

## 4.3 CULTURAL AND TRIBAL CULTURAL RESOURCES

The analysis in this section of the EIR addresses the potential impacts associated with cultural and tribal cultural resources that could occur due to implementation of the proposed project. The following discussion includes information based on the Cultural Resources Survey for the Alvarado Creek Specific Plan (RECON 2018a), which is included as Appendix D of this EIR, and the Historic Resource Analysis Report (Urbana Preservation & Planning, LLC [Urbana] 2019), which is included as Appendix E of this EIR.

### 4.3.1 Existing Conditions

#### 4.3.1.1 Cultural Resource Definitions

Archaeological resources include prehistoric and historic locations or sites where human actions have resulted in detectable changes to the area. This can include changes in the soil, as well as the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both. Historic archaeological resources are those originating after European contact. These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures.

Historical resources are physical features, both natural and constructed, that reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a timeframe of at least the last 10,000 years and include both the prehistoric and historic periods.

A Tribal Cultural Resource is defined as a site, feature, place, cultural landscape, sacred place, or object, which is of cultural value to a Tribe, and is either on or eligible for listing in the national, state, or a local historic register, or the lead agency, at its discretion, chooses to treat the resource as a Tribal Cultural Resource (PRC Section 21074).

#### 4.3.1.2 Cultural Setting

##### Prehistoric Period

In San Diego County, the prehistoric cultural sequence generally comprises three distinct periods: the Paleoindian, the Archaic, and the Late Prehistoric. The Paleoindian dates the earliest of the three periods, between about 11,500 and 8,500 years ago, and is most closely associated with the San Dieguito Complex. This period placed a large emphasis on hunting and is characterized by scraper planes, choppers, scraping tools, crescentics, elongated bifacial knives, and leaf-shaped points.

The Paleoindian Period is then followed by the Archaic Period, lasting from approximately 8,500 to 1,500 years ago. The Archaic Period is associated with the La Jollan Complex along the coast and the Pauma Complex inland. The period largely focused on a generalized economy and emphasized seed resources, small game, and shellfish. Items emerging during the Archaic Period include rough cobble-based choppers and scrapers, slab and basin metates, and large side-notched and Elko series projectile points.

The Archaic Period is followed by the Late Prehistoric, beginning approximately 1,500 years ago. This period is associated with the Cuyamaca Complex and is characterized by higher population densities and elaborations in social, political, economic, and technological systems. Items associated with the Cuyamaca Complex include steatite arrowshaft straighteners, steatite pendants, steatite comales (heating stones), Tizon Brownware pottery, ceramic figurines reminiscent of Hohokam styles, ceramic “Yuman bow pipes”, ceramic rattles, miniature pottery, various cobble-based tools (e.g., scrapers, choppers, hammerstones), bone awls, manos and metates, mortars and pestles, and Desert side-notched and Cottonwood Series projectile points.

### **Ethnohistory**

The project area is located within the traditional territory of the Kumeyaay, also known as Ipai, Tipai, or Diegueño, who occupied the southern region of San Diego County. The Kumeyaay lived in semi-sedentary, politically autonomous villages or rancherías. Their settlement system typically consisted of two or more seasonal villages surrounded by temporary camps. The most basic social and economic unit was the patrilocal extended family. The Kumeyaay were largely focused on hunting and gathering, specifically of resources such as small game, acorns, grass seeds, and other plant resources. Items typically associated with the Kumeyaay include a shoulder-height bow for hunting, mortars and pestles, and flaked stone tools such as scrapers, choppers, flake-based cutting tools, and biface knives. Additionally, the Kumeyaay made fine baskets using either coiled or twined construction, and both brown utility and decorated pottery using the paddle-and-anvil technique.

### **Historic Period**

There are three general eras in California history: the Spanish, Mexican, and American periods.

The Spanish Period lasted from 1769 to 1821 and was characterized by European exploration and settlement. Settlement and development of Spanish colonies was incentivized by giving large land grants to prominent individuals as part of the rancho system. Military naval forces along with a religious contingent founded the San Diego Presidio, the pueblo of San Diego, and the San Diego Mission. As a result of the European settlement, Native American culture in the coastal strip of California rapidly deteriorated.

The Spanish Period was followed by the Mexican Period, which began when Mexico declared its independence from Spain in 1821. The Mexican Period is noted for secularizing the previously religious mission system and allowing for the vast expansion of the rancho system, which caused the southern California economy to become largely based on cattle ranching. The Mexican Period ended in 1848 when Mexico signed the Treaty of Guadalupe Hidalgo on February 2 of that year, concluding the Mexican-American War.

American governance began in 1848, when Mexico signed the Treaty of Guadalupe Hidalgo, ceding California to the United States at the conclusion of the Mexican–American War, which marked the start of the American Period. A great influx of settlers to California and the San Diego region occurred during the American Period, resulting from several factors, including the discovery of gold in California, the end of the Civil War, the availability of free land through passage of the Homestead Act, and later, the importance of San Diego County as an agricultural area supported by roads, irrigation systems, and connecting railways. The increase in American and European populations quickly overwhelmed many of

the Spanish and Mexican cultural traditions, and greatly increased the rate of population decline among Native American communities.

### **La Mesa History**

La Mesa was originally part of the Rancho de la Mission San Diego de Alcalá, consisting of 58,875 acres and extending from the Pueblo of San Diego to El Cajon in the east, Clairemont Mesa in the north, and National City in the south. The Rancho supported the mission until secularization in 1834 and was then placed under the administration of Joaquin Ortega the following year. In 1845, the lands were deeded to Don Santiago Arguello.

In 1868, Robert Allison purchased the land that now comprises La Mesa for the purpose of ranching. The discovery of gold in the eastern mountains (near what is now Julian), in addition to the construction of a flume to bring water down from the Cuyamaca Mountains, helped to foster the growth of La Mesa and caused a large boost to development in the area. The San Diego Flume Company formed in 1886 and raised capital by selling land along present-day El Cajon Boulevard between College Avenue and Garfield Street. Robert Allison also donated 100 one-acre lots in the La Mesa town site to the Flume Company for sale to raise money for the flume construction. In 1887, Robert Allison purchased construction bonds and granted a right-of-way to the San Diego, Cuyamaca, and Eastern Railroad Company. By 1890, service was available from Lakeside to San Diego, with a stop at the Allison Springs Station located in what would become the downtown La Mesa area.

La Mesa incorporated in 1912, and in the early 1900s, the economy of La Mesa expanded to include agriculture and citrus orchards with packing warehouses, health resorts, and a film production company named the American Film Manufacturing Company. At this time, University Avenue was the main road for traveling east and west between San Diego and La Mesa, and development was concentrated adjacent to it. During World War I, El Cajon Boulevard was constructed, and development shifted north along the El Cajon Boulevard corridor. As with the entire San Diego region, development in La Mesa slowed during the Great Depression but resurged during World War II and continued into the 1950s. To support the growing population, residential tracts, schools, and shopping centers were constructed. Transportation expanded in the 1950s and 1960s as well, including the construction of SR 94, SR 125, Fletcher Parkway, and the expansion of US Highway 80. The Grossmont shopping center opened in 1961, which initially drew much business away from the downtown area, but this trend has reversed in subsequent years as new businesses have moved into the old downtown area.

#### **4.3.1.3 History of the Project Site**

The project site remained undeveloped until 1954 when Chris A. Cosgrove, a pioneer builder and developer in San Diego County, constructed a mobile home park called the La Mesan. The La Mesan initially included 118 spaces over approximately 7.7 acres and was expanded to include 49 additional spaces over approximately four acres in subsequent years. By 1958, the property included 167 spaces over approximately 11.86 acres and was later expanded to 181 spaces. The site reflected standard mobile home parks, which were initially created in the early 1930s to serve as short-term and highly mobile forms of housing, but quickly shifted into more permanent housing in the post-World War II era. Mobile home parks created a sense of instant communities for people in the decades following World War II.

Between 1954 and 1959, the project site was developed with eight buildings comprising a restroom and laundry building, a two-story office building, a comfort station, a lounge and rumpus room building with a sky room, a proprietor's residence, a utility building, a drafting office, and a lath house. Recreational facilities were also constructed, including a swimming pool with patio, shuffleboard and badminton courts, a fenced children's playground, a private terrace, and barbeque. The La Mesan mobile home park incorporated all of the character-defining features of a post-World War II resort park: private paved roads; numerous mobile home spaces with concrete pads and hookups for electricity, gas, water, and sewage; a recreational Club House (with office and changing rooms); a manager's residence; a laundry room; community bathroom facilities; a swimming pool; and landscaping. By 1990, the mobile home park was converted into an RV resort and all of the mobile homes were removed. The RV resort remains the current use of the site and contains six of the original eight buildings, the swimming pool, a spa, and 181 concrete slabs (for RV parking) arranged along 13 asphalt-covered streets.

## **4.3.2 Regulatory Setting**

### **4.3.2.1 Federal**

#### **National Historic Preservation Act**

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

#### **National Register of Historic Places**

The NHPA established the National Register of Historic Places (NRHP) as the official federal list of cultural resources that have been nominated by state offices for their significance at the local, state, or federal level. The NRHP is the official lists of sites, buildings, structures, districts, and objects significant in American history, architecture, archaeology, engineering, and culture. Listing in the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) in the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing in the NRHP. The NRHP is administered by the National Park Service. Nominations to the NRHP may come from the various State Historic Preservation Offices, Tribal Historic Preservation Offices, local governments, and from private individuals and organizations.

Criteria for listing in the NRHP are stated in 36 CFR 60.4. A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association; and where the resource meets at least one of the following criteria:

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

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological resources. These criteria have largely been incorporated into the CEQA Guidelines (Section 15065.5) as well.

### **Native American Graves Protection and Repatriation Act**

The Native American Graves Protection and Repatriation Act (NAGPRA; U.S.C., Title 25, Sections 3001 et seq.) is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.

#### **4.3.2.2 State**

##### **California Register of Historic Resources**

Similar to the NRHP, the California Register of Historic Resources (CRHR) program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies resources for planning purposes; determines eligibility of state historic grant funding; and provides certain protections under CEQA. State criteria are those listed in CEQA and used to determine whether an historic resource qualifies for the CRHR. A resource may be listed in the CRHR if it is significant at the federal, state, or local level under one or more of the following four criteria:

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

In addition to meeting one of the above criteria, a resource eligible for CRHR listing must retain integrity, meaning it must evoke the resource's period of significance or, in the case of criterion 4, it may be disturbed but must retain enough intact and undisturbed deposits to make a meaningful data contribution to regional research issues.

### **CEQA Guidelines Section 15064.5**

CEQA Guidelines Section 15064.5 provides guidance on determining the significance of impacts to archaeological and historical resources. The term "historical resources" is defined as a resource listed in or determined eligible for listing on the CRHR; a resource included in a local register of historical resources or identified as significant in a historical resource survey that meets certain requirements; and any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant. Archaeological resources are considered "historical resources" for the purposes of CEQA.

A resource that is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historic resources, or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA (Section 15064.5 and CEQA Statutes Section 21083.2).

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

### **California Native American Graves Protection and Repatriation Act**

The California NAGPRA (2001), like the federal act, ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations.

### **California Health and Safety Code, Section 7050.5**

California Health and Safety Code Section 7050.5 specifies protocol for the inadvertent discovery of human remains. In the event of discovery or recognition of any human remains, disturbance of the site shall halt and remain halted until the County coroner has conducted an investigation into the circumstances, manner, and cause of any death, and has provided recommendations concerning the treatment and disposition of the human remains. If the County coroner determines that the human remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact the NAHC by telephone within 24 hours.

### **California Public Resources Code Section 5097**

California PRC Section 5097 et seq., Native American Historic Resource Protection Act; Archaeological, Paleontological, and Historical Sites; Native American Historical, Cultural, and Sacred Sites specifies the procedures to be followed in the event of the unexpected discovery of human remains on non-federal

public lands. California PRC Section 5097.9 states that no public agency or private party on public property shall “interfere with the free expression or exercise of Native American Religion.” The code further states that:

No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine... except on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, except for parklands larger than 100 acres.

### **Assembly Bill 52**

Assembly Bill (AB) 52 (Chapter 532, Statutes of 2014) was passed on September 25, 2014, and applies to all projects that file a Notice of Preparation or Notice of Intent to Adopt a Negative Declaration, Mitigated Negative Declaration or EIR, on or after July 1, 2015. The bill requires that a lead agency begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a project if that tribe has requested, in writing, to be kept informed of projects by the lead agency, prior to the determination of whether a negative declaration, mitigated negative declaration, or EIR will be prepared. The bill also specifies mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources.

AB 52 codified this consultation process within the CEQA statute (PRC Section 20174). It also defines tribal cultural resources as either of the following:

- a. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
  - Included or determined to be eligible for inclusion in the CRHR.
  - Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

### **Senate Bill 18**

Native American involvement in the planning and development review process is addressed by several state laws. The most notable of the state laws is SB 18, which includes detailed requirements for local agencies to consult with identified California Native American tribes early in the planning and/or development process. These consultation and notice requirements apply to adoption and amendment of general plans and specific plans.

### 4.3.2.3 Local

#### City of La Mesa General Plan

The Historic Preservation Element of the adopted General Plan (City 2012a) includes multiple policies and objectives relating to the project. Objective HP-1.1 is to broaden the awareness of the La Mesa Historic Preservation Program. This is supported by Policy HP-1.1.1, to share information between the City and preservation advocacy organizations, and Policy HP-1.1.2, to inform citizens and project applicants of preservation regulations as part of the development review process. Objective HP-1.2 is to update and maintain the La Mesa Historic Resources Inventory to identify the potential eligibility of properties built in the historic era. This is supported by Policy HP-1.2.1, to implement a phased Historical Resource Survey program to account for all locations in the City classified within the historic era, and Policy HP-1.2.2, to establish guidelines for identifying eligible properties in the Modern Period, extending from 1935 to 1975 in the City of La Mesa. The La Mesa Historic Resources Inventory designates local historic and cultural resources, and consists of the overall Historic Resources Inventory, the Potential Landmark Listing, and the Historic Landmark Register.

#### City of La Mesa Historic Preservation Ordinance

La Mesa Municipal Code Title 25, Historic Preservation, enacts the goals of the Historic Preservation Element of the City of La Mesa General Plan. The Historic Preservation Commission was created by Municipal Code Section 25.01.060, which also established their powers and responsibilities. The Historic Landmark and Historic District Designation Criteria are both identified in Municipal Code Section 25.03.010. The ordinance states that a cultural resource may be recommended for designation as a Historic Landmark or Historic District if it meets one or more of the following criteria:

- Criterion A: It exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, or architectural history;
- Criterion B: It is identified with persons or events significant in local, state, or national history;
- Criterion C: It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;
- Criterion D: It is representative of the notable work of an acclaimed builder, designer, or architect;
- Criterion E: It is identified with a person or persons or groups who significantly contributed to the culture and development of the City;
- Criterion F: It embodies elements of outstanding attention to architectural design, detail, materials or craftsmanship;
- Criterion G: It is an archeological or paleontological site which has the potential of yielding information of scientific value; or
- Criterion H: It is a geographically definable area possessing a concentration of sites, buildings, structures, improvements, or objects linked historically through location, design, setting, materials, workmanship, feeling, and/or association, in which the collective



value of the improvements may be greater than the value of each individual improvement.

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

### **4.3.3 Methodology and Assumptions**

A Cultural Resources Survey (RECON 2018a) and a Historical Resource Analysis Report (Urbana 2019) were prepared for the project, which are provided as Appendices D and E of this EIR. As part of the Cultural Resources Survey, site records searches were conducted through the California Historical Resources Information System, South Coastal Information Center (SCIC) at San Diego State University. Additionally, a field survey of the project area was conducted. The surveyed areas included the majority of the 12.36-acre project site and a 1.30-acre off-site impact area. The portion of the project within the Alvarado Creek channel was not walked but was visually inspected wherever possible from the edge of the channel. Landscaped and bare dirt areas in the developed portion of the property were inspected closely for any indication of cultural materials. Ground visibility in these areas varied considerably, with some grass-covered areas having no ground visibility, and areas between trees and bushes having excellent ground visibility.

The NAHC was contacted on July 11, 2017 for a Sacred Lands File search and list of Native American contacts, which were received on July 13, 2017. Letters were sent to tribal representatives identified by the City and the NAHC in September 2019 informing them of the proposed project and asking them of any knowledge or information about cultural resources they may have about the project area. One response was received by the Viejas Band of Kumeyaay Indians on October 2, 2019 indicating that Viejas has cultural ties to the project site. No consultation was requested, however, a Kumeyaay cultural monitor was requested to be present during ground disturbing construction activities.

The Historical Resource Analysis Report consisted of research and a field survey of historic-era buildings (i.e., those greater than 45 years old) on the project site. The research resources included United States census records; digitized copies of the San Diego Union; La Mesa City Directories; City of La Mesa building permits; San Diego County Assessor records, including the Grantor-Grantee Index and the Commercial-Industrial Building Record; La Mesa Historical Society archives; and historic aerial imagery on file at the San Diego History Center, HistoricAerials.com, and the University of California Santa Barbara Library. The field survey was conducted on August 15, 2019 and included both photographs of the property boundaries and notes on existing conditions, architectural features, and observed modifications of existing on-site historic-era buildings.

### **4.3.4 Significance Thresholds**

According to Appendix G of the CEQA Guidelines, a significant impact associated with cultural and tribal cultural resources would occur if implementation of the proposed project would result in any of the following:

1. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

2. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?
3. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
  - a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
  - b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

### 4.3.5 Impact Analysis

#### 4.3.5.1 Historical Resources

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

Based on the results of the records search, no historic archaeological resources have been recorded within or adjacent to the project site. One recorded historical resource (P-37-035910) is located within 0.5 mile of the project site, which is a pump station consisting of two small single-story buildings in a Spanish Eclectic architectural style that were constructed by the City of San Diego between 1941 and 1953. Implementation of the project would not impact this recorded resource.

During the field survey, no previously recorded historic resources were observed on or near the site. However, the six existing on-site buildings were constructed in the 1950s as part of the original RV resort development, dating them at over 45 years old. As such, the buildings were evaluated for eligibility for listing on the CRHR and designation as a City of La Mesa Historic Landmark.

The Historical Resource Analysis Report (Urbana 2019) indicates that the existing buildings were constructed between 1954 and 1959 and that there were originally eight buildings, including a two-story office building, a lounge and rumpus room building, a proprietor's residence, a drafting office, restroom and laundry building, a utility building, a comfort station, and a lath house. As shown in Table 4.3-1, *Project Site Buildings*, six of the original eight buildings are still currently on the site; the comfort station was not identified during the field survey and the lath house is no longer standing. Each of the six existing buildings are described below followed by a CRHR/La Mesa Historical Landmark eligibility analysis.

**Table 4.3-1  
PROJECT SITE BUILDINGS**

Historic Name	Common Name	Year Built
Office Building	Office and TV Room/Billiards Building	1954
Lounge and Rumpus Room Building	Fitness Center Building	1954
Proprietor's Residence	Apartment Building	1954
Drafting Office	Meeting Room Building	1958
Restroom and Laundry Building	Restroom and Laundry Building	1954
Utility Building	East Restroom and Laundry Building	1957
Comfort Station	N/A <sup>1</sup>	1954
Lath House	N/A <sup>2</sup>	1959

Source: Urbana 2019

<sup>1</sup> Not identified during the field survey.

<sup>2</sup> No longer standing.

N/A = Not Applicable

The Office and TV Room/Billiards Building, historically identified as the Office Building, has a very low-pitched side-gable roof with wide overhanging eaves, overhanging and cantilevered second-story walls, stucco-clad exterior walls, and composition shingle roofing. Fenestration includes metal-framed windows with wood sills, wood-framed windows, and wood-framed doors installed around the perimeter at both levels. Two open concrete staircases with metal railing are installed at the north and south exteriors. The building is set back from the street (Alvarado Road) and is west of the swimming pool. The ground floor breezeway, a distinctive element of the building, has been infilled. The painted or neon sign originally installed on the building's roof is no longer present and has been replaced by a sign advertising "Sunland RV Resort San Diego." Additionally, the original decorative masonry screen wall enclosing the pool area has been replaced by metal fencing.

The Fitness Center Building, historically identified as the Lounge and Rumpus Room Building, is a two-story building with a flat roof and wide overhanging eaves with a sweeping curve extending from the northeast corner to the southeast corner. Features include stucco wall surfaces, horizontal wood siding, smooth stucco with slightly protruding large squares on the first floor, a 2-foot by 18-foot glass bay on the second floor of the north elevation, and smooth flush wood-framed doors.

The Apartment Building, historically identified as the Proprietor's Residence, is a compound plan, two-story building with a low-pitched side-gable roof, wide overhanging eaves, and solar panels. Features include stucco wall surfaces, a bowed wall surface on the north elevation, metal framed windows, and wood framed doors. A wood-covered porch and a concrete staircase are present on the second floor of the west elevation, and five square wood posts and a concrete staircase are present on the east elevation.

The Meeting Room Building, historically identified as the Drafting Office, is south of the Office and TV Room/Billiards Building. The Meeting Room Building is a one-story building with a rectangular plan and angled walls on the northeast and southeast corners, a flat roof, and wide overhanging eaves. Features include stucco wall surfaces, metal-framed windows with wood molding, and wood-framed doors. Four large metal mailboxes are centered on the west elevation.

The Restroom and Laundry Building is located on the west portion of the property. This building is a one-story building with a rectangular plan and has a low-pitched front-gable roof, wide overhanging

eaves, and composition shingles. Features include stucco wall surfaces, horizontal sliding metal-framed windows, and smooth flush wood-framed doors.

The East Restroom and Laundry Building, historically identified as the Utility Building, is located on the east side of Alvarado Creek on the east portion of the property. The building is a one-story building with a rectangular plan, a low-pitched front-gable roof, wide overhanging eaves, and composition shingles. Features include stucco wall surfaces, horizontal sliding metal-framed windows, and smooth flush wood-framed doors.

These six remaining buildings on the site only reflect a portion of the site's original use. The original mobile homes and features were removed, so the property no longer represents an intact mobile home park design that offered affordable housing options for long-term local occupants and snowbirds amid a wave of residential growth in the post-World War II period. Although six remaining buildings are still standing, the site no longer conveys an association with the development of post-World War II mobile home parks in the San Diego region. Additionally, while the site's builder, Chris A. Cosgrove, is regarded as a Master Builder for some of his work, the current site is not regarded as a masterful representation of his work as a builder. The property was laid out in a manner consistent with mobile home parks throughout the country, and has lost many of its original character-defining features, such as the mobile homes, monumental roof signage, landscape features, shuffleboard and badminton courts, and patios, barbeques, and storage units for each trailer. The current property would not appear to yield information that could be regarded as important to local, regional, state, or national history, and is not considered an archeological or paleontological site at this time. For these reasons, the San Diego RV Resort does not meet the CRHR or La Mesa Historic Landmark eligibility criteria (as identified in Sections 4.3.2.2 and 4.3.2.3, respectively) and thus, is ineligible for listing on the CRHR and ineligible for designation as a City of La Mesa Historic Landmark. Accordingly, the property does not meet the definition of an historical resource pursuant to Section 15064.5 of the CEQA Guidelines. Demolition and removal of the buildings, structures, and site features at the proposed property would not result in a substantial adverse change in the significance of a historical resource. Impacts to historical resources would be less than significant.

#### **4.3.5.2 Archaeological Resources**

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

The Cultural Resources Survey conducted for the project site included a SCIC records search for an area that included the project site and a one-half mile radius around it. No recorded prehistoric archaeological resources are listed on the project site or within the one-half mile radius buffer. Additionally, no prehistoric archaeological resources were observed on or near the site during the field survey. The project site, however, is located within the Alvarado Creek floodplain and consequently, there is potential that unknown prehistoric material has been buried by streambed deposits from periodic flooding of the creek. It is possible that construction-related subsurface grading and trenching activities may uncover buried unknown archaeological resources. In the event that subsurface archaeological resources are encountered during construction, such resources could potentially be damaged or destroyed, resulting in a substantial adverse change in the significance of an archaeological resource. As a result, implementation of the proposed project could result in a potentially significant impact to archaeological resources.

### 4.3.5.3 Tribal Cultural Resources

*Threshold 3: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or*
- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

The Sacred Lands File check from the NAHC indicated that no known sacred lands or Native American cultural resources have been identified within the project area and as stated above in Section 4.3.5.2, the SCIC records search did not identify any known prehistoric cultural resources on or within 0.5 mile of the project site and none were observed during the field survey.

In accordance with the requirements of PRC Section 21080.3.1, AB 52, and SB 18, the City of La Mesa notified Native American tribes that are traditionally and culturally affiliated with the project area. The tribes were sent notification letters in September 2019 informing them of the proposed project and asking them of any knowledge or information about tribal cultural resources they may have about the project area. No specific tribal cultural resources were identified by the tribes and no requests for consultation were received. One response was received by the Viejas Band of Kumeyaay Indians on October 2, 2019 indicating that Viejas has cultural ties to the project site. No consultation was requested; however, a Kumeyaay cultural monitor was requested to be present during ground disturbing construction activities.

Based on the NAHC Sacred Lands Files, SCIC records search, field survey, and Native American outreach, no tribal cultural resources are known to occur in the project area. However, there is potential for unknown buried tribal cultural resources to be present given the site's location within the Alvarado Creek floodplain. Project construction could encounter unknown tribal cultural resources during subsurface grading and trenching activities that may have been buried by streambed deposits from periodic flooding of Alvarado Creek. If encountered, such resources could potentially be damaged or destroyed, resulting in a substantial adverse change in the significance of a tribal cultural resource. Therefore, implementation of the proposed project could result in a potentially significant impact to tribal cultural resources.

## 4.3.6 Mitigation Measures

### 4.3.6.1 Historical Resources

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

#### 4.3.6.2 Archaeological Resources

Implementation of the proposed project could result in a potentially significant impact to unknown archaeological resources. Implementation of mitigation measure CUL-1 would reduce this impact to a below a level of significance.

**CUL-1 Archaeological and Native American Construction Monitoring.** Prior to the issuance of grading permits, the owner/permittee shall prepare a cultural resources monitoring program that shall be reviewed and approved by the City's Community Development Department. The monitoring program shall include the retention of a qualified archaeologist and a Native American (NA) monitor. The archaeological and NA monitors shall attend a pre-construction meeting with the construction manager and be in attendance during initial ground disturbing activities at the project site. The monitors shall determine the extent of their presence during soil disturbing activities.

The archaeological and NA monitors shall have the authority to temporarily halt or redirect grading and other ground-disturbing activity if cultural resources are encountered. If an artifact is encountered, all operations in the area where the artifact was found shall be suspended immediately, the City shall be notified, and a qualified archaeologist shall be retained by the owner/permittee to evaluate, in consultation with the NA monitor, the significance of the find; to salvage, record, clean, and curate significant artifact(s); and to document the find in accordance with current professional archaeological standards. Within 30 days of completion of ground-disturbing activities, either a letter signed by the archaeological and NA monitors stating that no artifacts were found or, if artifacts were found, a report prepared by the qualified archaeologist and NA monitor documenting the mitigation program shall be submitted to the City.

#### 4.3.6.3 Tribal Cultural Resources

Implementation of the proposed project could result in a potentially significant impact to unknown tribal cultural resources. Implementation of mitigation measure CUL-1 identified above would reduce this impact to a below a level of significance.

#### 4.3.7 Significance Determination

The significance of cultural resources impacts before and after mitigation is summarized in Table 4.3-2, *Significance Determination Summary of Cultural and Tribal Cultural Resources Impacts*. Impacts related to historical resources would be less than significant, and no mitigation is required. Implementation of the proposed project, however, would result in potentially significant impacts related to archaeological and tribal cultural resources. With implementation of mitigation measure CUL-1, these impacts would be reduced to below a level of significance.

**Table 4.3-2**  
**SIGNIFICANCE DETERMINATION SUMMARY OF CULTURAL AND TRIBAL CULTURAL RESOURCES IMPACTS**

<b>Issue</b>	<b>Significance Before Mitigation</b>	<b>Mitigation Measure</b>	<b>Significance After Mitigation</b>
Historical Resources	Less than significant	None required	Less than significant
Archaeological Resources	Potentially significant	CUL-1	Less than significant
Tribal Cultural Resources	Potentially significant	CUL-1	Less than significant

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