a year celebrating), and later becoming the home of the city's first public swimming pool, and a site of civic honor in 1948 when the Spring House and park got its last major renovation through a community-wide volunteer effort in concert with the City.</p> <p>Unfortunately the city owned and managed building, (one of the two City of La Mesa-owned historical landmarks) has sat boarded up for some 30 years-- awaiting use that would result in its care and maintenance.</p>	<p>O24-5 This comment provides information about the history of the Spring House. It does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.</p>
<p>O24-5.</p>	<p>THE SPRING HOUSE REHABILITATION ALTERNATIVE Luckily, the Collier Park Master Plan DEIR, as required by CEQA, provides additional alternatives that consider less environmentally impacting actions to the draft plan's current preferred alternative scope.</p>	<p>O24-6 This comment expresses support for the Spring House Rehabilitation Alternative. This alternative and all project alternatives will be considered by the City Council at the time of project approval. The City Council has the option of adopting any one or a combination of alternatives addressed in the EIR. As discussed in Section 15041 of the CEQA Guidelines, the City Council has the authority to require feasible changes to any of the activities involved in a project to lessen or avoid environmental impacts. Feasible changes could include incorporation of feasible portions of an alternative that pertain to a specific project activity. The EIR does not provide a recommendation to the City Council. However, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt the new Spring House Deterioration Prevention Alternative (see response to comment L1-2). Under the staff suggested alternative, the project would be implemented as proposed in the Panhandle, Collier Clubhouse, and History Hill areas of the Park. Regarding the Spring House, in the short-term it would be mothballed by a qualified historic architect to stabilize and protect the building from further deterioration while, in the long-term, research on grants and other funding opportunities are pursued for restoration, rehabilitation or repurposing of the structure. This would prevent the demolition of the Spring House and avoid the proposed project's potentially significant historical resources impact to the Spring House structure. The environmental impacts of the Spring House Deterioration Prevention Alternative have been adequately addressed in the analysis of the proposed project, Spring House Rehabilitation Alternative, and No Project Alternative.</p>
<p>O24-6.</p>	<p>And in Section 8.2.2 of the DEIR, there is an alternative that would result in the preservation and reuse of the Spring House.</p>	
<p>O24-7.</p>	<p>This Spring House Rehabilitation alternative would eliminate the significant impacts under CEQA and the un-mitigable, irreversible demolition of this listed historical property.</p>	<p>O24-7 This comment reiterates the opinion that the proposed project's impact to historical resources cannot be mitigated to a less than significant level, and expresses support for the Spring House Rehabilitation Alternative. Refer to response to comments O6-4 and O24-6 for detailed responses to this comment.</p>
<p>O24-8.</p>	<p>The Rehabilitation Alternative, with the restored and rehabilitated Spring House clearly provides a better match for the uses called out to replace it in the plan. The rehabilitated Spring House could be used for the proposed interpretive facility to help educate Park visitors to the site and community's history as well as providing support space for the Park's proposed new amphitheater and group event spaces.</p>	<p>O24-8 This comment reiterates support for the Spring House Rehabilitation Alternative. Refer to response to comment O24-6 for a response to this comment.</p>

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O24-9.

Therefore the Spring House alternative reduces the mitigation costs associated with its demolition, the potential for legal challenge to protect it from the current plan's demolition, and better compliments the Master Plan's goals for the future benefit of the Park.

And to indicate that this was not an infeasible or imprudent preservation demand, I have spoken to City staff and offered my twenty plus years of experience and knowledge in historic preservation to help the City scope and implement necessary historic structure assessments to ensure that all adaptive reuse alternatives that haven't been considered, or studied at this point, are brought forward.

O24-10.

In this way, the City and community can make informed, prudent and feasible recommendations in preserving our historic building, which includes finding a new use that will give it renewed life for another century of civic usefulness.

Since I and others in the community have brought this issue forward, I have been approached by several other civic leaders as to the offer of support for a fund raising campaign to help assist the city with these necessary studies and if necessary, interim mothballing of the structure while permanent restoration funds are found (currently there is no funding in place for any of the plan's proposed improvements).

O24-11.

CALL FOR ACTION

The first step in ensuring the appropriate treatment of our historical resource is to make certain that the Spring House Rehabilitation Alternative becomes part of the preferred plan for the final Collier Park Master Plan.

The city needs to hear from all those that agree that the historic resources of Collier Park need to be preserved—especially the already listed Spring House.

Whether an individual and/or organization, it is important for your position to be documented in the comments to the DEIR.

O24-12.

The Collier Park Master Plan DEIR has a written comment deadline of March 11, 2013. You can download and read the document and appendices at: <http://www.cityoflamesa.com/?nid=1234>

Send your comment letters to the DEIR to:
Chris Jacobs, Senior Planner
City of La Mesa, 8130 Allison Avenue, La Mesa, CA 91942

O24-9

This comment states that the Spring House Rehabilitation Alternative would result in reduced costs compared to the proposed project, including construction of the interpretive center. This statement is incorrect. Refer to response to comment O9-8. A preliminary Review and Analysis of Development Alternatives was prepared for the Collier Park renovations by Keyser Marston Associates in 2011. The analysis determined that the outdoor interpretive center alternative for the Spring House area would cost approximately \$380,000, while rehabilitation of the Spring House structure would cost approximately \$913,000. This analysis was based on standard construction practices and did not take into account implementation of the Secretary of the Interior's Standards for Rehabilitation. It is anticipated that compliance with the Secretary of the Interior's Standards would result in additional costs.

This comment also expresses the commenter's opinion that the Spring House Rehabilitation Alternative would reduce the potential for legal challenge to protect the Spring House, and better compliments the Collier Park Master Plan goals. As stated in response to comment O24-6, based on public comments received during the EIR 45-day public review period, City staff is planning to recommend that the City Council adopt a project that would not demolish the Spring House. However, the project as proposed would meet the goals of the Collier Park Master Plan. Preservation of the Spring House was not included as a goal of the Master Plan.

O24-10

This comment offers personal assistance from the commenter to aid in the completion of a historic structure assessment. This comment does not address the adequacy or accuracy of information provided in the Draft EIR, but does reiterate support for an alternative that would not demolish the Spring House. Refer to response to comment O24-6.

O24-11

This comment reiterates support for the Spring House Rehabilitation Alternative. Refer to response to comment O24-6. This comment also makes reference to a preferred alternative. The EIR does not select a preferred alternative. Refer to response to comment O1-2 regarding preferred alternatives.

O24-12

This comment encourages readers to submit comments on the Draft EIR during the public review period. This comment does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.

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HELP RENEW OUR VISIONARY HERITAGE

It would be bitterly ironic after spending three years prepping, and over a year celebrating, our city's Centennial to have the city demolish the only historical landmark in their direct management.

O24-13.

I, as are many others in our community, am truly committed to helping participate, organize and guide an effort for the prudent and feasible reuse of the Spring House historical landmark property as part of a newly re-furbished and invigorated Collier Park for La Mesa's next century.

And with your help and participation, we can assist the city with implementing this visionary project--perhaps somewhat similar to the community-builder who foresaw a suburban community here over one hundred years ago--and offered this property to us as a civic resource for posterity.

James D. Newland, a La Mesa Resident, is vice president of the La Mesa Historical Society.

O24-13 This comment reiterates support for an alternative that would not demolish the Spring House. Refer to response to comment O24-6.

COMMENTS

RESPONSES



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

Letter R1: State Clearinghouse

January 6, 2015

Chris Jacobs
City of La Mesa
8130 Allison Avenue
La Mesa, CA 91942

Subject: Collier Park Renovations Project
SCH#: 2011101051

Dear Chris Jacobs:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on January 5, 2015, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

R1-1.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

R1-1 This comment letter acknowledges that the City complied with the State Clearinghouse review requirements for draft environmental documents pursuant to CEQA. The letter confirms that the revised Draft EIR was submitted to select state agencies for review. At the close of public review on January 5, 2015, no state agencies had submitted their comments to the State Clearinghouse. This information is consistent with the comment letters received by the City regarding the revised Draft EIR.

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**Document Details Report
State Clearinghouse Data Base**

SCH# 2011101051
Project Title Collier Park Renovations Project
Lead Agency La Mesa, City of

Type EIR Draft EIR
Description The project proposes the construction of recreational facilities and other improvements at Collier Park in the City of La Mesa, San Diego County, California. The proposed project is organized into four areas: 1) Panhandle; 2) Spring House; 3) History Hill; and 4) Collier Club House.

Lead Agency Contact

Name Chris Jacobs
Agency City of La Mesa
Phone (619) 667-1188 **Fax**
email
Address 8130 Allison Avenue
City La Mesa **State** CA **Zip** 91942

Project Location

County San Diego
City La Mesa
Region
Lat / Long 32° 45' 33" N / 117° 0' 53" W
Cross Streets Palm Avenue at Pasadena Avenue
Parcel No. 494-642-01, 02, 03, 494-651-01
Township 16S **Range** 1W **Section** 19/30 **Base**

Proximity to:

Highways SR 94, SR 125, I-8
Airports No
Railways SD&AZ RR / MTS
Waterways Lake Murray Reservoir, Alvarado Creek
Schools Various
Land Use Z: R1S-P
 GP: Recreation Use / Neighborhood Park

Project Issues Archaeologic-Historic; Biological Resources; Drainage/Absorption; Geologic/Seismic; Noise; Soil Erosion/Compaction/Grading; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Other Issues; Aesthetic/Visual

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; California Highway Patrol; Caltrans, District 11; Air Resources Board; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 11/21/2014 **Start of Review** 11/21/2014 **End of Review** 01/05/2015

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Letter R2: Army Corps of Engineers



DEPARTMENT OF THE ARMY

Los Angeles District Corps of Engineers
Regulatory Division-Carlsbad Field Office
5900 La Place Court, Suite 100
Carlsbad, CA 92008

December 15, 2014

REPLY TO
ATTENTION OF

Office of the Chief
Regulatory Division

City of La Mesa
Community Development Department
8130 Allison Avenue
La Mesa, CA 91942

SUBJECT: Information regarding requirement for Department of the Army Permit

Dear Sir/Madam:

R2-1.

This is in response to information received regarding Collier Park Renovations Project. Based on the information you have provided, we are unable to determine if the proposed work would be regulated under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. Please review your project and determine if you need a permit.

R2-2.

Applications and additional information are available on our website <http://www.spl.usace.army.mil/Missions/Regulatory/PermitProcess.aspx>. If you have any questions, please contact Shari Johnson of my staff at 760-602-4829 or via e-mail at Shari.Johnson@usace.army.mil.

Sincerely,

Therese O. Bradford
Chief, South Coast Branch

- R2-1** This comment states that based on the information provided, the U.S. Army Corps of Engineers (USACE) were unable to determine if the proposed project would be regulated under a Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. This comment states that the project should be reviewed to determine if a permit is required under the above stated Acts. Section 404 of the Clean Water Act “authorizes the Secretary of the Army, acting through the Chief of Engineers, to issue permits for the discharge of dredged or fill material into the waters of the United States at specified disposal sites”¹. Section 10 of the Rivers and Harbors Act “prohibits the unauthorized obstruction or alteration of any navigable water of the United States unless a permit has been issued by the Army Corps of Engineers” (Darden 2014). As stated in Section 5.3 (Biological Resources) of the revised Draft EIR, an isolated segment of a concrete-lined drainage channel transects the southern half of the project site; however, no riparian and wetland vegetation or earthen bed and bank were observed. As there are no traditional navigable waters in the vicinity of the project site, the drainage channel lacks connectivity and an apparent nexus to any downstream navigable waters. Due to this lack of connectivity, as well as the man-made nature of the drainage channel and the City’s storm water drainage system into which it discharges, the drainage channel does not fall under the regulatory jurisdiction of the USACE. Furthermore, jurisdictional waters and wetlands are considered to be absent from the project site. Therefore, the project is not required to obtain a Section 404 or Section 10 permit. No changes to the revised Draft EIR are required in response to this comment.

- R2-2** This comment provides the website address to obtain additional information related to the USACE permit process and states that any questions can be forwarded to the provided contact person. This comment does not address the adequacy or accuracy of the revised Draft EIR. No further response is required.

¹ Darden, Richard L, Ph.D. presented on behalf of the Regulatory Division of the Charleston District of the U.S. Army Corps of Engineers.2014. What You Need to Know About Section 404 Permits. accessed January 12, 2015, available https://www.dnr.sc.gov/marine/NERR/present/regulations/Darden_USACEprocess.pdf

COMMENTS

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Letter R3: La Mesa Historical Society

From: James Newland [<mailto:newljones@cox.net>]
Sent: Sunday, January 04, 2015 6:56 PM
To: Chris Jacobs
Subject: Fwd: Collier Park D.E.I.R. Comments

Mr. Jacobs

R3-1.

Find attached the comments from the La Mesa Historical Society for the re-circulated Draft Environmental Impact Report for the Collier Park Master Plan. A hard copy will follow in the mail.

R3-2.

Feel free to contact me directly for any clarifications or to partake of our offers of assistance in the immediate and long-term preservation of the Spring House and implementation of the Master Plan.

Sincerely

James D. Newland
 La Mesa Historical Society

R3-1

This comment states that the comment letter from the La Mesa Historical Society for the Draft EIR is provided electronically and that a hard copy of the comment letter will also be mailed to the City. This comment does not address the adequacy or accuracy of the Draft EIR. No revisions to the Draft EIR are necessary.

R3-2

This comment states that the commenter may be contacted by the City for further clarification on the provided comments as well as to offer assistance in the immediate and long-term preservation of the Spring House and implementation of the Master Plan. This comment does not address the adequacy or accuracy of the Draft EIR. No revisions to the Draft EIR are necessary.

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P.O. Box 882, La Mesa, CA 91944

Museum: Rev. Henry A. McKinney House (1908)
8369 University, La Mesa
(619) 466-0197

January 5, 2015

Chris Jacobs, Senior Planner
City of La Mesa
8130 Allison Avenue
La Mesa, CA 91942

Re: Comments on Re-circulated E.I.R. for Collier Park Master Plan

Dear Mr. Jacobs,

On behalf of the La Mesa Historical Society, we are writing today in general support of the revised Draft Environmental Impact Report for the Collier Park Master Plan.

We are pleased to see that the previous, and inappropriate, treatments for the historic Collier Park Spring House (City Landmark #3), including its demolition, have been removed from the plan and project.

R3-3. Both the revised Spring House Rehabilitation and Spring House Restoration Alternatives now have appropriate preservation treatments (as found in the *Secretary of the Interior's Treatments for Historic Properties*) called out for this extremely significant historic resource property.

In addition to the removal of the Spring House demolition scope from the master plan, the revised plan also has a more comprehensive and holistic approach to all the historic elements and features of Collier Park.

R3-4. We do want to identify some confusing language and provide some clarification on the issue of "mothballing" the Spring House. The most notable examples being that the summary shown in the Notice of Availability and on the website introduction page and in the Project Description Section 1.2 indicates that the treatment proposed in the Master Plan is to "mothball" the Spring House. That is incorrect.

R3-5. Mothballing needs to be completed for the historic building until funds are found to implement the plan (Rehabilitation or Restoration), but it is not the appropriate permanent scope for the Master Plan (see Revised Chapters 4 and 8 for the correct alternative and descriptions). We certainly support immediate mothballing until funds for restoration or rehabilitation are found, but it is not the Plan's preferred alternative.

R3-3 This comment supports the revised Draft EIR in the removal of the Spring House demolition from the scope of the Master Plan and EIR, the addition of preservation treatments for the revised Spring House Rehabilitation and Spring House Restoration Alternatives, and the revision of the Master Plan to incorporate a comprehensive and holistic approach to all the historic elements and features of Collier Park. This comment does not address the adequacy or accuracy of the revised Draft EIR. No further response is required.

R3-4 This comment states the commenter's opinion that the summary language provided in the Notice of Availability and on the City's website is incorrect by indicating that the proposed treatment in the Master Plan is to "mothball" the Spring House. However, as stated in Chapter 1 (Executive Summary) and Chapter 4 (Project Description) of the revised Draft EIR, the proposed treatment is to follow the mothballing process for the Spring House in compliance with the National Park Service's *Preservation Brief #31: Mothballing Historic Buildings* as a temporary preservation method while the City continues to identify possible funding options for long-term preservation of the Spring House. Based on this comment, the necessary changes will be made to the City's website to clarify that mothballing is a temporary treatment while funds are being identified for a permanent long-term preservation treatment. The Notice of Availability will not be revised and recirculated due to this minor text change. No revision to the revised Draft EIR is required in response to this comment.

R3-5 This comment supports the revisions identified in the revised Draft EIR, which identifies that immediate mothballing of the Spring House would be completed to document and stabilize the structure until funds for restoration and rehabilitation are identified. The comment also states that mothballing is not the preferred permanent scope for the Master Plan. At the time of the preparation of the revised Master Plan and revised Draft EIR, no funding for the long-term preservation of the Spring House had been identified. Should funding become available in the future, the City will draft specific plans for the Spring House, which may include restoration, rehabilitation, or adaptive reuse or repurposing of the structure. As stated in Chapter 4 (Project Description) of the revised Draft EIR, mothballing would be implemented in the short-term as a temporary preservation method until funding is identified for permanent long-term preservation treatments. No revision to the revised Draft EIR is required in response to this comment.

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P.O. Box 882, La Mesa, CA 91944

Museum: Rev. Henry A. McKinney House (1908)
8369 University, La Mesa
(619) 466-0197

- R3-6.** Another point of fact and plan element that requires clarification is that of the “restoration period” that is identified in the Spring House Restoration Alternative. The Plan now identifies this restoration period (see Section 1.5) as that of “the period of time when it was used as bottling works.”
- According to our historic research, the building’s use as a bottling works was actually fairly short (see Appendix E). As such, the current DEIR’s suggested historic period is too limiting to the broad and significant history that this building has provided to the greater La Mesa Community.
- We would request that no specific restoration period be determined for the Spring House until a Historic Structures Report is completed. The choice of a restoration period and/or specific treatments for either restoration or rehabilitation (adaptive use) requires the due diligence of such archival and physical investigations that a historic structures report provides.
- R3-7.** Another comment is in relation to the recommendations for treatment to the Spring House found in Section 4.3.2.2. Please be advised that use of the California Historical Building Code (Title 24, Chapter 8) can assist in finding alternatives methods to meeting the requirements of local structural and California Building Codes (CBC), while ensuring that the historic integrity of the Spring House is preserved.
- R3-8.** Please make sure that any architectural and engineering consultants brought into assist in the evaluation of the Spring House have expertise, training and experience in working with historic properties and the California Historic Building Code.
- R3-9.** In conclusion, we appreciate the efforts of City staff to remove the un-mitigable impacts to the historic properties of Collier Park that were in the previous DEIR.
- As such we wish to offer our support for the approval of the Collier Park Master Plan and re-iterate our offer to provide technical support to ensure that this historic asset to La Mesa can continue to serve the community for another century and beyond.

Sincerely,


James D. Newland, President
La Mesa Historical Society

R3-6 The comment states the commenter’s opinion that the restoration period for the Spring House Restoration Alternative in the revised Draft EIR, which has been determined as “the period of time when it was used as a bottling works”, is too limiting as the building’s use as a bottling works was fairly short and this period does not capture the broad and significant history of the structure. This comment recommends that no restoration period be identified for the Spring House Restoration Alternative until a Historic Structure Report has been completed and the appropriate restoration period and/or specific treatments for either restoration or rehabilitation of the structure have been identified. The City agrees with the commenter that no restoration period should be determined until a Historic Structure Report has been completed for the Spring House. As identified below, minor text revisions have been implemented in the Final EIR in response to this comment. These minor revisions do not constitute significant new information pursuant to Section 15088.5 of the CEQA Guidelines.

Discussions within Chapter 1 (Executive Summary) and Chapter 8 (Alternatives) have been revised to include a recommendation that the restoration period be determined as part of the Historic Structure Report (see Final EIR pages 1-4 and 8-2):

Spring House Restoration Alternative. This alternative would restore the contributing features of the Collier Park historic district, including the Spring House, drinking fountain, drainage channel and tennis court. The Spring House would be restored to accurately depict the form, features, and character of the building as it appeared during the period of significance (“restoration period”), which will be determined by the completion of a Historic Structure Report during the mothballing process. time in which it was used as a bottling works (“restoration period”). This alternative would implement the same improvements to the Panhandle and History Hill areas as are identified for the proposed project, except it would not replace the tennis court or remove the drainage channel, and it would maintain the historic old growth trees. Improvements to the Collier Club House area would not be implemented under this alternative.

Section 8.2.3 (Spring House Restoration Alternative) in Chapter 8 (Alternatives) has been revised to include a recommendation that the restoration period be determined as part of the Historic Structure Report (see Final EIR page 8-10):

The Spring House Restoration Alternative would restore the existing Spring House to accurately depict the form, features, and character of

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the building as it appeared during the period of significance (“restoration period”), which will be determined by the completion of Historic Structure Report during the mothballing process. ~~This will include the removal of time in which it was used a bottling works (“restoration period”) by removing~~ features from other periods in its history and reconstructing missing features from the restoration period.

Section 4.3.2.2 (Spring House) of Chapter 4 (Project Description) has been revised to include a recommendation that the restoration period be determined as part of the Historic Structure Report and to describe the purpose of the report (see Final EIR page 4-8):

- 1) Documentation
 - a) Document the architectural and historical significance of the building with the preparation of a Historic Structure Report. The Historic Structure Report would be prepared in accordance with NPS Preservation Brief #43: The Preparation and Use of Historic Structure Reports and will identify the period of significance (“restoration period”) for the Spring House.
 - b) Prepare a condition assessment of the building
- 2) Stabilization
 - a) Structurally stabilize the building, based on a professional condition assessment
 - b) Exterminate or control pests, including termites and rodents
 - c) Protect the exterior from moisture penetration
- 3) Mothballing
 - a) Secure the building and its component features to reduce vandalism or break-ins
 - b) Provide adequate ventilation to the interior
 - c) Secure or modify utilities and mechanical systems
 - d) Develop and implement a maintenance and monitoring plan for protection

In accordance with NPS Preservation Brief #31, implementation of the steps listed above would ensure that the Spring House is adequately documented, stabilized, and mothballed until funds can be acquired to put the deteriorating structure into a usable condition. Implementation of the maintenance and monitoring plan (step # 3d) would ensure that the Spring House is routinely checked and protected from pests and/or break-ins.

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In accordance with NPS Preservation Brief #43, a Historic Structure Report would be completed for the Spring House which provides documentary, graphic, and physical information on the property's history and existing condition. The Historic Structure Report is an effective part of the preservation planning process as it also addresses management and/or owner goals for the use or re-use of the property; provides the most appropriate approach to treatment; outlines scope of recommended work; and records the findings of research and investigation of the structure. The Historic Structure Report would be referred to once funds are acquired to restore or rehabilitate the Spring House.

Finally, Section 5.4.4.1 (Historical Resources) of Chapter 5 (Cultural Resources) has been revised to include the evaluation of the Spring House in a Historic Structure Report (see Final EIR page 5.4-17):

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 topography, vegetation, circulation, spatial organization and land pattern of the park, which are important contributing features of the Collier Park district. The City is proposing to mothball the Spring House for short-term preservation of the building until funds can be acquired to put the Spring House into a usable condition. In addition, a Historic Structure Report would be completed as part of the mothballing process to document the structure's history and existing physical condition and identify the period of significance ("restoration period") for the Spring House. Mothballing the Spring House would not alter its eligibility for inclusion in the CRHR and NRHP as a contributing element to the Collier Park historic district (ASM 2014).

- R3-7** This comment advises the use of the California Historical Building Code (Title 24, Chapter 8) to identify alternative methods to meet the requirements of local structural and California Building Codes (CBC), while still ensuring that the historical integrity of the Spring House is preserved. As identified below, Section 4.3.2.2 (Spring House) of Chapter 4 (Project Description) has been revised to include the commenter's suggested language regarding the California Historical Building Code (see Final EIR page 4-8):

Additionally, the existing Spring House building is structurally unstable due to damage and deterioration over time, which could present a significant hazard during strong seismic ground shaking. As a project design feature, the

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Spring House would include improvements to the building to meet structural requirements pursuant to the La Mesa Municipal Code Title 14 and the California Building Code to ensure that the building does not pose a safety hazard. Additionally, the preservation of the historical integrity of the Spring House would be achieved through compliance with the California Historical Building Code (Title 24, Chapter 8), which identifies alternative methods of meeting the requirements of the local structural and California Building Codes while still ensuring historical integrity.

This minor revision does not constitute significant new information pursuant to Section 15088.5 of the CEQA Guidelines.

- R3-8** This comment requests that any architectural and engineering consultants hired to evaluate of the Spring House have appropriate expertise, training, and experience in working with historic properties and the California Historical Building Code. The City agrees with the commenter and will require the selected architectural and engineering consultants to meet these requirements. No revision to the revised Draft EIR is required in response to this comment.
- R3-9** This comment provides support for the revised Draft EIR and Master Plan. The comment does not address the adequacy or accuracy of the revised Draft EIR. No further response is required.

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Letter R4: Save Our Heritage Organization



Save Our Heritage Organisation
Saving San Diego's Past for the Future

January 2, 2015

Bill Chopyk
 Community Development Director
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

Re: Collier Park Spring House

Dear Mr. Chopyk,

R4-1. On behalf of Save Our Heritage Organisation (SOHO), San Diego's oldest and only countywide historic preservation organization, I am writing today in support of the Restoration/Rehabilitation alternatives for the Collier Park Spring House.

R4-2. While we are pleased the Master Plan for Collier Park has been revised to remove demolition of the c.1907 Spring House, the summary shown in the Notice of Availability and on the City's website indicates incorrectly that the treatment proposed in the Master Plan is to "mothball" the Spring House.

R4-3. Though we support immediate mothballing of the building until funds are found to implement the rehabilitation or restoration, it is not the appropriate permanent scope for the Master Plan. Instead, Plan should also include the rehabilitation or restoration of the building.

Sincerely,

Bruce Coons
 Executive Director
 Save Our Heritage Organisation

R4-1 This comment expresses support of the Restoration/Rehabilitation Alternatives for the Spring House identified in the revised Draft EIR. This comment does not address the adequacy or accuracy of the revised Draft EIR. No further response is required.

R4-2 Refer to response R3-4 for a response to this comment.

R4-3 Refer to response R3-5 for a response to this comment.

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Letter R5: Laurise and John Gerk

Laurise Gerk
 4650 Lee Ave.
 La Mesa, CA 91942
 gerkmail@cox.net

January 4, 2015

Chris Jacobs
 Senior Planner
 City of La Mesa
 8130 Allison Avenue
 La Mesa, CA 91942

Dear Mr. Jacobs,

- R5-1.** We are sending this in response to the EIR for Collier Park Master Plan Spring House Restoration Alternative. We signed as support for no demolition initially, continue to support that directive, and are glad to see that demolition has been removed from consideration for this historic structure.
- R5-2.** What we would like to put on record now is support of Mr. Newland's stand that Mothballing not be considered a proposed treatment, as it would be a wrongful assumption that mothballing the structure could be a permanent solution.
- R5-3.** We also support Mr. Newland's stand that the choice of restoration period be determined after an Historic Structure Report is completed to make sure that the historic significance of the structure be as full as possible.

Sincerely yours,



Laurise Gerk and



John Gerk

- R5-1** This comment supports the Restoration Alternative for the Spring House. This comment does not address the adequacy or accuracy of the revised Draft EIR. No further response is required.
- R5-2** Refer to response R3-5 for a response to this comment.
- R5-3** Refer to response R3-6 for a response to this comment.

COMMENTS

RESPONSES

Letter R6: Patricia O'Reilly

From: Patricia O'Reilly
Sent: Monday, January 05, 2015 4:59 PM
To: Chris Jacobs
Cc: gerkmail@cox.net; James Newland
Subject: Collier Park

Dear Chris,

- R6-1.** Per our telephone conversation I am writing to express my accord with the letter addressed to you by James Newland, president of the La Mesa Historical Society regarding the Collier project EIR changes and also to confirm that I share the concerns regarding the Spring House and the specified Time Context statement.
- R6-2.** In addition I was distressed that there was no input from the Kumayaay community and suspect that for a variety of reasons the legal noticing procedure is somehow not reaching them. I would greatly appreciate your bringing up that possibility and doing all within your power to ascertain a better and more accurate way of seeking their participation.
- R6-3.** It was a pleasure speaking to you and I will look forward to the next phase of this project's slow progress toward completion, with a restored and vitalized Spring House and a full-ranging historical context. In the end a new Collier Park will be a site the entire community can be proud of.

Yours truly,
 Patricia I. O'Reilly

- R6-1** Refer to response R3-6 for a response to this comment.
- R6-2** This comment identifies the commenter's concern regarding the lack of input from the Kumayaay community and requests verification that local Native American tribes received the legal notices for the project. The commenter also provided a list of Native American contacts for the City's use. During the legal noticing of the Notice of Availability (NOA), the City sent the NOA to eight different contacts from the Kumayaay community as well as an additional 13 contacts from other Native American tribal groups. These contacts are listed on the distribution list for the NOA (see attachment RTC-A). The City completed its due diligence in noticing the Native American communities of the project and no comment letters were received from any of the tribal contacts. No revision to the revised Draft EIR is required in response to this comment.
- R6-3** This comment supports the project's progress towards a restored and revitalized Spring House and full-ranging historical context of Collier Park. This comment does not address the adequacy or accuracy of the revised Draft EIR. No further response is required.

COMMENTS

TRIBE	ADDRESS	PHONE/FAX	POSSIBLE CONTACT
AUGUSTINE BAND OF CAHUILLA INDIANS	POB 846 COACHELLA, CA 92236	P: 760.398.2531 F: 760.391.5094	LOMBARDI, MICHAEL
BARONA BAND OF MISSION INDIANS	1095 BARONA RD LAKESIDE, CA 92040	P: 619-443-6612 F: 619-443-0681	CLIFFORD LA CHAPPA, CHAIRMAN
BISHOP PAIUTE TRIBE	1335 ROCKING W. DR., STE 394 BISHOP, CA 93514	P: 760.872.6005 F: 760.872.6604	DELGADO, DALE JR.
CABAZON BAND OF MISSION INDIANS	84-245 INDIO SPRINGS PKWY INDIO, CA 92203.3499	P: 760.238.5898 F: 760.347.5942	SULLIVAN, JANICE
CAMPO BAND OF MISSION INDIANS	36190 CHURCH RD., STE 1 CAMPO, CA 91906	P: 619.938.6076 F: 619.938.6109	CUERO, HARRY P. JR.
CHEMEHUEVI INDIAN TRIBE	POB 1900 HAVASU LAKE, CA 92363	P: 760.858.4593 X 259 F: 760.858.5315	CHANDLER, CANDICE
EWIIAAPAAYP BAND OF KUMEYAAY INDIANS	4045 WILLOWS RD ALPINE, CA 91901	P: 619.445.6315 F: 619.445.9126	MICKLIN, WILLIAM
IIPAY NATION OF SANTA YSABEL	POB 558 SANTA YSABEL, CA 92070	P: 760.765.0553 F: 760.765.3772	PEREZ, VIRGIL
JAMUL INDIAN VILLAGE OF A KUMEYAAY NATION	14191 HWY 94 POB 612 JAMUL, CA 91935	P: 619.669.4785 F: 619.669.4817	HUNTER, RAYMOND
LA JOLLA BAND OF LUISENO INDIANS	POB 280 PAUMA VALLEY, CA 92061	P: 760.742.3688 F: 760.742.0371	RODRIGUEZ, SHERRY
LA POSTA BAND OF MISSION INDIANS	POB 1120 BOULEVARD, CA 91905	P: 619.478.9434 F: 619.478.9439	ESTRADA, RICHARD
MANZANITA BAND OF THE KUMEYAAY INDIANS	POB 1302 BOULEVARD, CA 91905	P: 619.766.4930 F: 619.766.4957	ELLIOT, LEROY
PALA BAND OF MISSION INDIANS	35008 PALA- TEMECULA RD. POB 50 PALA, CA 92059	P: 760.510.4574 F: 760.510.4566	BARNES, ANTHONY
PAUMA-YUIMA BAND OF MISSION INDIANS	POB 89 PAUMA VALLEY, CA 92061	P: 760.742.1020 F: 760.742.3387	DEVERS, CHARLES
PECHANGA INDIAN RESERVATION TEMECULA BAND OF LUISENO MISSION INDIANS	POB 1238 45000 PECHANGA WAY	P: 951.770.2515 F: 951.695.4673	CORNEJO, URSULA

COMMENTS

	TEMECULA, CA 92592		
QUECHAN INDIAN NATION	450 QUECHAN DR. WINTERHAVEN, CA 92283	P: 760.572.2413 X 747 F: 760.572.5478	DUFFY, CHARLES
RINCON SAN LUISENO BAND OF MISSION INDIANS	1 WEST TRIBAL ROAD VALLEY CENTER, CA 92082	P: 760.749.5100 F: 760.749.5111	BURTON, LAUREL
SAN PASQUAL BAND OF MISSION INDIANS	POB 2320 VALLEY CENTER, CA 92082	P: 760.291.5688 F: 760.291.5690	QUISQUIS, BLUE
STATE OF CALIFORNIA DEPT OF JUSTICE BUREAU OF GAMBLING CONTROL	POB 168024 SACRAMENTO, CA 95816	P: 916.227.3021 F: 916.227.0170	QUINT, WAYNE JR.
STATE OF CALIFORNIA GAMBLING CONTROL COMMISSION	2399 GATEWAY OAKS DR STE 220 SACRAMENTO, CA 95833	P: 916.263.0700 F: 916.263.0499	LITTLETON, TINA
SYCUAN BAND OF MISSION INDIANS	5483 DEHESA RD EL CAJON, CA 92019	P: 619.445.9723 F: 619.445.5918	ADKINS-PAYNE, YVONNE
TORRES MARTINEZ DESERT CAHUILLA INDIANS	POB 1160 THERMAL, CA 92274	P: 760.397.0300 F: 760.397.8146	DENHAM, TOM
TWENTY NINE PALMS BAND OF MISSION INDIANS	46-200 HARRISON PLACE COACHELLA, CA 92236	P: 760.863.2438 F: 760.775.4639	HANSEN, NORM
VIEJAS BAND OF KUMEYAAY INDIANS	POB 908 ALPINE, CA 91903	P: 619.659.1703 F: 619.659.1968 P: 619.445.3810 F: 619.445.5337	NICHOLS, JASON

ATTACHMENT RTC-A
Notice of Availability
Native American Contacts Distribution List

Jamul Indian Village
Kenneth Meza, Chairperson
P.O. Box 612
Jamul, CA 91935

Inaja Band of Mission Indians
Rebecca Osuna, Spokesperson
2005 S. Escondido Blvd.
Escondido, CA 92025

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O. Box 270
Santa Ysabel, CA 92070

Kumeyaay Cultural Repat. Comm.
Steve Banegas, Spokesperson
1095 Barona Road
Lakeside, CA 92040

Kumeyaay Cultural Heritage Pres.
Paul Cuero
36190 Church Road, Suite 5
Campo, CA 91906

San Pasqual Band of Mission Indians
Allen Lawson, Chairperson
P.O. Box 365
Valley Center, CA 92082

Kwaaymii Laguna Band of Mission
Indians
Carmen Lucas
P.O. Box 775
Pine Valley, CA 91962

Ewiiapaayp Tribal Office
Will Micklin, Exec. Director
4054 Willows Road
Alpine, CA 91901

Barona Group of the Capitan Grande
Band of Mission Indians
Edwin Romero, Chairperson
1095 Barona Road
Lakeside, CA 92040

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
P.O. Box 1120
Boulevard, CA 91905

Ewiiapaayp Tribal Office
Michael Garcia, Vice Chairperson
4054 Willows Road
Alpine, CA 91901

Sycuan Band of the Kumeyaay Nation
Danny Tucker, Chairperson
5459 Sycuan Road
El Cajon, CA 92021

Kumeyaay Cultural Historic Comm.
Ron Christman
56 Viejas Grade Road
Alpine, CA 92001

Campo Band of Mission Indians
Andrea Najera
Cultural Resources Manager
36190 Church Road, Ste. 1
Campo, CA 91906

Kumeyaay Diegueno Land Conserv.
M. Louis Guassac, Exec. Dir.
P.O. Box 1992
Alpine, CA 91903

Ipai Nation of Santa Ysabel
Clint Linton
P.O. Box 507
Santa Ysabel, CA 92070

CA. Dept. of Fish and Wildlife
South Coast Region
3883 Ruffin Road
San Diego, CA 92123

Manzanita Band of the
Kumeyaay Nation
Leroy J. Elliott, Chairperson
P.O. Box 1302
Boulevard, CA 91905

Army Corps of Engineers, L.A. Dist.
South Coast Branch, Therese Bradford
5900 La Place Court, Suite 100
Carlsbad, CA 92008

CA Dept. of Transportation
District 11
4050 Taylor Street
San Diego, CA 92110

Reg. Water Quality Cont. Board
Region 9, San Diego
2375 Northside Drive, Ste. 100
San Diego, CA 92108-2700

CA Native Amer. Heritage Com.
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691

Dept. of Parks & Recreation
California State Parks
Resource Management Division
P.O. Box 942896
Sacramento, CA 94296-0001

Inter-Tribal Cultural Resources
Protection Council
Frank Brown
240 Brown Road
Alpine, CA 91901

Ipai Nation of Santa Ysabel
Virgil Perez, Spokesman
PO Box 130
Santa Ysabel, CA 92070

Viejas Band of Kumeyaay Indians
Anthony R. Pico, Chairperson
PO Box 908
Alpine, CA 91903

U.S. Dept. of HUD
Field Office Director, Ray Brewer
Los Angeles Field Office
611 W. 6th Street, Suite 801
Los Angeles, CA 90017

Kumeyaay Cult. Repat. Comm.
Bernice Paipa, Vice Spokesperson
PO Box 1120
Boulevard, CA 91905

Save Our Heritage Organization
2476 San Diego Avenue
San Diego, CA 92110

Scott Morgan
Office of Planning & Research
1400 Tenth Street, Room 121
Sacramento, CA 95814