

Appendix C: Cultural Resources Supporting Information

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C-1: Phase I Cultural Resources Assessment

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**Phase I Cultural Resources Assessment
676 Moss Street Project
City of Chula Vista, San Diego County, California**

USGS Imperial Beach 7.5' Quadrangle
La Nación Land Grant

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MANAGEMENT SUMMARY

The 676 Moss Street Project (project) is located within the City of Chula Vista, County of San Diego, California (Exhibit 1). The project is situated in the northeast corner of Industrial Boulevard and Moss Street. The mailing address is 676 Moss Street. The site is located on low-lying coastal land in an unsurveyed portion of the United States Geological Survey (USGS) Imperial Beach 7.5' Quadrangle (Exhibit 2). The generally flat landscape on and in proximity to the project is heavily populated with commercial and residential development (Exhibit 3).

The project proposes the construction of 132 multifamily dwelling units on the 6.92-acre parcel. At present, the parcel is occupied by several commercial enterprises.

FirstCarbon Solutions (FCS) conducted records searches, background research, and a site visit and documented those efforts with this report.

The South Coastal Information Center (SCIC) conducted a records search for the project, including the project site and a 0.5-mile buffer (Appendix A). According to the results of the records search, the property has never been the subject of a cultural resources investigation. No historic or prehistoric sites are recorded on the parcel, but several have been recorded within the 0.5-mile buffer, including the railroad line adjacent to the project.

The Native American Heritage Commission (NAHC) conducted a Sacred Lands File review, which returned negative results. A list of Native American tribes affiliated with the area was provided by the NAHC. FCS notified the tribes of the project and requested they provide any information they may have regarding cultural resources in the area. As of the date of this report, no responses have been received (Appendix B).

The field visit and a review of historic aerials (Historicaerials.com) studies indicate that there appear to be two structures within the project boundary that have reached a sufficient age to be evaluated as potential historical resources. The structures should be evaluated by an architectural historian to determine if the structures meet local, State, or national criteria to be determined historic resources. The results of the investigation will be submitted in a Technical Report supporting the Environmental Impact Report (EIR). The existing buildings at 676A and 676B Moss Street are 45 years of age or older. These will require an evaluation to determine if they merit listing on the California Register of Historic Resources (CRHR).

The paleontological records search indicates that the property is situated in an area that possesses high paleontological sensitivity. If project excavation activities extend deep enough to encounter previously undisturbed deposits that contain paleontological resources the implementation of a complete paleontological resource mitigation program during ground-disturbing activities is recommended. However, if it is determined that the thickness of the low sensitivity surficial sediments underlying the project site exceeds the maximum cut depths proposed for construction of the project, paleontological mitigation is not recommended.

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Source: Census 2000 Data, The CaSIL

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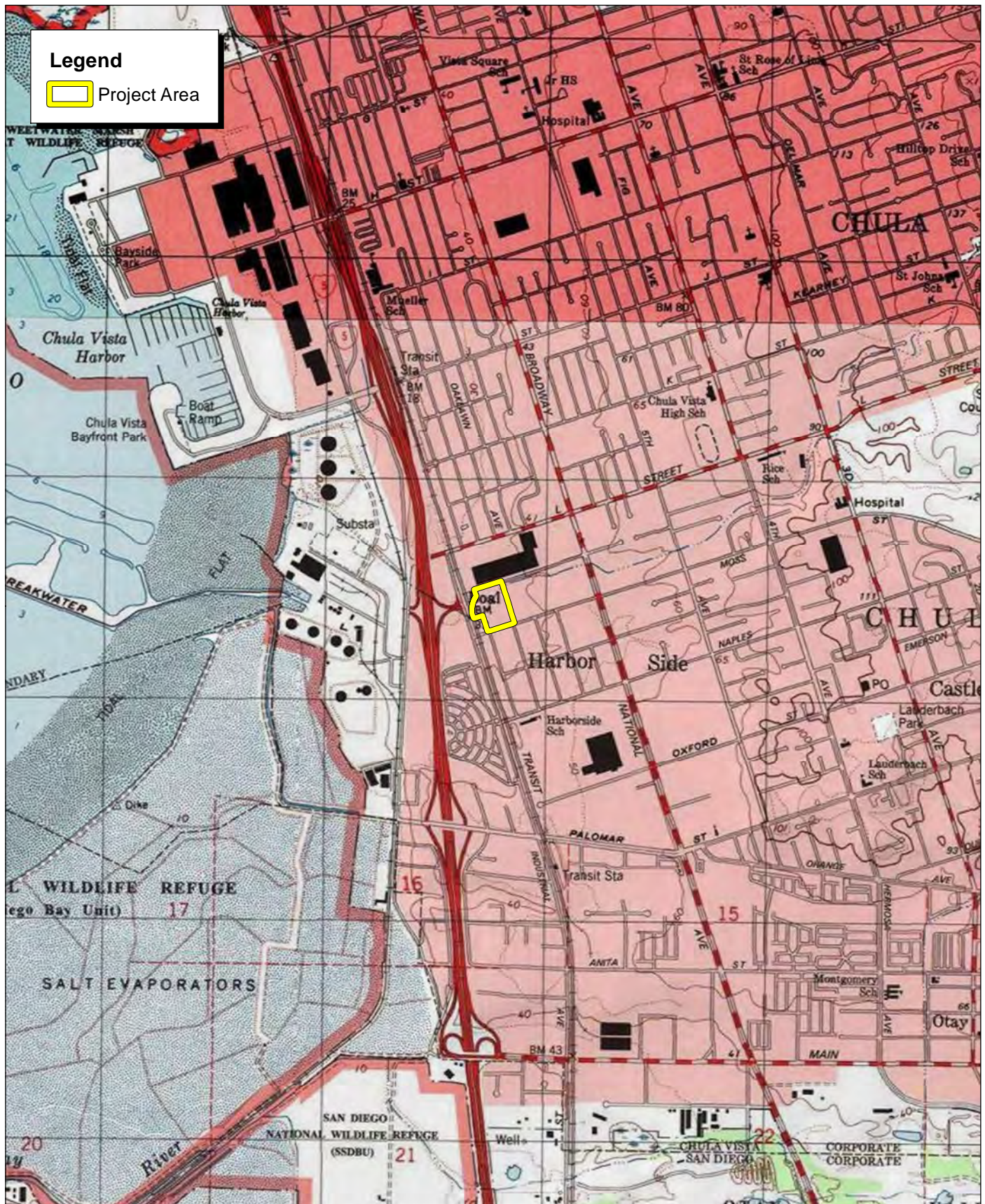


5 2.5 0 5
Miles

Exhibit 1

Regional Location Map

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Source: USGS Imperial Beach 7.5' Quadrangle / Land Grant: La Nacion

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2,000 1,000 0 2,000
Feet

Exhibit 2

Local Vicinity Map
Topographic Base

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Source: ESRI Aerial Imagery.

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Exhibit 3 Local Vicinity Map Aerial Base

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SECTION 1: INTRODUCTION

1.1 - Project Location and Description

The proposed project is located within the City of Chula Vista, County of San Diego, California. The project is situated in the Southern California Coastal Zone. The site is located on low-lying coastal land, which is a generally flat landscape now heavily populated with commercial and residential development. The project proposes to construct 132 multifamily dwelling units on a 6.92-acre parcel. At present, the parcel is occupied by several commercial enterprises.

1.2 - Natural Setting

The City of Chula Vista is a largely built-out, mixed high-density residential and commercial community located along the coastline of the Pacific Ocean in southern San Diego County. Clusters of urbanized higher density developments are scattered throughout its central portion, generally along major roads. The native vegetation in the region consists of coastal sage/scrub populations as well as marsh and bay populations, with occasional stands of oaks and other indigenous tree species populating the low hills to the east.

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SECTION 2: CULTURAL SETTING

Following is a brief overview of the prehistory, ethnography, and historic background, providing a context in which to understand the background and relevance of sites found in the general project area. This section is not intended to be a comprehensive review of the current resources available; rather, it serves as a general overview.

Further details can be found in ethnographic studies, mission records, and major published sources, including Beardsley (1948), Bennyhoff (1950), Fredrickson (1973), Kroeber (1925), Chartkoff and Chartkoff (1984), and Moratto (1984).

2.1 - Prehistoric Background

Fagan (2003), Moratto (1984), and Chartkoff and Chartkoff (1984) provide recent overviews of California archaeology and historical reviews of the inland Southern California coast, among other locales. The most accepted regional chronology for coastal Southern California is from Wallace's four-part Horizon format (1955), which was later updated and revised by Warren (1968) and most recently by Chartkoff and Chartkoff (1984). The latter modified the term "Period" to "Horizon," a term more common among researchers today. Created to place temporal structure upon materialistic phases observed during archaeological syntheses, the advantages and weaknesses of Southern California chronological sequences are reviewed by Warren (in Moratto 1984), Chartkoff and Chartkoff (1984), and Heizer (ed. 1978).

2.1.1 - Early Man

Spanning the period from approximately 17,000 to 9,500 years Before Present (BP), archaeological assemblages attributed to the Early Man Period are characterized by large projectile points and scrapers. The limited data available suggests that prehistoric populations focused on hunting and gathering, moving about the region in small nomadic groups. Technologies associated with ocean resource gathering would have likely been utilized, but the sea level during this period was lower than today, meaning that sites on the coast are inundated and unavailable for study. Californians of this Period were viewed as populations of big-game hunters that were mobile enough to pursue herds. The entirety of California may have been occupied near the beginning of the Holocene epoch, about 11,750 years ago. During the Holocene, sea levels rose about 60 meters between 11,750 and 7,000 BP, due to melting of the Pleistocene ice sheet in the higher latitudes. Although the sea level was about 120 meters lower off the coast of California roughly 22,000 years ago (Milne et al. 2005), sea level stabilization began about 7,000 years ago and only a slight rise has occurred since then.

Pleistocene flora and fauna are regularly uncovered from sediments at the La Brea Tar Pits, deep construction-related excavations in coastal Orange County, and in the Santa Ana watershed. Such studies reinforce the idea that much of Southern California exhibited a climate similar to that of Monterey or the San Francisco Bay area during this Period (Chartkoff and Chartkoff 1984), with slightly drier conditions away from the coast.

2.1.2 - Millingstone

As part of the slow restabilization effect of the melting continental ice sheet, rising sea levels, and other environmental changes up to the end of the Early Man Period, the Southern California climate became warmer and drier. Known as the Altithermal, Fagan (2003) notes that after 8,500 BP, the climate of most of California became warmer and much drier, and remained so for 4,000 years.

Native groups altered their subsistence characteristics to compensate. Characterized by the appearance of handstones and millingsstones that would have been used to grind seeds, the Millingstone Period tentatively dates to between 9,500 and 3,000 BP. Artifact assemblages in early Millingstone sites reflect an emphasis on foraging subsistence systems. Because shrubby vegetative communities replaced the temperate forest, native populations would likely have shifted to seasonal rounds to take advantage of new patterns of seed ripening. Little is known about the types of cultural changes that would be needed, but the types of artifacts seen during this Period can suggest the subsistence systems.

Artifact assemblages typically included choppers and scraper planes, with a general lack of projectile points. Large projectile points began to appear in the late portion of the Millingstone Period, which suggests the development of a more diverse economy. The distribution of Millingstone sites reflects the theory that aboriginal groups may have followed a modified central-based wandering settlement pattern. In this semi-sedentary pattern, a base camp would have been occupied for a portion of the year, but small population groups seasonally occupied subsidiary camps in order to exploit resources not generally available near the base camp. Sedentism apparently increased in areas possessing an abundance of resources that were available for longer periods. Arid inland regions would have provided a more dispersed and sporadic resource base, further restricting sedentary occupations to locations near permanent water. The duration and intensity of encampment occupations increased, especially in the latter half of the Period in the coastal areas. Huge shell mounds near coastal habitats indicated more intensive sedentism after 5,000 BP (Fagan 2003), suggesting an increase in population.

2.1.3 - Intermediate

Dating between 3,000 and 1,250 BP, the Intermediate Period represents a transitional era. Excavated assemblages retain many attributes of the Millingstone Period but with more elaborate and diverse artifact types in these deposits. Additionally, Intermediate Period sites can contain large-stemmed or notched small projectile points suggestive of bow and arrow use, especially near the end of the period, and the use of portable grinding tools continues. Intensive use of mortar and pestles signaled processing of acorns as the primary vegetative staple as opposed to a mixed diet of seeds and acorns. Because of a general lack of data, neither the settlement and subsistence systems nor the cultural evolution of this Period are well understood, but it is very likely that the nomadic ways continued. It has been proposed that sedentism increased with the exploitation of storable food resources, such as acorns, but coastal sites from the Period exhibit higher fishing activity than in previous periods. The first permanently occupied villages make their appearances in this Period/Horizon (Chartkoff and Chartkoff 1984).

2.1.4 - Late Prehistoric

Extending from 1,250 BP to Spanish Contact in 1769, the Late Prehistoric Period reflects a slight increase in technological sophistication and diversity. Exploitation of marine resources continued to intensify. Assemblages characteristically contain projectile points and toward the end of the Period the size of the points decreased and notched and stemmed bases appeared, which implies the use of the bow and arrow. Use of personal ornaments, such as shell beads, was widely distributed east of the coast, suggesting well-organized and codified trade networks. Additional assemblages in this Period/Horizon included steatite bowls, asphaltum, grave goods, and elaborate shell ornaments. The use of bedrock milling stations was widespread during this Horizon. Increased hunting efficiency and widespread exploitation of acorns provided reliable and storable food resources. Village size increased during this time, with some of these villages potentially having held 1,500 persons or more (Chartkoff and Chartkoff 1984). Analyses of skeletons showed that the first signs of malnutrition appeared in this Period, signaling greater competition for food resources (Fagan 2003).

The earliest part of this Period may have seen an incursion of Cupan-Takic speakers from the Great Basin country (the so-called “Shoshonean wedge” of Kroeber 1925), who may have replaced the Hokan speakers in the area. At the time of Spanish conquest, Cupan-Takic speakers were located in Orange County, western Riverside County, and the Los Angeles Basin (Gabrieliño, Juaneño, and Cahuilla peoples). Serran-Takic speakers are now represented by the Serranos in the San Bernardino Mountains. Recent work (O’Neil 2002) has concluded that the “Shoshonean wedge” is misnamed—the original Los Angeles inhabitants replaced by the incoming Cupan-Takic speakers may have actually been Yuman speakers (similar to those in the California Delta region of the Colorado River) and not Hokan Salinan-Seri (Chumash) speakers, as was suggested by Kroeber.

At the time of Spanish conquest, local indigenous groups were composed of constantly moving and shifting clans and cultures. Early ethnographers applied the concept of territorial boundaries to local indigenous groups purely as a conceptualization device, and the data were based on fragmented information provided to them from second-hand sources.

2.2 - Native American Background

2.2.1 - Tipai/Ipai

Among the native people of San Diego County and Northern Baja California, there is a certain resolve to identify them as a culture group, separate in identity from other Southern Californian tribes and bands. These native people, known today as the Kumeyaay, are unlike other native groups in that they have had their regional habitation split by the border of Mexico and the United States. The Kumeyaay have been known by many names, according to their descendants and their history. They previously were designated by prehistoric terms of culture related to regional geography within San Diego and Baja, California, specifically Tipai south of the border, and Ipai on the coast and mountain regions. Later during the Spanish occupation within San Diego County, the Kumeyaay were coined “Diegueño.” In many references the Diegueño are also designated by geography, coastal, mountain, or desert. A significant aspect of the Kumeyaay prehistory is that they did not build typical house structures but simple shelters. Kumeyaay structures were dwellings built only for the winter and

located at low elevations. Ceremonial structures were built for permanence and considered as owned by the village, and a typical summer home required only a windbreak or was located under trees. Most villages were only seasonal campsites, and a married couple, children, and occasionally guests shared a dwelling.

2.2.2 - Luiseño

Of all the Southern California native groups, the Luiseño have been the most ethnographically studied with literature rich in detail. The Luiseño occupational areas encompass over 1,500 square miles of Southern California (Bean and Shipek 1978; Kroeber 1925) as well as the Channel Islands (Sparkman 1908). Luiseño villages were found along the Pacific Ocean from just north of Agua Hedionda to south of Aliso Creek in present-day San Diego County and moved inland from these points to the western base of the San Jacinto River and south to the valley of San José, near Fallbrook (Bean and Shipek 1978). The villages were determined according to their proximity to a defined water source, access to a food gathering locale, and whether they were in a good defensive location (Bean and Shipek 1978). Spatially, these villages were commonly located along valley bottoms, streams, or coastal strands. The Luiseño characteristically lived in sedentary villages; therefore, one clan or family occupied several food-gathering locations and aggressively guarded these areas against other clans (Bean and Shipek 1978; Sparkman 1908; Strong 1972).

Luiseño homes were constructed in two forms, one for larger construction and one for a smaller home style. The larger variations were typically constructed with forked posts supporting wood ceiling beams and were completely covered in thatch, which was lightly mixed with sand or soil (Bean 1978; Kroeber 1925). The smaller home style had a slightly conical roof made of some locally available brush, with a floor that was usually excavated 2 feet below ground surface. All homes were built with a small fire pit in the center and a slight smoke hole in the roof just above the fire (Bean 1978; Bean and Shipek 1978; Kroeber 1925). Sweat houses were of a thatch design similar to that of the smaller home pattern, but varied in construction in that they stood on two forked posts connected by a log and were shaped like an ellipse, with an entrance on one of the longer sides of the structure.

The pottery associated with the Luiseño is made for functionality; it was simply constructed and lacked ornamental design, although Bean and Shipek (1978) note that if designs were included, “a simple line decoration was either painted or incised with a fingernail or stick.” The Luiseño made pots from the basis of a coil form, in which pieces of coiled clay are gradually added to the edge of the pot, while it is being shaped with a wooden paddle and finished with a polishing stone. After completion, the pot is sunbaked and fired (Sparkman 1908). Typical uses of pottery included cooking, water jugs, containers, and a water vessel with two spouts used while gathering food (Sparkman 1980). Plant fibers were also commonly used for purposeful household implements, such as brooms, brushes, nets, pouches, twine, and cedar bark skirts for women. The process of creating such items from plant fiber tends to rely on soaking, stretching, and then rolling the fiber (Sparkman 1908; Bean and Shipek 1978).

Ceremony and ritual was of great importance to all native peoples, and the Luiseño had their own variety of traditional practices. Frequently practiced ceremonies included multiple rituals for

mourning the dead, the eagle dance, separate ceremonies for the initiation of boys and girls, and a summer and winter solstice celebration (Kroeber 1925; Sparkman 1908; Strong 1972). These ceremonies offered gatherers an opportunity to witness reenactments, songs, and the oral recitation of their history (Garbarino and Sasso 1994). Important equipment during rituals included blades made of obsidian, stone bowls, clay figurines, and headdresses constructed of eagle feathers (Bean and Shipek 1978). Ritual dances were limited to three standard dances, such as the fire dance, which was used during the Toloache Cult initiation for boys at puberty. Also of great significance during the boys' initiation were masterfully designed sand paintings, once thought to have originated in the Southwest, though presently culturally identified with the Luiseño (Bean and Shipek 1978; Garbarino and Sasso 1994; Kroeber 1925). Although not necessarily limited to ritual, Heizer and Whipple (1971) comment that the Luiseño of Riverside County decorated their rock designs in the same form as that of the native peoples of the Great Basin, which appeared as pecked abstracts displayed on boulders.

Personal adornment was a common practice among the Luiseño. Ornamental items such as beads and pendants were made of clay, shell, stone, deer hooves, bear claws, and mica sheets. Men would wear ear and nose ornaments, sometimes made of bone or cane with beads attached. Body painting and tattooing were done purely for rituals (Bean and Shipek 1978).

2.3 - Historic Background

In 1542, a fleet of three small ships commanded by Juan Rodriguez Cabrillo sailed into San Diego Harbor. These explorations led the Spanish to claim the land. In 1795, Chula Vista became a part of a Spanish land grant known as Rancho del Rey or "The King's Ranch." When Mexico formed its own government in 1831, Rancho del Rey became known as Rancho de la Nación or National Ranch. The ranch encompassed the areas now known as National City, Chula Vista, Bonita, Sunnyside, and the Sweetwater Valley. Rancho de la Nación was used by the Spanish as grazing land for their cattle and horses until 1845, when it was granted to John Forster, the son-in-law of Mexican governor Pio Pico.

The United States claimed California following the Mexican-American war in 1847. Even though California became a state in 1850, land grants were allowed to continue as private property under American law.

Forster continued to operate the ranch for ten years, when he sold it to a French developer. The land was again sold to the Kimball brothers in 1868 for \$30,000. Frank, Warren, and Levi Kimball intended to develop the land into productive American-style cities and farms. Frank Kimball is also responsible for bringing the Santa Fe Railroad to San Diego, with its first terminus in National City.

In 1888, the Sweetwater Dam was completed to bring water to Chula Vista residents and their farming lands. Frank Kimball became the State Commissioner of Agriculture and discovered citrus trees to be the most successful crop for the area. Chula Vista eventually became the largest lemon-growing center in the world for a period of time.

A railroad was built to connect San Diego, National City, Chula Vista, and Otay. This railroad, known as the National City and Otay Railroad, flourished for many years.

World War II ushered in changes that would affect the City of Chula Vista forever. The principal reason was the relocation of Rohr Aircraft Corporation to Chula Vista in early 1941, just months before the attack on Pearl Harbor. Rohr employed 9,000 workers in the area at the height of its wartime production. With the demand for housing, the land never returned to being orchard groves. The population of Chula Vista tripled from 5,000 residents in 1940 to more than 16,000 in 1950.

After the war, many of the factory workers and thousands of servicemen stayed in the area, resulting in the huge growth in population. During those years, numerous schools, homes, banks, restaurants, gas stations, and shopping centers opened to accommodate the growing number of residents. The last of the citrus groves and produce fields disappeared as Chula Vista became one of the largest communities in San Diego (City of Chula Vista 2018).

SECTION 3: RESULTS

3.1 - Record Searches

3.1.1 - South Coastal Information Center

The California Historical Resources Information System maintains regional information centers in California that archive archaeological, historical, and other cultural resources documents. The SCIC—located on the campus of San Diego State University in San Diego, California—maintains data for San Diego and Imperial Counties.

SCIC conducted a records search and literature review for the project on December 12, 2018. The results of the records search indicate that three historic sites and one prehistoric isolated occurrence have been recorded near, but not on, the project site (Table 1).

Table 1: Known Cultural Resources within a 0.5-mile Radius of the Project Site

Site Number	Distance from Project Area	Resource Description
P-37-004886	< 0.5 mile	Isolated occurrence of chert scraper
P-37-013073	<0.5 mile	Coronado Railroad
P-37-025680	< 0.5 mile	Various railroad features (rails, depot, crossing)
P-37-026582	<0.5 mile	Western Salt Works (ponds, etc.)

The SCIC also has documents on file pertaining to 15 cultural resource investigations conducted within a 0.5-mile radius of the project area (Table 2). These investigations consist primarily of archaeological surveys, historic surveys, and historic and prehistoric evaluations. None of these studies appear to have included any portion of the project site.

Table 2: Cultural Resources Reports within a 1 Mile Radius of the Project Site

Report Number	Author/Date	Title
SD-00304	Carrico, Richard and Lesley C. Eckhardt. 1978	Cultural Resources Reconnaissance of the San Diego Fixed Guideway Project Centre City to San Ysidro
SD-00497	Corum, Joyce M. 1978	An Archaeological Survey Report for the Proposed San Diego Bay Route Bikeway (Harbor Drive to Coronado), 112-12-185301.
SD-00798	Eckhardt, William T. 1978	Archaeological Test and Data Recovery Program at Telegraph Canyon, Chula Vista, California
SD-00983	Gross, Tim 1975	A Cultural Impact Survey of Telegraph Canyon Creek San Diego County, California

Table 2 (cont.): Cultural Resources Reports within a 1 Mile Radius of the Project Site

Report Number	Author/Date	Title
SD-05134	Dolan, Christy	Historic Property Surveys Report for the Palomar Street Improvement Project, San Diego County, Chula Vista, California
SD-05507	Wade, Sue, Stephen R. Van Wormer, and Dayle M. Cheever (1990)	Historic Properties Inventory for Secondary Treatment, Clean Water Program for Greater San Diego, San Diego, California (DEP No. 89-0744)
SD-08036	Pletka, Nicole (2002)	Cultural Resource Assessment AT&T Wireless Services Facility No. 10087C, San Diego County, California
SD-08964	Bevil, Alexander D. (2001)	San Diego and Arizona Eastern Railway Coronado Branch Line Right-of Way: California Register Nomination
SD-10051	Taniguchi, Christeen, and Wayne Bonner (2004)	Record Search and Site Visit Results for Cingular Telecommunications Facility Candidate SD857-04 (Toys R Us), 1008 Industrial Boulevard, Chula Vista, San Diego County, California
SD-11125	Kyle, Carolyn E. (2006)	Treatment Plan for the San Diego Gas & Electric Silvergate Transmission Substation Project San Diego County, California
SD-11476	May, Ronald V. (2003)	Coronado Railroad, City of San Diego/Metropolitan Transit Development Board (LDR 40-0378)
SD-12678	Rosen, Martin and Kevin Hovey (2010)	Historic Property Survey Report for the Sandag Bayshore Bikeway
SD-14106	Davis, Shannon, Sarah Stinger-Bowsher, Jennifer Krintz, and Sinead Ni Ghabhlain (2012)	Final Historic Resources Survey, Chula Vista, California
SD-16552	Davis, Shannon (2012)	Phase One Report, Historic Resources Reconnaissance Survey, Chula Vista, California
SD-17233	Brunzell, David (2017)	San Diego 129 Project, San Diego County, California (BCR Consulting Project No. SYN1622)

3.1.2 - Paleontology Record Search

FCS requested a records search of the paleontological records by staff at the San Diego Natural History Museum (SDNHM) in November 2018. On November 7, 2018, FCS received the records search from the museum via email (Appendix C).

According to the records search, the project is located in an area not known to contain fossil-bearing sediments:

A review of published geological maps covering the Project site and surrounding area was conducted to determine the specific geologic units underlying the Project.

Each geologic unit was subsequently assigned a paleontological resource sensitivity following County of San Diego guidelines (Deméré and Walsh, 1993; Stephenson et al., 2009). Published geological reports covering the Project area (e.g., Kennedy and Tan, 2008) indicate that the proposed Project has the potential to impact late Pleistocene- to Holocene-age young alluvial flood plain deposits, and could also impact the underlying Pleistocene-age Bay Point Formation. These geologic units and their paleontological sensitivity are summarized in detail in the following section.

In addition, a search of the paleontological collection records housed at the SDNHM was conducted in order to determine if any documented fossil collection localities occur at the Project site or within the immediate surrounding area (Figure 1). The SDNHM does not have any recorded fossil localities within one mile of the Project site. According to SDNHM:

The entire Project site is underlain at the surface by late Pleistocene- to Holocene-age young alluvial flood plain deposits (mapped as Qya by Kennedy and Tan, 2008), which line modern drainages. Young alluvial flood plain deposits are generally considered to be less than 10,000 years old, and range in composition from unconsolidated to moderately consolidated silt, sand, pebbly and cobbly sand, and boulders. No fossils are currently known from these deposits in the vicinity of the Project site. These deposits are assigned a low paleontological sensitivity based on their relatively young geologic age and lack of recorded fossil collection localities. However, within the Project site, these deposits appear to overlie the Bay Point Formation (high paleontological sensitivity, see below). The actual depth of the contact between surficial deposits and the underlying older, high paleontological sensitivity strata is not precisely known, and may occur as shallow as 5 feet below existing surface grade. This depth threshold represents a conservative approach to predicting where impacts to more deeply buried paleontological resources may occur in the subsurface. However, a deeper threshold between low and high paleontological sensitivity strata may be appropriate for larger drainages where thicker deposits of young sediments are more likely to have accumulated.

The nearshore marine deposits of the Pleistocene-age (approximately 10,000 to 750,000 years old) Bay Point Formation appear to underlie young alluvial flood plain deposits at unknown depths within the Project site. The SDNHM does not have any fossil collection localities from the Bay Point Formation within a 1 mile radius of the Project site. Elsewhere in western San Diego County, the Bay Point Formation has yielded large and diverse assemblages of marine invertebrate fossils, as well as less common fossilized remains of marine invertebrates (e.g., sharks, ray, and bony fish). The Bay Point Formation has been assigned a high paleontological sensitivity for the diverse and well-preserved fossils of marine invertebrates and marine vertebrates that have been recovered from these deposits.

The high paleontological sensitivity of the Bay Point Formation in San Diego County (Deméré and Walsh 1993; Stephenson et al., 2009) suggests the potential for

construction of the Project to result in impacts to paleontological resources. Any proposed excavation activities that extend deep enough to encounter previously undisturbed deposits of this geologic unit have the potential to impact the paleontological resources preserved therein, and, in this case, implementation of a complete paleontological resource mitigation program during ground-disturbing activities is recommended. However, if it is determined that the thickness of the low sensitivity surficial sediments underlying the Project site exceeds the maximum cut depths proposed for construction of the Project, paleontological mitigation is not recommended.

3.1.3 - Native American Heritage Commission Record Search

On October 26, 2018, FCS sent a letter to the NAHC in an effort to determine whether any sacred sites are listed on its Sacred Lands File for the project. The response from the NAHC was received on December 21, 2018, and it indicated that the search of the Sacred Lands File was negative for cultural resources. A list of eight Native American tribal members who may have additional knowledge of the project area was included with the results. These tribal members were sent letters on December 26, 2018, asking for any information they might have concerning cultural resources on or near the project area. As of the date of this report, no responses have been received.

3.1.4 - Pedestrian Survey

FCS Archaeologist, Damien Tietjen, conducted a site visit for the project on December 18, 2018. A review of historic aerials (Historicaerials.com) conducted in advance of the site visit indicated that two of the structures are at least 45 years of age and will require evaluation by a qualified architectural historian. The two structures are located at 676A and 676B Moss Street. Images of the structures are located in Appendix D. The FCS Archaeologist was not allowed access to the property; therefore, photos were taken from positions located outside the facility. The property is completely developed.

SECTION 4: SUMMARY AND RECOMMENDATIONS

4.1 - Archaeological/Paleontological Mitigation Measures Recommendations

The records search indicates that no prehistoric archaeological sites are located near the project. The entire project area is built out and no native soils are exposed. There is a possibility that buried or otherwise obscured prehistoric materials or historic materials could be present in a subsurface context. A qualified Archaeologist shall be retained by the Project Applicant to be present and to monitor during all ground-disturbing activities. Ground-disturbing activities include primary construction-related activities and any associated secondary activities for support services such as utilities. In the event that archaeological resources are identified during monitoring or unexpectedly during excavations in fill sediments, all work proximal to the discovery shall halt until the qualified Archaeologist has evaluated the find and determined whether the find is a “unique cultural resource” as defined in Section 21083.2(g) of the CEQA statutes. If the find is prehistoric or includes Native American materials, affiliated Native American groups shall be invited to contribute to a treatment plan. Results of monitoring and any archaeological treatment shall be reported in an appropriate technical report to be filed with the Project Applicant, the City of Chula Vista, and the SCIC. The Project Applicant, in consultation with the City of Chula Vista and Archaeologist, shall designate repositories (e.g. museums) in the event that resources are recovered.

The high paleontological sensitivity of the Bay Point Formation in San Diego County suggests the potential for project construction to result in impacts to paleontological resources. Any proposed excavation activities that extend deep enough to encounter previously undisturbed deposits of this geologic unit have the potential to impact the paleontological resources preserved therein, and, in this case, implementation of a complete paleontological resource mitigation program during ground-disturbing activities is recommended. However, if it is determined that the thickness of the low sensitivity surficial sediments underlying the project site exceeds the maximum cut depths proposed for construction of the project, paleontological mitigation is not recommended.

4.2 - Historic Evaluation Mitigation Measures Recommendations

A review of historic aerials (Historicaerials.com) indicated that there appear to be two structures within the project boundary that have reached a sufficient age to be evaluated as potential historical resources. An intensive-level investigation will be undertaken, with the result of a site visit and archival research used to determine if the structures have met local, State, or national criteria to be determined historic resources. The results of the investigation will be submitted in a Technical Report supporting the EIR.

4.2.1 - Accidental Discovery of Cultural Resources

It is always possible that ground-disturbing activities during construction will uncover previously unknown, buried cultural resources. In the event that buried cultural resources are discovered during construction, operations shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The

qualified archaeologist shall make recommendations to the lead agency on the measures that shall be implemented to protect the discovered resources including, but not limited to, excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Potentially significant cultural resources consist of but are not limited to stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project area should be recorded on appropriate Department of Parks and Recreation forms and evaluated for significance in terms of CEQA criteria.

4.2.2 - Accidental Discovery of Human Remains

There is always the small possibility that ground-disturbing activities during construction may uncover previously unknown buried human remains. Should this occur, federal laws and standards apply, including the Native American Graves Protection and Repatriation Act and its regulations found in the Code of Federal Regulations (43 CFR 10).

In the event of an accidental discovery or recognition of any human remains, California State Health and Safety Code Section 7050.5 dictates that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to CEQA Section 15064.5 and Public Resources Code (PRC) Section 5097.98.

SECTION 5: REFERENCES

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References

- O'Neil, S. 2002. The Acjachemen in the Franciscan Mission System: Demographic Collapse and Social Change. Master Thesis, Department of Anthropology, CSU-Fullerton.
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- Warren, C.N. 1968. "Cultural Tradition and Ecological Adaptation on the Southern California Coast." Archaic Prehistory in the Western United States, C. Irwin-Will. Washington, DC: Smithsonian Institution.

Appendix A: South Coastal Information Center Records Search

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South Coastal Information Center
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-5320
Office: (619) 594-5682
www.scic.org
nick@scic.org

CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM RECORDS SEARCH

Company: First Carbon Solutions

Company Representative: David Smith

Date Processed: 12/12/2018

Project Identification: Chula Vista Residential -3426.0024.0

Search Radius: 1/2 mile

Historical Resources: YES

Trinomial and Primary site maps have been reviewed. All sites within the project boundaries and the specified radius of the project area have been plotted. Copies of the site record forms have been included for all recorded sites.

Previous Survey Report Boundaries: YES

Project boundary maps have been reviewed. National Archaeological Database (NADB) citations for reports within the project boundaries and within the specified radius of the project area have been included.

Historic Addresses: YES

A map and database of historic properties (formerly Geofinder) has been included.

Historic Maps: YES

The historic maps on file at the South Coastal Information Center have been reviewed, and copies have been included.

Summary of SHRC Approved CHRIS IC Records Search Elements

RSID:	2540
RUSH:	no
Hours:	1
Spatial Features:	19
Address-Mapped Shapes:	yes
Digital Database Records:	19
Quads:	1
Aerial Photos:	0
PDFs:	Yes
PDF Pages:	212

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SD-00304	NADB-R - 1120304; Voided - CARRICO 61	1978	Carrico, Richard and Lesley C Eckhardt	Cultural Resources Reconnaissance of the San Diego Fixed Guideway Project Centre City to San Ysidro	WESTEC Services, Inc.	37-000003, 37-000004, 37-000035, 37-000036, 37-000037, 37-000038, 37-000041, 37-000042, 37-000043, 37-000052, 37-000053, 37-000054, 37-000055, 37-000056, 37-000144, 37-000202, 37-000239, 37-000767, 37-004571, 37-004611, 37-004642, 37-004643, 37-004646, 37-004675, 37-004933, 37-004934, 37-004956, 37-004957, 37-004958
SD-00497	NADB-R - 1120497; Other - 11212- 185301; Voided - CORUM 15	1978	Corum, Joyce M.	An Archaeological Survey Report for the Proposed San Diego Bay Route Bikeway (Harbor Drive to Coronado) 112-12-185301.	CALTRANS	37-000003, 37-000055, 37-000056, 37-000057, 37-000058, 37-000059, 37-000065, 37-000767, 37-004360, 37-004636, 37-004642, 37-004958
SD-00798	NADB-R - 1120798; Other - DACW 09-78- M-1700; Voided - ECKHARDW14	1978	Eckhardt, William T.	Archaeological Test and Data Recovery Program at Telegraph Canyon, Chula Vista, California	WESTEC Services, Inc.	
SD-00983	NADB-R - 1120983; Voided - GROSS 10	1975	Gross, Tim	A Cultural Impact Survey of Telegraph Canyon Creek San Diego County, California	San Diego State University	
SD-05134	NADB-R - 1125134; Voided - DOLAN10	1999	Dolan, Christy	Historic Property Surveys Report for the Palomar Street Improvement Project, San Diego County, Chula Vista, California	Christy Dolan	37-017656
SD-05507	NADB-R - 1125507; Other - R-1835G; Voided - WADE78	1990	WADE, SUE, STEPHEN R. VAN WORMER, and DAYLE M. CHEEVER	Historic Properties Inventory for Secondary Treatment, Clean Water Program for Greater San Diego, San Diego, California (DEP No. 89-0744)	RECON	
SD-08036	NADB-R - 1128036; Voided - PLETKA 13	2002	NICOLE PLETKA	CULTURAL RESOURCE ASSESSMENT AT&T WIRELESS SERVICES FACILITY NO. 10087C SAN DIEGO COUNTY, CALIFORNIA	LSA	
SD-08964	NADB-R - 1128964; Voided - BEVIL22	2001	BEVIL, ALEXANDER D.	SAN DIEGO & ARIZONA EASTERN RAILWAY CORONADO BRANCH LINE RIGHT-OF-WAY: CALIFORNIA REGISTER NOMINATION	SAVE OUR HERITAGE ORGANIZATION	37-013073
SD-10051	NADB-R - 1130051; Voided - BONNEW07	2004	Christeen Taniguchi and Wayne Bonner	Record Search and Site Visit Results for Cingular Telecommunications Facility Candidate SD857-04 (Toys R Us) 1008 Industrial Boulevard, Chula Vista, San Diego County, California	Michael Branman Associates	

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SD-11125	NADB-R - 1131125; Voided - KYLE333	2006	KYLE, CAROLYN E.	TREATMENT PLAN FOR THE SAN DIEGO GAS & ELECTRIC SILVERGATE TRANSMISSION SUBSTATION PROJECT SAN DIEGO COUNTY, CALIFORNIA	KYLE CONSULTING	
SD-11476	NADB-R - 1131476; Voided - MAYR113	2003	MAY, RONALD V.	CORONADO RAILROAD, CITY OF SAN DIEGO / METROPOLITAN TRANSIT DEVELOPMENT BOARD (LDR 40-0378)	LEGACY 106, INC.	
SD-12678	NADB-R - 1132678; Voided - ROSEN140	2010	ROSEN, MARTIN and KEVIN HOVEY	HISTORIC PROPERTY SURVEY REPORT FOR THE SANDAG BAYSHORE BIKEWAY	CALTRANS	
SD-14106	NADB-R - 1134106; Voided - DAVIS103	2012	DAVIS, SHANNON, SARAH STINGER-BOWSER, JENNIFER KRINTZ, and SINEAD NI GHABHLAIN	FINAL HISTORIC RESOURCES SURVEY, CHULA VISTA, CALIFORNIA	ASM AFFILIATES, INC.	
SD-16552	NADB-R - 116552	2012	DAVIS, SHANNON	PHASE ONE REPORT, HISTORIC RESOURCES RECONNAISSANCE SURVEY, CHULA VISTA, CALIFORNIA	ASM Affiliates	
SD-17233	NADB-R - 1137233; Submitter - BCR Project No. SYN1622	2017	BRUNZELL, DAVID	SAN DIEGO 129 PROJECT, SAN DIEGO COUNTY, CALIFORNIA (BCR CONSULTING PROJECT NO. SYN1622)	BCR Consulting LLC	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-004886	CA-SDI-004886						SD-11977
P-37-013073	CA-SDI-013073	Other - Coronado Railroad	Structure	Historic	AH07 (Roads/trails/railroad grades) - railroad grade; AH16 (Other) - railroad tracks, ties; HP19 (Bridge) - railroad bridge	1993 (D. Laylander, Caltrans District 11); 1999 (Andrew R. Pignuolo, Tierra Environmental Services); 2000 (Andrew R. Pignuolo, Tierra Environmental Services)	SD-02714, SD-04555, SD-04737, SD-04743, SD-04756, SD-05057, SD-05059, SD-06160, SD-07415, SD-07422, SD-07427, SD-07806, SD-08140, SD-08248, SD-08964, SD-09348, SD-10933, SD-11977, SD-13024, SD-13191, SD-13476, SD-13852, SD-14030, SD-14032, SD-14313, SD-16547, SD-17151
P-37-025680		Other - San Diego and Arizona Railway; Other - Imperial Highway Railroad Crossing; Other - Evan Hews Highway Railroad Crossing; Other - Silsbee Road Railroad Crossing; Other - San Diego and Arizona Eastern Railway Tracks and Depot; Other - SD&AE; Other - Union Pacific Railroad	Structure	Historic	AH07 (Roads/trails/railroad grades); HP11 (Engineering structure); HP17 (Railroad depot)	2000 (Stephen Wee, Paul Ferrell, JRP Historical Consulting Services); 2005 (D. Iversen, ASM Affiliates); 2006 (Drew Pallette, ASM Affiliaes); 2009 (Sinéad Ni Ghabhláin, Sarah Stringer-Bowsher, ASM Affiliates); 2009 (Brian Williams, ASM Affiliates); 2012 (Adam Giacinto, Scott Wolf, ASM Affiliates); 2013 (B. Comeau, Dudek)	SD-11977, SD-14021, SD-14042, SD-14078
P-37-026582		Other - WSCSW Salt Ponds and Levees/Western Salt Works District; Other - Western Salt Company Salt Works; Other - Western Company Salt Works Hisotric District, Pond 20A	District	Historic	HP04 (Ancillary building); HP08 (Industrial building); HP11 (Engineering structure) - industrial machinery; HP21 (Dam) - levees; HP22 (Lake/river/reservoir) - salt ponds; HP23 (Ship) - floating dredge	2001 (Carrie Gregory, Angie Gustafson, EDAW); 2012 (Adam Giacinto, Dudek)	SD-11977, SD-13852, SD-15289, SD-17151

Appendix B: Cultural Resources Correspondence

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Sacred Lands File & Native American Contacts List Request

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd, Suite 100
West Sacramento, CA 95501
(916) 373-3710
(916) 373-5471 – Fax
nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: _____

County: _____

USGS Quadrangle

Name: _____

Township: _____ Range: _____ Section(s): _____

Company/Firm/Agency:

Contact Person: _____

Street Address: _____

City: _____ Zip: _____

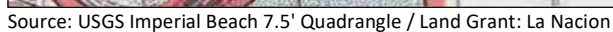
Phone: _____ Extension: _____

Fax: _____

Email: _____

Project Description:

____ Project Location Map is attached



Local Vicinity Map
Topographic Base

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100 West Sacramento, CA 95691 Phone: (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



December 21, 2018

David M. Smith
First Carbon Solutions

VIA Email to: dsmith@fcs-intl.com

RE: Chula Vista Residential Project, San Diego County

Dear Mr. Smith:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at my email address: katy.sanchez@nahc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Katy Sanchez".

KATY SANCHEZ
Associate Environmental Planner

Attachment

**Native American Heritage Commission
Native American Contacts List
12/21/2018**

La Jolla Band of Luiseno Indians Thomas Rodriguez, Chairperson 22000 Highway 76 Pauma Valley CA 92061 (760) 742-3771 (760) 742-3779 Fax	Luiseno	Rincon Band of Luiseño Indians Bo Mazzetti, Chairperson 1 West Tribal Road Valley Center CA 92082 bomazzetti@aol.com (760) 749-1051 (760) 749-5144	Luiseno
Pala Band of Mission Indians Shasta Gaughen, PhD, THPO PMB 50, 35008 Pala Temecula Rd. Pala CA 92059 sgaughen@palatribe.com (760) 891-3515 (760) 742-3189 Fax	Luiseno Cupeno	San Luis Rey Band of Mission Indians Tribal Council 1889 Sunset Drive Vista CA 92081 cjmojado@slrmissionindians.org (760) 724-8505 (760) 724-2172 Fax	Luiseno
Pala Band of Mission Indians Robert H. Smith, Chairperson 12196 Pala Mission Road Pala CA 92059 rsmith@palatribe.com (760) 891-3500 (760) 742-3189 Fax	Luiseno Cupeno	Soboba Band of Luiseno Indians Joseph Ontiveros, Cultural Resource Department P.O. BOX 487 San Jacinto CA 92581 jontiveros@soboba-nsn.gov (951) 663-5279 (951) 654-4198 Fax	Luiseno Cahuilla
Pauma Band of Luiseno Indians Temet Aguilar, Chairperson P.O. Box 369 Pauma Valley CA 92061 (760) 742-1289, Ext. 303 (760) 742-3422 Fax	Luiseno		
Pechanga Band of Luiseño Indians Mark Macarro, Chairman P.O. Box 1477 Temecula CA 92593 epreston@pechanga-nsn.gov (951) 770-6000 (951) 695-1778 Fax	Luiseno		

This list is current as of the date of this document and is based on the information available to the Commission on the date it was produced.

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

This list is only applicable for contacting local Native American Tribes for the proposed: Chula Vista Residential Project, San Diego County.

December 26, 2018

San Luis Rey Band of Mission Indians
Tribal Council
1889 Sunset Drive
Vista, CA 92081

Subject: Moss Street and Industrial Boulevard Residential Project

Dear Tribal Council,

FirstCarbon Solutions (FCS) is conducting a cultural resources assessment for the subject project.

The Moss Street and Industrial Boulevard Residential Project (Project) is located within the City of Chula Vista, County of San Diego, California (Exhibit 1). The project is situated in the northeast corner of Industrial Boulevard and Moss Street. The mailing address is 676 Moss Street. The site is located on low-lying coastal land in an unsurveyed portion of the USGS Imperial Beach 7.5' Quadrangle (Exhibit 2). The generally flat landscape on and in proximity to the project is heavily populated with commercial and residential development.

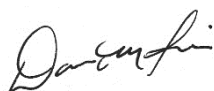
The project proposes the construction of 132 multi family dwelling units on the 6.92-acre parcel. At present, the parcel is occupied by several commercial enterprises.

To determine the presence or absence of cultural and historical resources within the proposed project area and a ½ mile radius, FCS requested a records search from the South Central Coastal Information Center (SCCIC) to identify any historic or prehistoric properties or resources. The SCCIC also reviewed the current inventories of the National Register of Historic Places (NR), the California Register of Historic Resources (CR), the California Historical Landmarks list (CHL), the California Points of Historical Interest (CPHI) list, and the California State Historic Resources. A pedestrian survey was also conducted at the subject property. The property is entirely developed and no soils were visible during the field visit.

If you have any additional information regarding potential historic or cultural resources in proximity or relation to the proposed subject property, we would greatly appreciate your input.

Please note that this letter is a request for information pertaining to a cultural resources assessment and is not notification of a project under Senate Bill (SB) 18, Assembly Bill (AB) 52 or Section 106 of the National Historic Preservation Act. Project notification and consultation requirements are being handled by designated lead agencies under CEQA and NEPA. Please feel free to contact me at 714-508-4100 or via email at dsmith@fcs-intl.com and thank you for your valuable assistance.

Sincerely,



David M. Smith: Project Manager, Archaeology
FirstCarbon Solutions
250 Commerce, Suite 250
Irvine, California 92602

UNITED STATES

Irvine
250 Commerce, Suite 250
Irvine, CA 92602

Los Angeles
11755 Wilshire Blvd, Suite 1660
Los Angeles, CA 90025

Bay Area
1350 Treat Boulevard, Suite 380
Walnut Creek, CA 94597

Central Valley
7265 N First Street, Suite 101
Fresno, CA 93720

Inland Empire
650 E. Hospitality Lane, Suite 125
San Bernardino, CA 92408

Sacramento
915 Highland Pointe Drive, Suite 250
Roseville, CA 95678

Connecticut
1175 Post Road E
Westport, CT 06880

EUROPE

United Kingdom
Tel: +44 (0) 845.165.6245
Fax: +44 (0) 20.3070.0890
Future Business Centre
Kings Hedges Rd.
Cambridge CB4 2HY
United Kingdom

AUSTRALIA

New South Wales
Tel: +61 (02) 9418.7822
Fax: +61 (02) 9418.7833
13-15 Smith Street
Chatswood, NSW 2067
Australia

AFRICA

Kenya
Tel: +254-737-433-621
ADEC Kenya Services EPZ Ltd.
Nairobi, Kenya

ASIA

Philippines
Tel: +63 (2) 775.0632
Fax: +63 (2) 775.0632 local 8050
26th Floor, Philippine AXA Life Centre,
Sen. Gil Puyat Avenue,
Makati City, Metro Manila

Malaysia

Tel: +603 74902112
Fax: +603 79606977
15-7, Block A, Jaya ONE
72A Jalan Universiti
46200 Petaling Jaya
Selangor, Malaysia

Enc: Exhibit

UNITED STATES

Irvine
250 Commerce, Suite 250
Irvine, CA 92602

Los Angeles
11755 Wilshire Blvd, Suite 1660
Los Angeles, CA 90025

Bay Area
1350 Treat Boulevard, Suite 380
Walnut Creek, CA 94597

Central Valley
7265 N First Street, Suite 101
Fresno, CA 93720

Inland Empire
650 E. Hospitality Lane, Suite 125
San Bernardino, CA 92408

Sacramento
915 Highland Pointe Drive, Suite 250
Roseville, CA 95678

Connecticut
1175 Post Road E
Westport, CT 06880

EUROPE

United Kingdom
Tel: +44 (0) 845.165.6245
Fax: +44 (0) 20.3070.0890
Future Business Centre
Kings Hedges Rd.
Cambridge CB4 2HY
United Kingdom

AUSTRALIA

New South Wales
Tel: +61 (02) 9418.7822
Fax: +61 (02) 9418.7833
13-15 Smith Street
Chatswood, NSW 2067
Australia

AFRICA

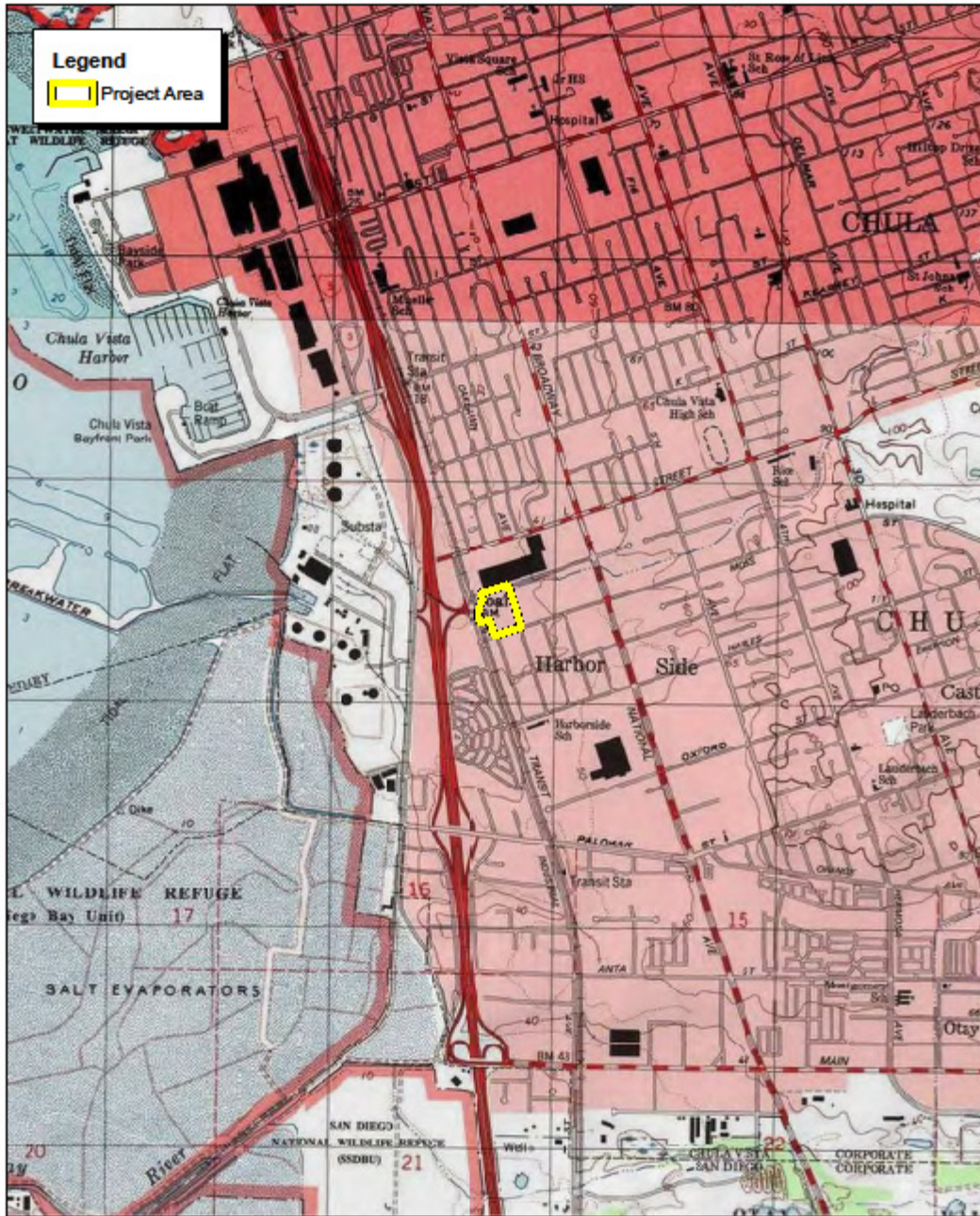
Kenya
Tel: +254-737-433-621
ADEC Kenya Services EPZ Ltd.
Nairobi, Kenya

ASIA

Philippines
Tel: +63 (2) 775.0632
Fax: +63 (2) 775.0632 local 8050
26th Floor, Philippine AXA Life Centre,
Sen. Gil Puyat Avenue,
Makati City, Metro Manila

Malaysia

Tel: +603 74902112
Fax: +603 79606977
15-7, Block A, Jaya ONE
72A Jalan Universiti
46200 Petaling Jaya
Selangor, Malaysia



Source: USGS Imperial Beach 7.5' Quadrangle / Land Grant: La Nacion

Exhibit 2

FIRSTCARBON
SOLUTIONS™



2,000 1,000 0 2,000
Feet

Local Vicinity Map
Topographic Base

34260024 • 10/2018 | 2_local_topo.mxd

SHOPOFF REALTY INVESTMENTS • MOSS & INDUSTRIAL SITE
PHASE I CULTURAL RESOURCES ASSESSMENT

Appendix C: San Diego Natural History Museum Records Search

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SAN DIEGO NATURAL HISTORY MUSEUM

7 November 2018

Mr. David Smith
FirstCarbon Solutions
250 Commerce, Suite 250
Irvine, CA 92602

RE: Paleontological Records Search – Moss & Industrial Site Project

Dear Mr. Smith:

This letter presents the results of a paleontological records search conducted for the Moss & Industrial Site Project (Project), located in the western portion of the City of Chula Vista, San Diego County, CA. The Project site is located southeast of the intersection of Interstate 5 and L Street, and is bordered to the south by Moss Street, to the west by Industrial Boulevard and existing commercial development, and on all other sides by existing residential and light industrial development.

A review of published geological maps covering the Project site and surrounding area was conducted to determine the specific geologic units underlying the Project. Each geologic unit was subsequently assigned a paleontological resource sensitivity following County of San Diego guidelines (Deméré and Walsh, 1993; Stephenson et al., 2009). Published geological reports covering the Project area (e.g., Kennedy and Tan, 2008) indicate that the proposed Project has the potential to impact late Pleistocene- to Holocene-age young alluvial flood plain deposits, and could also impact the underlying Pleistocene-age Bay Point Formation. These geologic units and their paleontological sensitivity are summarized in detail in the following section.

In addition, a search of the paleontological collection records housed at the San Diego Natural History Museum (SDNHM) was conducted in order to determine if any documented fossil collection localities occur at the Project site or within the immediate surrounding area (Figure 1). The SDNHM does not have any recorded fossil localities within one mile of the Project site.

Geologic Rock Units Underlying the Project Area

young alluvial flood plain deposits – The entire Project site is underlain at the surface by late Pleistocene- to Holocene-age young alluvial flood plain deposits (mapped as Qya by Kennedy and Tan, 2008), which line modern drainages. Young alluvial flood plain deposits are generally considered to be less than 10,000 years old, and range in composition from unconsolidated to moderately consolidated silt, sand, pebbly and cobbly sand, and boulders. No fossils are currently known from these deposits in the vicinity of the Project site. These deposits are assigned a low paleontological sensitivity based on their relatively young geologic age and lack of recorded fossil collection localities. However, within the Project site, these deposits appear to overlie the Bay Point Formation (high paleontological sensitivity, see below). The actual depth of the contact between surficial deposits and the underlying older, high paleontological sensitivity strata is not precisely known, and may occur as shallow as 5 feet below existing surface grade. This depth threshold represents a conservative approach to predicting where impacts to more deeply buried paleontological resources may occur in the subsurface. However,

a deeper threshold between low and high paleontological sensitivity strata may be appropriate for larger drainages where thicker deposits of young sediments are more likely to have accumulated.

Bay Point Formation – The nearshore marine deposits of the Pleistocene-age (approximately 10,000 to 750,000 years old) Bay Point Formation appear to underlie young alluvial flood plain deposits at unknown depths within the Project site. The SDNHM does not have any fossil collection localities from the Bay Point Formation within a 1-mile radius of the Project site. Elsewhere in western San Diego County, the Pay Point Formation has yielded large and diverse assemblages of marine invertebrate fossils, as well as less common fossilized remains of marine invertebrates (e.g., sharks, ray, and bony fish). The Bay Point Formation has been assigned a high paleontological sensitivity for the diverse and well-preserved fossils of marine invertebrates and marine vertebrates that have been recovered from these deposits.

Summary and Recommendations

The high paleontological sensitivity of the Bay Point Formation in San Diego County (Deméré and Walsh, 1993; Stephenson et al., 2009) suggests the potential for construction of the Project to result in impacts to paleontological resources. Any proposed excavation activities that extend deep enough to encounter previously undisturbed deposits of this geologic unit have the potential to impact the paleontological resources preserved therein, and, in this case, implementation of a complete paleontological resource mitigation program during ground-disturbing activities is recommended. However, if it is determined that the thickness of the low sensitivity surficial sediments underlying the Project site exceeds the maximum cut depths proposed for construction of the Project, paleontological mitigation is not recommended.

If you have any questions concerning these findings please feel free to contact me at 619-255-0321 or kmccomas@sdnhm.org.

Sincerely,



Katie McComas, M.S.
Paleontological Report Writer & GIS Specialist
San Diego Natural History Museum

Enc: Figure 1: Project map

Literature Cited

- Deméré, T.A., and Walsh, S.L. 1993. Paleontological Resources, County of San Diego. Prepared for the San Diego Planning Commission: 1–68.
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Sources: Bing Maps Hybrid imagery, Microsoft et al., 2018; Terrain hillshade, ESRI et al., 2018



Project boundary

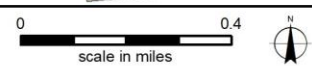
1 mile radius buffer

SDSNH localities



FIGURE 1

Project Map
Moss & Industrial Site
City of Chula Vista, San Diego County, California



Appendix D: Site Photographs

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Photograph 1: Railroad at Moss Street View N



Photograph 2: 680 Moss Street View NE Hawthorn Equipment Rental



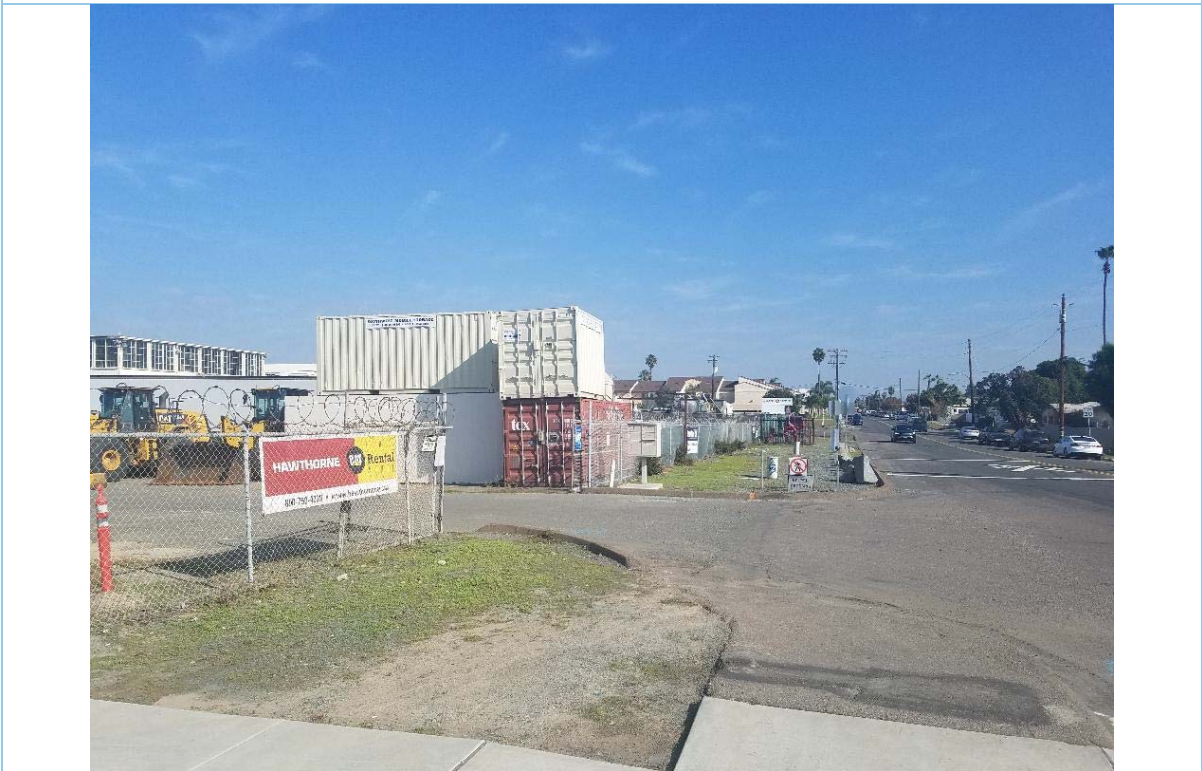
Photograph 3: 676A Moss Street View NW Rapid Prep and Boat Storage Building



Photograph 4: Moss Street View W



Photograph 5: 676 B Moss Street View N Kleen Blast Building



Photograph 6: Moss Street View E



Photograph 7: 676 B Moss Street View N Kleen Blast Building

Appendix E: Regulatory Framework

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REGULATORY FRAMEWORK

State-Level Evaluation Processes

An archaeological site may be considered a “historical resource” if it is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California per Public Resources Code (PRC) Section 5020.1(j) or if it meets the criteria for listing on the CRHR per the California Code of Regulations (CCR) at Title 14 CCR Section 4850.

The most recent amendments to the CEQA Guidelines direct lead agencies to first evaluate an archaeological site to determine if it meets the criteria for listing in the CRHR. If an archaeological site is a historical resource in that it is listed or eligible for listing in the CRHR, potential adverse impacts to it must be considered as stated in PRC Sections 21084.1 and 21083.2(l). If an archaeological site is considered not to be a historical resource but meets the definition of a “unique archeological resource” as defined in PRC Section 21083.2, then it would be treated in accordance with the provisions of that section.

With reference to PRC Section 21083.2, each site found within a project area will be evaluated to determine if it is a unique archaeological resource. A unique archaeological resource is described as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

As used in this report, a “non-unique archaeological resource” means an archaeological artifact, object, or site that does not meet the criteria for eligibility for listing on the CRHR, as noted in subdivision (g) of PRC Section 21083.2. A non-unique archaeological resource requires no further consideration, other than the simple recording of its components and features. Isolated artifacts are typically considered non-unique archaeological resources. Historic structures that have had their superstructures demolished or removed can be considered historic archaeological sites and are evaluated following the processes used for prehistoric sites. Finally, the California State Office of Historic Preservation recognizes an age threshold of 45 years. Cultural resources built less than 45 years ago may qualify for consideration but only under the most extraordinary circumstances.

Title 14 of the, Chapter 3, Section 15064.5 is associated with determining the significance of impacts to archaeological and historical resources. Here, the term historical resource includes the following:

1. A resource listed in, or determined eligible by the State Historical Resources Commission, for listing in the CRHR (PRC § 5024.1; Title 14 CCR § 4850, *et seq.*).
2. A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the PRC Section 5024.1(g) requirements, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be historically significant if the resource meets the criteria for listing on the CRHR (PRC § 5024.1; Title 14 CCR § 4852) including the following:
 - A. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
 - B. Is associated with the lives of persons important in our past.
 - C. 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.
 - D. Has yielded, or may be likely to yield, information important in prehistory or history.

Typically, archaeological sites exhibiting significant features qualify for the CRHR under Criterion D because such features have information important to the prehistory of California. A lead agency may determine that a resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1 even if it is:

- Not listed in or determined to be eligible for listing in the CRHR.
- Not included in a local register of historical resources pursuant to PRC Section 5020.1(k).
- Identified in a historical resources survey per PRC Section 5024.1(g).

Threshold of Significance

If a project will have a significant impact to archaeological and historical resources, steps must be taken to determine if the cultural resource is a "historical resource" or "unique archaeological resource" under Section 15064.5 of CEQA and a determination of the significance of impacts under Appendix G of CEQA. If analysis and/or testing determine that the resource is a unique archaeological resource and therefore subject to mitigation prior to development, a threshold of significance should be developed. The threshold of significance is a point where the qualities of significance are defined and the resource is determined to be unique under CEQA. A significant impact is regarded as the physical demolition, destruction, relocation, or alteration of the resource

or its immediate surroundings such that the significance of the resource will be reduced to a point that it no longer meets the significance criteria. Should analysis indicate that project development will destroy the unique elements of a resource, the resource must be mitigated for under CEQA regulations. The preferred form of mitigation is to preserve the resource in place, in an undisturbed state. However, as that is not always possible or feasible, appropriate mitigation measures may include, but are not limited to:

1. Planning construction to avoid the resource.
2. Deeding conservation easements.
3. Capping the site prior to construction.

If a resource is determined to be a “non-unique archaeological resource,” no further consideration of the resource by the lead agency is necessary.

Tribal Consultation

The following serves as an overview of the procedures and timeframes for the Tribal Consultation process; for the complete Tribal Consultation Guidelines, please refer to the State of California Office of Planning and Research website.

Senate Bill 18

The principal objective of Senate Bill (SB) 18 is to preserve and protect cultural places of California Native Americans. SB 18 is unique in that it requires local governments to involve California Native Americans in early stages of land use planning, extends to both public and private lands, and includes both federally recognized and non-federally recognized tribes.

Prior to the amendment or adoption of general or specific plans, local governments must notify the appropriate tribes of the opportunity to conduct consultation for the purpose of preserving or mitigating impacts to cultural places located on land within the local government’s jurisdiction that is affected by the plan adoption or amendment. The tribal contacts for this list are maintained by the NAHC and are distinct from the Most Likely Descendent (MLD) list. It is suggested that local governments send written notice by certified mail with return receipt requested. The tribes have 90 days from the date they receive notification to request consultation. In addition, prior to adoption or amendment of a general or specific plan, local government must refer the proposed action to tribes on the NAHC list that have traditional lands located within the city or county’s jurisdiction. Notice must be sent regardless of prior consultation. The referral must allow a 45-day comment period.

In brief, notices from the local government to the tribes should include:

- A clear statement of purpose.
- A description of the proposed general or specific plan, the reason for the proposal, and the specific geographic areas affected.
- Detailed maps to accompany the description.

- Deadline date for the tribes to respond.
- Government representative(s) contact information.
- Contact information for project proponent/applicant, if applicable.

The basic schedule for this process is:

- 30 days: time the NAHC has to provide tribal contact information to the local government; this is recommended, not mandatory.
- 90 days: time the tribe has to respond indicating whether or not they want to consult. Note: tribes can agree to a shorter timeframe. In addition, consultation does not begin until/unless requested by the tribe within 90 days of receiving notice of the opportunity to consult. The consultation period, if requested, is open-ended. The tribes and local governments can discuss issues for as long as necessary or productive, and need not result in agreement.
- 45 days: time the local government has to refer proposed action, such as adoption or amendment to a general or specific plan, to agencies, including the tribes. Referral is required even if there has been prior consultation. This opens the 45-day comment period.
- 10 days: time the local government has to provide the tribes with notice of a public hearing.

Assembly Bill 52

Assembly Bill (AB) 52 adds “tribal cultural resources” (TCRs) to the specific cultural resources protected under CEQA and requires lead agencies to notify relevant tribes about development projects. It also mandates lead agencies to consult with tribes if requested and sets the principles for conducting and concluding the required consultation process.

AB 52 applies to all projects on or after July 1, 2015, for which a lead agency has issued a notice of preparation (NOP) of an environmental impact report or notice of intent (NOI) to adopt a negative declaration or mitigated negative declaration. Many lead agencies are already receiving notices from the NAHC demanding compliance with AB 52. If not already familiar with AB 52 and its requirements, now is the time to become acquainted with this new law.

Under AB 52, lead agencies must now evaluate—just as they do for other historical and archeological resources under CEQA—a project’s potential impact to a TCR. A TCR is defined as a “site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe, which may include non-unique archeological resources previously subject to limited review” under CEQA. “California Native American tribes” are tribes (federally recognized or not) on the “contact list” maintained by the NAHC. If substantial evidence demonstrates that a project may cause a substantial adverse change to a TCR, AB 52 provides that the project may have a significant effect on the environment. AB 52 also contains a list of potential mitigation measures, including a preference for preservation in place, which must be considered by a lead agency, unless it determines that the measure is infeasible.

It is critical to understand that a TCR may not be located near a tribe's traditional geographical "home." Therefore, lead agencies should avoid making assumptions about which tribes could be affected by a project. The NAHC can provide information on which tribes might be traditionally and culturally affiliated with a geographic area.

Where a tribe requests in writing that a public agency inform it of proposed projects, the lead agency must notify the tribe within 14 days of determining that a project application is complete or deciding to undertake a project (i.e., no later than 14 days after releasing the NOP or NOI). Note that there is no consultation requirement for filing a Notice of Exemption.

If within 30 days of notification, the tribe responds in writing requesting consultation, then the lead agency must begin the consultation process with the tribe within 30 days of receiving that written request. It is important to note that notices from the NAHC do not constitute the requisite written tribal request that initiates the AB 52 consultation process.

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C-2: Historic Resource Evaluation Report

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**676-680 Moss Street
Chula Vista, California**



Historic Resource Evaluation Report

Prepared by:

CONSULTING



January 2020



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EXECUTIVE SUMMARY

The purpose of this report is to determine if a proposed Project (Project) in the City of Chula Vista would impact any historical resources pursuant to the California Environmental Quality Act (CEQA). The Project involves the demolition of three existing buildings on a 6.9-acre site (Project site). The Project site would be redeveloped as a residential neighborhood with a variety of housing types and open space. Two of the buildings (Buildings A and B on Figure 2, below) were constructed in 1969, are more than 45 years of age, and required evaluation as potential historical resources.

The buildings on the Project site are not currently listed under any national, state, or local landmark or historic district programs, and were not identified during the most recent historic resources survey of the City in 2012. GPA Consulting (GPA) was retained to complete this intensive-level evaluation as part of the environmental review of the Project in compliance with CEQA. After careful inspection, investigation, and evaluation, GPA has concluded that the buildings are ineligible for listing in the National Register of Historic Places, California Register of Historical Resources, or the Chula Vista Register of Historical Resources due to a lack of significance. The recommended California Historical Resource Status Code for the buildings is 6Z, "ineligible for designation at the national, state, and local levels through survey evaluation."¹

As the existing buildings on the Project site that would be removed do not meet the definition of historical resources according to CEQA, the Project would have no direct impacts on historical resources. No mitigation is required or recommended.

¹ "Technical Assistance Bulletin #8: User's Guide to the California Historical Resource Status Codes & Historic Resources Inventory Directory," California State Office of Historic Preservation, Department of Parks & Recreation, accessed March 2019, <http://ohp.parks.ca.gov/pages/1069/files/tab8.pdf>.

1. INTRODUCTION

1.1 Purpose and Scope

The purpose of this report is to determine if a proposed Project in the City of Chula Vista would impact any historical resources pursuant to the California Environmental Quality Act (CEQA). The proposed Project involves the demolition of three existing buildings on a 6.9-acre site (Project site). Two of the buildings (Buildings A and B on Figure 2, below) were constructed in 1969, are more than 45 years of age, and therefore require evaluation as potential historical resources. The Project site would be redeveloped as a residential neighborhood with a variety of housing types and open space.



Figure 1: The Project site is located in Chula Vista, east of Interstate-5 (base map: ESRI)



Figure 2: The Project site has three buildings, A, B, and C. This report addresses Buildings A and B. (base map: ESRI)



1.2 Methodology

To identify potential historical resources and assess potential project impacts, GPA performed the following tasks:

1. Conducted a field inspection of the Project site to assess the general condition and physical integrity of the buildings thereon. Digital photographs of the building exteriors were taken. General contextual photographs of the Project site were also taken.
2. Reviewed the City of Chula Vista Historic Resources Survey prepared by ASM Affiliates in 2012 to determine if the buildings had been identified as individual historical resources or contributors to an eligible historic district. The buildings were not identified in the 2012 survey either individually or as part of a potential historic district.
3. Determined that the buildings should be evaluated as individual potential historical resource and do not appear to be part of a historic district. Development types and architectural character on the Project site and surrounding area lack cohesion and neither the Project site nor the buildings thereon appear to be within an area that should be evaluated as a potential historic district.
4. Conducted research into the history of the Project site and buildings thereon. Minimal building records exist for the Project site. The Project site was incorporated into the City of Chula Vista as part of the Montgomery annexation in 1986. Original permits for the Project site buildings could not be located. The San Diego County Assessor provided a date of construction by phone, but did not provide supporting documentation. Alterations were minimally documented in the building permit record. Additional sources consulted to establish the history of the Project site included: Chula Vista Public Library Local History Collection, newspaper articles, historic maps, and bulletins of the South Bay Historical Society.
5. Reviewed the history of the Rohr Aircraft Corporation to determine if the Project site may have been part of the company's Chula Vista campus, as rumored. The Project site is physically separated from the Rohr campus by a railroad and several city blocks. Historic photographs and historic aerial photographs indicate that the Project site does not appear to have been part of the Rohr campus. Research did not reveal any evidence that the Project site buildings were associated with the Rohr Corporation; therefore, the Project site was not evaluated for an association with the company.
6. Consulted the Chula Vista Historic Resources Survey prepared by ASM Affiliates to identify the appropriate contexts under which to evaluate the buildings.
7. Reviewed and analyzed ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation designations, and assessment processes and programs to evaluate the significance and integrity of the buildings as a potential historical resource.

1.3 Qualifications of Preparers

GPA Consulting (GPA) was retained to prepare this report. Allison M. Lyons and Amanda Duane were responsible for its preparation. Emily Rinaldi assisted with fieldwork and photography. All members of the project team meet the qualifications for historic preservation professionals outlined in Title 36 of the Code of Federal Regulations, Part 61. Their résumés are attached in Appendix A.

2. REGULATORY FRAMEWORK

Generally, a lead agency must consider a property a historical resource under CEQA if it is eligible for listing in the California Register of Historical Resources (California Register). The California Register is modeled after the National Register of Historic Places (National Register). Furthermore, a property is presumed to be historically significant if it is listed in a local register of historical resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant.² The National Register, California Register, and local designation programs are discussed below.

2.1 National Register of Historic Places

The National Register is "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."³

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:⁴

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

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific property or site is understood and its meaning is

² Public Resources Code §5024.1 and 14 California Code of Regulations §4850 & §15064.5(a)(2).

³ Title 36 Code of Federal Regulations Part 60.2.

⁴ Title 36 Code of Federal Regulations Part 60.4.



made clear.”⁵ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in *National Register Bulletin #15* as “the ability of a property to convey its significance.”⁶ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

2.2 California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.⁷

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.⁸

Criteria and Integrity

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or

⁵ National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation (Washington D.C.: National Park Service, Department of the Interior, 1997), 7-8.

⁶ National Register Bulletin #15, 44-45.

⁷ Public Resources Code §5024.1 (a).

⁸ Public Resources Code §5024.1 (d).



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

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.⁹

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:¹⁰

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [SOHP] procedures and requirements;
3. The resource is evaluated and determined by the office [SOHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

SOHP Survey Methodology

The evaluation instructions and classification system prescribed by the SOHP in its *Instructions for Recording Historical Resources* provide a Status Code for use in classifying potential historical resources. In 2003, the Status Codes were revised to address the California Register. These Status Codes are used statewide in the preparation of historical resource surveys and evaluation reports. The first code is a number that indicates the general category of evaluation. The second code is a letter that indicates whether the property is separately eligible (S), eligible as part of a district (D), or both (B). There is sometimes a third code that describes some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.

⁹ Public Resources Code §4852.

¹⁰ Public Resources Code §5024.1.

4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

The specific Status Code referred to in this report are as follows:

- 6Z** Found ineligible for National Register, California Register or local designation through survey evaluation.

2.2 City of Chula Vista Historic Preservation Ordinance

The City of Chula Vista Historic Preservation Ordinance (Title 21, Chula Vista Municipal Code §21.04.100) establishes the following criteria for historical significance that a property should meet to be eligible for listing in the Chula Vista Register of Historical Resources:

- A. A Resource is at least 45 years old; and
- B. A Resource possesses historical integrity defined under Chula Vista Municipal Code §21.04.100 and the Resource is determined to have historical significance by meeting at least one of the following criteria:
 1. It is associated with an event that is important to prehistory or history on a national, state, regional, or local level.
 2. It is associated with a person or persons that have made significant contributions to prehistory or history on a national, state or local level.
 3. It embodies those distinctive characteristics of a style, type, period, or method of construction, or represents the work of a master or important creative individual, and/or possesses high artistic values.
 4. It is an outstanding example of a publicly owned Historic Landscape, that represents the work of a master landscape architect, horticulturalist, or landscape designer, or a publicly owned Historical Landscape that has potential to provide important information to the further study of landscape architecture or history.
 5. It has yielded, or may be likely to yield information important in prehistory or the history of Chula Vista, the state, region or nation.

The aspects of integrity in the City of Chula Vista mirror the seven aspects of integrity defined in National Register Bulletin #15. Integrity is further clarified in Chula Vista Municipal Code Title 21, Section 21.03.084, as:

The authenticity of a Resource's historic identity [is] evidenced by the survival of physical characteristics that existed during the Resource's historic or prehistoric period. Within the concept of Integrity there are seven recognized aspects or qualities that in various combinations, define Integrity. The seven aspects of Integrity are Location, Design, Setting, Materials, Workmanship, Feeling, and Association.

3. ENVIRONMENTAL SETTING

3.1 Brief History of the Area¹¹

The modern development of Chula Vista began in the 1880s when directors of the Santa Fe Railroad and Colonel W G Dickerson, a professional town planner, formed the San Diego Land and Town Company and subdivided areas serviced by the railroads into agricultural plots. In 1888, the Sweetwater Dam was completed, bringing water Chula Vista's residents and farms and ensuring the area's growth.

The City of Chula Vista incorporated in 1911. From the 1910s through the Great Depression, Chula Vista was primarily agricultural. The main crop was lemons, though celery was also widespread. Chula Vista's industrial development began during World War I when the Hercules Powder Company built a 30-acre kelp processing plant. Kelp was a source of materials used in the production of explosives for the war. A commercial and civic center for Chula Vista developed around Third Avenue during the 1920s and 1930s. The southern part of the City remained undeveloped through the 1930s.¹²

Like much of San Diego County, Chula Vista transformed during World War II. The Rohr Aircraft Corporation opened in Chula Vista in 1941. Rohr employed 9,000 workers in the area at the height of its wartime production and eventually encompassed 67 buildings on 162 acres along Chula Vista's bayfront from G Street to J Street, north of the Project site.



Figure 3: Rohr Aircraft Corporation campus, located northwest of the Project site (photo from circa 1946, South Bay Historical Society)

¹¹ Primarily excerpted from: "History," City of Chula Vista, January 13, 2020, <https://www.chulavista.gov/residents/about-chula-vista/history>; ASM Affiliates, "Historic Context Statement, Final Phase Two Report, Chula Vista Historic Resources Survey," Historic Resources Survey, Chula Vista, California (City of Chula Vista, November 2012), 31.

¹² ASM, Historic Resources Survey, Chula Vista, 31.

A huge population boom after World War II lead to the construction of schools, homes, banks, restaurants, gas stations and shopping centers. The population of Chula Vista tripled from 5,000 residents in 1940 to more than 16,000 in 1950.¹³ The last of the citrus groves and produce fields were subdivided into housing tracts as Chula Vista became one of the largest communities in San Diego. Areas to the east and southeast of the City as well as two miles of tidelands along the southern San Diego Bay were annexed into the City during the 1950s.¹⁴

From the 1950s through 1970s, many new businesses and industries developed along the bayfront. Broadway was a busy commuter road for Rohr workers and also connected Chula Vista to Tijuana. Commercial development along Broadway included cafes and drive-thrus, markets, a drive-in, a hardware store, and other businesses. Commerce along Broadway declined after the construction of the Montgomery Freeway (I-5) was completed in 1979.¹⁵

The Project site is in a mixed commercial, industrial, and residential area located east of the Interstate-5. The immediate surroundings of the Project site were agricultural or undeveloped until the late 1960s. The Project site was incorporated into the City of Chula Vista as part of the Montgomery annexation in 1986.

¹³ ASM, Historic Resources Survey, Chula Vista, 50.

¹⁴ ASM, Historic Resources Survey, Chula Vista, 46.

¹⁵ ASM, Historic Resources Survey, Chula Vista, 46.

3.2 History and Description of the Project site

The Project site is located at 676, 676B and 680 Moss Street and identified with parcel numbers 618-010-26-01, 618-010-31-00 and 618-010-32-00.

The Project site is bounded to the north by a storage facility, to the east and south by single and multi-family residential development, and irregularly along the west by a railroad right-of-way, Industrial Boulevard, and a parking lot. The Project site is divided between five tenants. There are three buildings on the Project site, labeled A, B, and C on Figure 4 below. Surrounding the buildings are paved parking lots used for vehicle circulation and storage for multiple types of heavy equipment, boats, and shipping containers.



Figure 4: Project site with buildings labeled (base map: ESRI)

Building A

Building A is a large volume, single-story rectangular building with a shallow front gable roof featuring a shallow overhang. The building is clad with corrugated metal siding. A concrete base on the north and south elevations returns along the east elevation. The primary entrance is three nestled, rolling garage doors on the east elevation.

Below the roofline along the north, south, and west elevations are continuous bands of paired steel casement windows with divided lights of 3-over-4. The north and south elevations are six bays across. The west elevation is 12 bays across. There is no fenestration on the east elevation.



Figure 5: Building A, primary elevation, view facing northwest (GPA, 2020)



Figure 6: Building A, east and north elevations, view facing southwest (GPA, 2020)



Figure 7: Building A, north and west elevations, view facing southeast (GPA, 2020)



Figure 8: Building A, west elevation, mostly obscured by modular storage units, view facing east (GPA, 2020)

Building B

Building B is a large volume, single-story rectangular building with a barrel roof. The building is clad with corrugated metal siding. A small rectangular addition is located at the southeast corner of the building. The addition is clad with vertical wood siding.

The primary (south) elevation is divided into three sections. At the outer east and west sections are large garage bays. The east bay does not appear to have a door. The west bay has sliding corrugate metal doors. The center section of the primary elevation features four bays of single, fixed windows with steel muntins, divided into 4-over-3 lights. Several lights are missing. At the center of the primary elevation, below the roofline, is a horizontal flat panel possibly used for signage that is no longer extant. The addition at the southeast corner of the building features a single metal door flanked by paired, divided light windows with security bars along the south elevation. The entrance is sheltered by a flat roof with signage.

Along the east elevation, the addition had three bays of paired windows with security bars and a secondary entrance. The elevation is dominated by a loading dock with a shed roof and raised concrete loading dock that extends the length of the elevation from the addition to the northeast corner.

The north elevation is divided into three sections, mirroring the south elevation. At the outer east and west sections are large garage bays. The east bay does not appear to have a door. The west bay is partially infilled with corrugated metal panels. A shed roof metal awning supported by a metal armature projects over this bay. The center section of the north elevation features four bays of single, fixed windows with steel muntins, divided into 4-over-3 lights that are painted.

The west elevation of the building is divided into nine bays. Below the roofline are widely spaced, single, fixed windows with steel muntins, divided into 6-over-3 lights. A shed roof metal awning supported by a metal armature projects over the sixth bay from the south. The only opening on this elevation is a garage bay in this sixth bay. Large concrete blocks line the base of the elevation, but do not appear to be integrated into the structure.



Figure 9: Building B, primary (south), view facing north (GPA, 2020)



Figure 10: Building B, east elevation, view facing northwest (GPA, 2020)



Figure 11: Building B, north elevation, view facing southeast (GPA, 2020)



Figure 12: Building B, west elevation, view facing southeast (GPA, 2020)

Building C

Building C was constructed circa 1975 and is not addressed in this report.

Construction and Ownership History of Project site

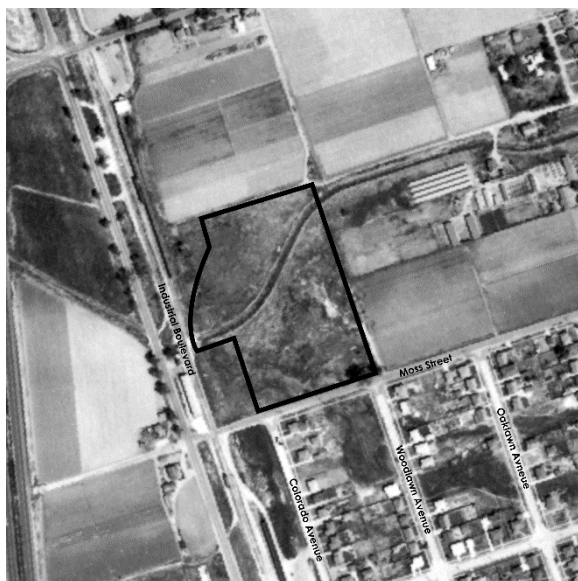


Figure 13: Project site in 1953, outlined in black (Source: UCSB)



Figure 14: Project site in 1963, outlined in black (Source: UCSB)



Figure 15: Project site in 1975, outlined in black, following construction of buildings (Source: UCSB)

Historical aerial photographs were a key source of information about the development of the Project site. Photographs from 1953 to 1966 show the Project site undeveloped (See Figure 13 and Figure 14). No planted rows are visible and the site does not appear to be divided for agricultural use. Photographs from 1971 (not pictured due to copyright protection) and 1975 (Figure 15) show development on the Project site. According to the San Diego County Assessor, development of the Project site was completed on October 3, 1969.¹⁶ Records did not specify extent of

¹⁶ Phone conversation, San Diego County Assessor, January 2, 2020.



improvements on the site, only an increase in the valuation. There are no permit records for the initial construction of the subject properties on the Project site. While historic aerial photographs show the Project site as vacant in 1966, the next available photograph is dated 1971 and shows both subject properties on the Project site.

There are no permits for the subject buildings in the San Diego County Commercial Industrial Building Records or the San Diego County Survey Records System.

The address range for the Project site does not appear in directories for San Diego County or Chula Vista during the 1960s and 1970s.¹⁷

Permit records for the buildings begin in the late 1980s, following the incorporation of the Project site into the City of Chula Vista as part of the Montgomery annexation.

The earliest listed tenant for 676 Moss Street is American Mill & Manufacturing, Inc, a wholesale lumber business. The company was founded in the 1940s and was first listed in directories with the Project site address in 1981.¹⁸ In 1987, a 4,000-gallon underground fuel storage tank was removed from the northeast corner of the Project site by American Mill & Manufacturing, Inc.¹⁸ The company appears to have gone out of business around 1993.¹⁹

Subsequent building permits were issued for minor alterations, such as electrical repairs, from 1997 to 2003. San Diego Pallets, a building pallet company, upgraded a switchboard on the Project site in 1997.²⁰ There are no company names listed on the permits.

Building A is currently occupied by Rapid Prep, a rental location for steel surface preparation equipment. Building B is currently occupied by Kleen Blast, a company that sells specialty abrasives and sand blast materials.

¹⁷ Directories from the 1960s and 1970s in the Chula Vista Public Library Local History Collection were included in this search.

¹⁸ Environmental Management Strategies, Phase I Environmental Site Assessment 676 - 680 Moss Street Chula Vista, California (July 2018).

¹⁹ Classified Ad. *Los Angeles Times*, October 24, 1993, OCB16.

²⁰ City of Chula Vista, Building Permit No. B97-1122, May 12, 1997.

4. HISTORIC CONTEXTS

The potential significance of a property must be evaluated within its historic context(s). Historic contexts are those patterns or trends in history by which a specific property is understood. City of Chula Vista Historic Resources Survey completed by ASM Affiliates, Inc. in October 2012 includes a historic context that outlines relevant themes, time periods, events, people, and architectural styles within which potential historical resources can be evaluated. The most relevant theme for the evaluation of the buildings on the Project site is City Maturation: From Agriculture to Commercial Development and Industry (1940-1970), Economic Development 1950-1970, excerpted below:

Economic Development, 1950s-1970s²¹

During the 1950s, the population continued to grow as agriculture gave way to housing developments, schools, and shopping centers. More extensive areas to the east and southeast were annexed, along with tidelands and more than two square miles of the southern portion of San Diego Bay.²² The 9-acre Civic Center project constructed on an old lemon orchard characterized the beginning of the end of agriculture and the development of a dense urban core. A new library, post office, and City Hall were all constructed as part of the complex. Memorial Bowl was also connected to a new gymnasium and public pool. Chula Vista High was completed in 1950, which meant students no longer had to be bused to Sweetwater High School or attend temporary classrooms at Brown Field. The Chula Vista Community Hospital was also expanded in 1955.²³ In the midst of Cold War apprehensions, new city patrols were enforced, fallout shelters were constructed at the Civic Center and private residences, and the World War II watchtower at the Mutual lemon packing plant was reused. New subdivisions developed from old Otay Ranch land, and several churches were constructed to serve those new communities.²⁴ A new trend developed of constructing retail stores outside the city center as more houses filled in the outskirts of the City.²⁵

Many of the new industries developed at the bay front. Broadway remained a busy road for those headed to Tijuana and for Rohr workers. A number of eating franchises catered to travelers and workers, with cafes and drive-thrus, markets, a drive-in, a hardware store, and other businesses that subsequently faded with the newly constructed Montgomery Freeway (I- 5). Some flourished, with easy off-ramps to facilities such as the Big Ski Drive-In (1955) and the South Bay Drive-In (1958). Rohr continued to operate at the bay front under the appliance company Detrola for a time, but during the Korean Conflict it was returned to Fred Rohr's direction. Under Rohr, the company returned to the production of engine pods for various aircraft, though it was with a smaller, yet important workforce of 6,700. Rohr continued to operate in the 1960s as a company of over 11,000 employees and still constructed engine pods for propeller and jet planes of all the major aeronautical companies, but it also added manufacturing of dish antennas, rocket nozzles for ThoiKol, cylinders for solid-fuel boosters of the Titan II-C, and parts for prefabricated homes.²⁶

²¹ ASM, *Historic Resources Survey, Chula Vista*, 46-47. For ease-of-reading and internal document consistency, parenthetical citations have been changed to footnotes.

²² "Chula Vista General Plan," City of Chula Vista, Accessed 2008, www.chulavista.gov.

²³ City of Chula Vista General Plan; Steven Schoenherr, *Chula Vista Centennial: 1911-2011* (City of Chula Vista, 2011) 89-91, 101-02.

²⁴ Schoenherr, 92-93, 95-99.

²⁵ Iris Engstrand, *San Diego: California's Cornerstone* (San Diego: Sunbelt Publications, 2005).

²⁶ Schoenherr, 102, 106-107, 95-97, 132.

cylinders for solid-fuel boosters of the Titan II-C, and parts for prefabricated homes.²⁷ Industry, services, and suburban development characterized the main sectors of economic growth in the succeeding decades.

For control of the bay front and outlying areas, the cities of San Diego and Chula Vista battled one another during the 1950s and 1960s. While San Diego acquired land south of Otay River and east to Otay Mountain, Chula Vista gained land along I-5 and south to Palomar Street in 1959. The undeveloped tidelands of the bay front remained problematic in an environment where each bayside city had its own agenda for the harbor. Chula Vista Mayor Bob McAllister organized a San Diego Bay Committee comprised of all five of the bay cities, which eventually supported the creation of a Unified Port Authority that assumed control of the tidelands in January 1963. Chula Vista continued filling in the tidelands attracting industry to the bay front, and constructed a boat harbor. Infrastructure improvements in the 1960s included San Diego Gas and Electric's power plant, planning for the construction of I-805, joining the South Bay Irrigation District for more Colorado River water, the enlargement of the sewer system to lure outlying areas into accepting annexation for new subdivisions, and construction of Southwestern College.²⁸

Chula Vista had become the second largest city in the county by 1960.²⁹ The county population had risen to over a million, and between 1950 and 1970, bedroom communities such as El Cajon, Escondido, Chula Vista, and Oceanside experienced a tremendous growth rate of between 214 and 833 percent.³⁰ Chula Vista continued to grow eastward over the next several decades including land that was annexed east of I-805 in the 1980s, specifically the Montgomery area in the southeast, adding 23,000 to the City's population and the largest inhabited annexation approved in California. It was the most populous annexation approved in California. During the latter half of the 1980s and the 1990s, Rancho del Rey, Eastlake, and other master-planned communities in eastern Chula Vista began to develop, and more than 14 square miles of Otay Ranch were annexed and planned for future development.³¹ By 2000, Chula Vista boasted 173,556 residents and has remained the second-largest city in San Diego County.

Property types from the City Maturation period include residential, commercial, civic, and community buildings. Properties from this period will be eligible for local designation for their association with significant events and people (City of Chula Vista Local Register Criteria 1 and 2) if they retain to a significant degree their building materials dating to the period of significance (1940-1970). Those events and people must be a good representation of the City Maturation period, and may further represent one of the areas of significance established by the NRHP that are applicable to most California communities. Additionally, eligible properties will retain a high degree of integrity of location, setting, feeling, and association. Properties should also retain good integrity of design, materials, and craftsmanship, but some loss of these aspects of integrity is acceptable. If multiple properties are extant that represent the same historical themes or associations, a comparison of similar resources is critical to determining which are eligible for local designation.

²⁷ Ibid.

²⁸ Schoenherr, 108, 114-122.

²⁹ 1960 U.S. Census.

³⁰ Engstrand, 166; 1960 U.S. Census.

³¹ City of Chula Vista General Plan 2005.

5. EVALUATION

Though physically separate and currently occupied by different tenants, the subject buildings appear to have been occupied by one company when initially constructed. Research did not reveal any difference in the buildings' history; therefore, the significance of the buildings is evaluated together.

5.1 National Register of Historic Places

Criterion A

To be eligible for listing in the National Register under Criterion A, a property must have a direct association with events that have made a significant contribution to the broad patterns of our history. For the Project site, the most relevant context would be Economic Development in Chula Vista.

The context for Economic Development in Chula Vista explains that property types reflecting the historical significance of the City Maturation period may include residential, commercial, civic, and community buildings associated with significant events and people who are a good representation of the City Maturation period.

The significant events in the City's economic development during the late 1960s through the 1970s were primarily focused on drawing industry to the bay front. Tideland infill increased the City's available land for industry during this period; nine acres of bay front tidelands were infilled to be leased to Rohr, the airplane parts manufacturer. The City planned to fill another 75 acres over the course of the 1960s. Significant events of the period include the construction of the boat harbor and major infrastructure improvements such as San Diego Gas and Electric's power plant, construction of I-805, joining the South Bay Irrigation District for more Colorado River water, and the enlargement of the sewer system.

The subject buildings were constructed in 1969, at the end of a period of postwar economic growth in Chula Vista at a site inland from the bayfront areas that were the focus of development. Research indicates that the buildings were the location of American Mill & Manufacturing, Inc. from approximately 1970 to 1993. The company specialized in wholesale millwork. It was founded in 1945 and located in San Diego at 600 E. Harbor.³² It is unclear when the company relocated to Chula Vista, but records indicate that the firm may have been responsible for a gas tank installed at the Project site in 1970.³³ The company was relatively small, with 25-49 employees in 1981. Long-time company president William F. Evenson and vice president Oberlin J. Evenson were both military veterans and worked at the company for more than 40 years.³⁴ The company appears to have been in business in Chula Vista until 1993, when a public auction of its assets was advertised as a going-out-of-business sale.³⁵

American Mill & Manufacturing does not appear to be significant for its association with the history of Chula Vista within the context of Economic Development of the City during the City Maturation

³² "1947-48 City Directory Book Part 4," City of San Diego Digital Archives, accessed January 14, 2020, https://www.sandiego.gov/sites/default/files/1947-48_part_4.pdf. (page 1861).

³³ Environmental Management Strategies, Phase I Environmental Site Assessment.

³⁴ San Diego Chamber of Commerce. Business Directory (Windsor Publications, Directory Division: 1981), 21. Accessed January 14, 2020, books.google.com. "Improvements at San Diego," The Timberman Vol 52 (1950): 115. Accessed January 14, 2020, books.google.com

³⁵ Classified Ad. *Los Angeles Times*, October 24, 1993, OCB16.

period. While a mill and source of building materials was undeniably important to the local construction industry, research did not indicate the company played a significant role in the economic development of the City. National Register Bulletin #15, the guidance under Criterion A states that "Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well."³⁶ The company was associated with the trend of economic development, but does not appear to have a specific, significant association.

Aviation was an important industry in the history of Chula Vista. The Rohr Corporation was one of the City's largest employers and instrumental in the City's development during and after World War II. National Register Bulletin #15 states, "a property is not eligible if its associations are speculative."³⁷ While buildings appear similar to aviation-related property types of the mid-twentieth century, research did not reveal any associations with aviation or the Rohr Corporation.³⁸

For the reasons discussed above, the buildings do not appear to be significant under Criterion A.

Criterion B

To be eligible for listing in the National Register under Criterion B, a property must be associated with lives of persons significant in our past.

Two individuals were identified as having an association with the subject building: William F. Evenson and Oberlin J. Evenson.³⁹ Research indicates that the two men were first cousins.⁴⁰ In the 1980s, William F. Evenson was the president of American Mill & Manufacturing and Oberlin J. Evenson was the vice-president.⁴¹ Both men were affiliated with the company for over 40 years, and they are presumed to have been responsible for its founding.⁴² As discussed under Criterion A, American Mill & Manufacturing was a wholesale millwork company that was established in 1945 in San Diego but does not appear to be a significant company in the economic development of Chula Vista reflecting the City Maturation period. As such, the men's leadership roles at the company would not be considered significant. Both men were also active in their communities, but there is no evidence to suggest that these contributions would be considered historically significant. Regardless, if information became available to the contrary, building would not be associated with or represent any of these activities outside the workplace. While a number of other individuals have worked in the building from the time of its construction to the present day,

³⁶ National Register Bulletin #15, 12.

³⁷ Photographs of the Rohr campus were reviewed to determine if the buildings on the Project site might have been originally located on the Rohr campus and moved to the Project site. This research was inconclusive.

³⁸ Ibid.

³⁹ San Diego Chamber of Commerce, Business Directory (Windsor Publications, Directory Division: 1981), 21, accessed January 14, 2020, books.google.com.

⁴⁰ Ancestry.com

⁴¹ San Diego Chamber of Commerce, 21.

⁴² William Frederick Evenson," San Diego Tribune, August 7, 2011, accessed January 14, 2020, <https://www.legacy.com/obituaries/sandiegouniontribune/obituary.aspx?n=william-frederick-evenson&pid=152900622>; "Oberlin J. Evenson," San Diego Tribune, September 10, 2010, accessed January 14, 2020, <https://www.legacy.com/obituaries/sandiegouniontribune/obituary.aspx?n=oberlin-j-evenson&pid=145698862>.



collaborative efforts are best evaluated under Criterion A. For these reasons, the buildings do not appear to be significant under Criterion B.

Criterion C

To be eligible for listing under Criterion C, a property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction.

The subject buildings are industrial in nature and appear to have been constructed from pre-fabricated or salvaged materials. Both are utilitarian buildings and neither possess the characteristics of a formal architectural style. Industrial or warehouse buildings could be built in a very similar way with similar materials if they were to be constructed today, and subject buildings do not possess any identifiable characteristics that would indicate a specific era of construction. Therefore, the buildings do not represent an important phase or method of industrial construction. As warehouses, they inherently lack high artistic value, and are unlikely to be the work of a master. Lastly, neither contribute to a potential historic district. While the Project site is adjacent to a small grouping of other industrial properties, there is no visual cohesion or shared development history due to varying construction dates, more recent development, and nearby residential development. Therefore, the buildings do not appear to be significant under Criterion C.

Criterion D

To be eligible for listing under Criterion D, a property's physical material must have yielded, or may be likely to yield, information important to history or prehistory.

This criterion generally applies to archaeological resources but may apply to a built resource in instances where a resource may contain important information about such topics as construction techniques or human activity. In any case, the resource must be the principal source of information. This is unlikely to be true for the subject buildings. Therefore, the buildings do not appear to be significant under Criterion D.

Integrity

To be eligible for listing in the National Register, properties must retain their physical integrity from the period in which they gained significance. In the case of architecturally significant properties, the period of significance is normally the date of construction. For historically significant properties, the length of the historic associations usually measures the period of significance. As the subject buildings are not significant under any National Register criterion, they do not have a period of significance and the integrity of the buildings does not require examination.

5.2 California Register of Historical Resources

The California Register criteria for eligibility mirror those of the National Register. Therefore, the buildings on the Project site do not appear eligible for listing on the California Register for the same reasons outlined above.

5.3 Local Landmark or Historic District

To be eligible as a historical resource in the City of Chula Vista, a property must meet Criterion A and one aspect of Criterion B.



Under Criterion A, a building must have been constructed more than 45 years ago to be eligible for listing on the local register as a historical resource. The subject buildings were constructed in 1969. As such, they are buildings more than 45 years of age and meet the eligibility standard for City of Chula Vista Criterion A.

Criteria B.1, B.2, and B.3 of the Chula Vista Historic Preservation Ordinance mirror National Register Criteria A, B, and C and California Register Criteria 1, 2, and 3. Chula Vista Criteria B.5 mirrors National Register Criteria D and California Register Criteria 4.

Neither Building A nor Building B appears to be eligible for listing as a local landmark in the City of Chula Vista under local Criteria B.1, B.2, B.3, or B.5 as analyzed above under the National Register evaluation for Criteria A, B, C, and D.

To be eligible for listing under Criterion B.4, a property must be an outstanding example of a publicly owned Historic Landscape. The Project site is privately owned and is not a historic designed landscape; therefore, none of the buildings on the Project site are eligible under local Criterion B.4.

6. CONCLUSIONS

The buildings located at 676-680 Moss Street are not currently designated or listed under any national, state, or local landmark programs. The buildings have not been identified as eligible for local designation by a recent historic resources survey. GPA evaluated two buildings on the Project site constructed circa 1969 as part of the CEQA compliance process. GPA concludes that the buildings do not appear to be eligible for listing in the National or California Registers, or the Chula Vista Register of Historical Resources due to a lack of significance. Therefore, the buildings do not appear to be historical resources subject to CEQA. The recommended Status Code for the buildings is 6Z. As the proposed Project would have no impact on historical resources, no further study is required.

7. SOURCES

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APPENDIX A: RÉSUMÉS



ALLISON M. LYONS is an Associate Architectural Historian at GPA. She has been involved in the field of historic preservation since 2007. Allison graduated from Columbia University with a Master of Science in Historic Preservation. She has since worked in private historic preservation consulting in California. Allison joined GPA in 2015 and her experience has included the preparation of environmental compliance documents in accordance with the California Environmental Quality Act and Section 106 of the National Historic Preservation Act; Historic American Buildings Survey/Historic American Engineering Record recordation; large-scale historic

resources surveys; Federal Rehabilitation Tax Credit and Mills Act applications; local landmark applications; and evaluations of eligibility for a wide variety of projects and property types throughout California. She is also highly experienced in writing National Register of Historic Places nominations as well as historic context statements for local governments.

Educational Background:

- M.S., Historic Preservation, Columbia University, 2010
- Certificate, Business Fundamentals CORE Program, Harvard Business School Online, 2016
- B.A., European Studies, Scripps College, 2006

Professional Experience:

- GPA Consulting, Associate Architectural Historian, 2015-Present
- Chattel Inc., Associate Architectural Historian, 2013-2015
- Architectural Resources Group, Architectural Historian, 2010-2013
- Mellon Graduate Fellowship in Primary Sources, Columbia University, 2009-2010

Qualifications:

- Meets the Secretary of the Interior's Professional Qualifications Standards for history and architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.
- Advisory Council on Historic Preservation, Section 106 Essentials

Professional Activities:

- Graduate School of Architecture, Planning, and Preservation at Columbia University, Alumni Board Member, 2013-Present
- Urban Land Institute, Young Leader's Group, 2014-2018

Selected Projects:

- 8377-8389 Blackburn Avenue, Los Angeles, CEQA Historical Resource Technical Report, 2019
- Morrison Hotel, Los Angeles, CEQA Historical Resource Technical Report, 2018
- Angel's Landing, Los Angeles, CEQA Historical Resource Technical Report, 2018
- 3003 Runyon Canyon, Los Angeles, CEQA Historical Resource Technical Report, 2018
- Highland Park Jr. Art Center, Los Angeles, CEQA Historical Resource Evaluation Report, 2018
- Sunset & Western, Los Angeles, CEQA Historical Resource Technical Report, 2017
- Hollywood Roosevelt, Los Angeles, Preservation Plan, 2017
- Farmers & Merchants Bank Building, Los Angeles, Preservation Plan, 2017
- Postwar Development and Architecture in Fremont Historic Context Statement, 2017
- Los Angeles Wholesale Flower Terminal, Los Angeles, Historical Resource Evaluation Report, 2017
- City of Hope Master Plan, Duarte, CEQA Historical Resource Technical Report, 2017
- Vermont Corridor Development, Historical Resources Evaluation Report, 2017
- Art Center College of Design Master Plan, Pasadena, CEQA Historical Resource Technical Report, 2016
- 2222 S. Figueroa Street, Los Angeles, CEQA Historical Resource Technical Report, 2016
- 1440-52 Gordon Street, Los Angeles, CEQA Historical Resource Evaluation Report, 2016



AMANDA DUANE is an Associate Architectural Historian at GPA. She has been involved in the field of historic preservation since 2011. Amanda graduated from Savannah College of Art and Design with a Bachelor of Fine Arts in Historic Preservation. She has since worked in private historic preservation consulting in California. Amanda joined GPA in 2012 and her experience has included the preparation of environmental compliance documents in accordance with the California Environmental Quality Act and Section 106 of the National Historic Preservation Act; Historic American Buildings Survey/Historic American Engineering Record

recordation; large-scale historic resources surveys; Federal Rehabilitation Tax Credit and Mills Act applications; National Register of Historic Place nominations; local landmark applications; historic context statements; and evaluations of eligibility for a wide variety of projects and property types throughout California. She is experienced in working with local governments to develop design guidelines for administering local design review.

Educational Background:

- B.F.A, Historic Preservation, Savannah College of Art and Design, 2011

Professional Experience:

- GPA Consulting, Associate Architectural Historian, 2012-Present
- Architectural Resources Group, Intern, 2012
- City of Los Angeles, Office of Historic Resources, Intern, 2011-2012

Qualifications:

- Meets the Secretary of the Interior's Professional Qualifications Standards for architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.
- National Preservation Institute, Section 106: An Introduction

Professional Activities:

- California Preservation Foundation Conference Programs Committee, 2017

Selected Projects:

- Pioneer Oil Refinery, Santa Clarita, CEQA Historic Resource Evaluation Report, 2019
- 3443 S. Sepulveda Boulevard, CEQA Historic Resource Evaluation Report, 2018
- High Speed Rail, Los Angeles to Burbank, CEQA/NEPA Historical Resource Technical Report, 2016-2018
- 847-97 W. 10th Street, Los Angeles, CEQA Historical Resource Evaluation Report, 2018
- Oakwood School Master Plan, Los Angeles, Historical Resource Technical Report, 2016
- Villa Carlotta, Los Angeles, CEQA Historical Resource Technical Report, 2016
- Mira Loma Detention Center Women's Facility, Los Angeles County, CEQA Historical Resource Technical Report, 2016
- Commonwealth Nursery, Los Angeles, CEQA Historical Resource Technical Report, 2016
- City Market of Los Angeles, CEQA Historical Resource Technical Report, 2015
- 732 S. Spring Street, Los Angeles, CEQA Historical Resource Technical Report, 2015
- 1000 S. Santa Fe Avenue, Los Angeles, CEQA Historical Resource Technical Report, 2015
- LA Biomed, Torrance, CEQA Historical Resource Technical Report, 2014
- Willys Knight Building, Los Angeles, CEQA Historical Resource Technical Report, 2013
- High Desert Corridor, Los Angeles County, Section 106 Historical Resource Evaluation Report, 2013



EMILY RINALDI is an Associate Architectural Historian at GPA. She has been involved in the field of historic preservation since 2011. Emily graduated from Columbia University with a Master of Science in Historic Preservation, receiving the school's highest honor for her thesis work. She has since worked in private architecture and historic preservation consulting in both the New York metropolitan area and California. Emily joined GPA in 2017 and her experience has included the preparation of environmental compliance documents in accordance with the California Environmental Quality Act and Section 106 of the National Historic Preservation Act; Historic

Structure Reports; local landmark nominations; Federal Rehabilitation Tax Credit and Mills Act applications; historic context statements; large-scale historic resource surveys; and evaluations of eligibility for a wide variety of projects and property types throughout Southern California. She is also experienced in providing property owners with expert guidance in the rehabilitation and restoration of historic buildings, having completed numerous projects in New York and Los Angeles.

Educational Background:

- M.S., Historic Preservation, Columbia University, 2013
- B.A., History, New York University, 2009
- B.A., Political Science, New York University, 2009

Professional Experience:

- GPA Consulting, Associate Architectural Historian, 2017-Present
- Building Conservation Associates, Inc., Historic Preservationist, 2015-2017
- Avery Drawings & Archives, Columbia University, Graduate Intern, 2012-2013
- Docomomo, US, Intern, 2012

Qualifications:

- Meets the Secretary of the Interior's Professional Qualifications Standards for history and architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.

Professional Activities:

- Vernacular Architecture Forum, Image Editor for *Buildings & Landscapes*, 2014-2019

Selected Projects:

- 617 Rossmore Avenue, Los Angeles, CEQA Historical Resource Technical Report, 2019
- Shoemaker Bridge, Long Beach, Section 106 Historical Resource Evaluation Report, 2018
- 1100 E. 5th Street, Los Angeles, CEQA Historical Resource Technical Report, 2017
- 676 Mateo Street, Los Angeles, CEQA Historical Resource Technical Report, 2017
- 314-18 Firmin Street, Los Angeles, Historical Resource Evaluation Report, 2017
- 401 S. Hewitt Street, Los Angeles CEQA Historical Resource Technical Report, 2017
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