

4.8 CULTURAL RESOURCES

The *FORA Reuse Plan Final Environmental Impact Report* (FORA FEIR) identified on a program level less than significant environmental impact for cultural resources as related to disturbance of archaeological resources, Native American traditional cultural properties, and historically significant resources.

Site specific details and project-level information for the EGSP project was not known and not analyzed at the time of the FORA FEIR. New information between the time the FORA FEIR was certified and the release of the Notice of Preparation (NOP) for the currently proposed EGSP project includes the preparation of site-specific plans, proposed building designs and elevations, and changes in land use intensity for the proposed project. Other changes include specifications for proposed building types and materials. In addition to these changes, at the time of the FORA FEIR was certified, two different uses were proposed for the East Garrison area.

This section provides additional analysis of potential impacts not previously analyzed in the FORA FEIR. This analysis is based on the *Historic Resources Assessment* (HRA) dated January 2004, prepared by the Architectural Resources Group (ARG) for the EGSP; the HRA Impact Section dated March 2004, developed by ARG; the *Guidelines for Rehabilitating Buildings at the East Garrison*, Fort Ord dated March 2004; and a literature search and preliminary archaeological field investigation conducted by Michael Brandman Associates (MBA) in September 2003. These documents are included in their entirety in this DSEIR's Appendix I.

4.8.1 Environmental Setting

REGULATIONS AND CRITERIA OF EVALUATION

The requirements of the National Environmental Protection Act (NEPA) and the California Environmental Quality Act (CEQA) provide the regulatory frameworks and criteria used here to identify the impacts of the proposed project on historic resources.

National Environmental Policy Act

NEPA requires federal agencies to consider the environmental effects of their activities, one of which is potential impacts to historic resources. Under NEPA, resources that meet the criteria for listing on the National Register of Historic Places (NRHP) are considered historic resources. Resources that meet the criteria and have been determined eligible for the NRHP are protected under Section 106 of the National Historic Preservation Act whenever an undertaking with federal involvement is proposed. The NRHP criteria are described in the following paragraphs.

National Register of Historic Places

NRHP is the nation's master inventory of known historic resources. It includes listings of resources including: buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the National, State, or local level. Resources over 50 years of age can be listed on the NRHP. However, properties under 50 years of age that are of exceptional significance or are contributors to a district can also be included on the NRHP.

There are four criteria under which a potential resource may be considered significant and eligible for listing on the NRHP. These include resources that:

- A.) Are associated with events that have made a significant contribution to the broad patterns of history; or
- B.) Are 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.) Have yielded or may likely yield information important in prehistory or history.

A resource can be individually eligible for listing on the NRHP under any of the above four criteria, or it can be listed as contributing to a group of resources that are listed on the NRHP. East Garrison is considered a Historic District (see Exhibit 4.8-1). A district is defined as a geographically definable area—urban or rural, small or large—possessing a significant concentration, linkage, or continuity of sites, buildings, structures, and/or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history. Contributing resources are resources that add to the historic association, historic architectural qualities, or archaeological values which contribute to significance of the district. Non-contributing structures and buildings do not add to the historic association, historic architectural qualities, or archaeological values of the district because the resource was not present during the period of significance, does not related to the documented significant contexts, or does not possess integrity.

A resource can be considered significant in American history, architecture, archaeology, engineering, or culture. Once a resource has been identified as significant and potentially eligible for the NRHP, its historic integrity must be evaluated. Integrity is a function of seven factors: location, design, setting, materials, workmanship, feeling, and association. A full definition of each of these factors is included in Appendix I. These factors closely relate to the resource's significance and must be intact for NRHP eligibility.

California Environmental Quality Act

The EGSP is subject to the CEQA because it is a discretionary project that may impact potential historic resources located within the project boundaries. Under CEQA, a project that results in a substantial adverse change in the significance of a historical resource is a project that may have a significant adverse effect on the environment (CEQA Statutes 21084.1). CEQA defines substantial adverse change in the significance of a resource as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource is materially altered (CEQA Guidelines 15064.5). Additionally, no project that may cause a substantial adverse change in the significance of a historical resource is exempt from CEQA (CEQA Statutes 21084e).

Under CEQA, a resource is considered historically significant if it is listed on the California Register of Historical Resources (CRHR) or has been determined to be eligible for listing by the California State Historic Resource Commission. A historical resource may also be considered significant if the lead agency determines, based on substantial evidence, that the resource meets the criteria for



Source: Archaeological Resources Group, January 2004.



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Michael Brandman Associates
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Exhibit 4.8-1 Historic District Map

inclusion on the CRHR. The criteria are listed below. CEQA also contains additional guidelines for defining a historical resource:

- California properties formally determined eligible for, or listed on the NRHP (Section 5024.1.d.1); or
- Those resources included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code, or identified as significant in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code; or
- Those resources that a lead agency determines to be historically significant (generally, if it meets criteria for listing on the CRHR), provided the determination is supported by substantial evidence; or
- Those resources a local agency believes are historical for more broadly defined reasons than identified in the preceding criteria.

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is a listing of State of California resources that are significant within the context of California's history. The CRHR criteria are modeled after NRHP criteria; however, the CRHR focuses more closely on resources that have contributed to the development of California.

All resources listed in or formally determined eligible for the NRHP are eligible for the CRHR. In addition, properties designated under municipal or county ordinances are also eligible for listing on the CRHR. The primary difference between the NRHP and the CRHR is that the latter allows for a lower level of integrity. Like the NRHP criteria, types of resources eligible for nomination for listing in the CRHR are buildings, sites, structures, objects, or historic districts. A historical resource must be significant at the local, state, or national level under one or more of the following criteria:

1. It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the United States.
2. It is associated with the lives of persons important to the nation or to California's past.
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the state or the nation.

Resource Integrity

To be eligible for either the NRHP or CRHR a resource must not only be historically or architecturally significant, it must also retain integrity, or its ability to convey its significance. Integrity is grounded in an understanding of a property's physical features and how they relate to its significance within one or more contexts. It is a function of the resource's location, design, setting, materials, workmanship, feeling, and association, and must be closely related to the reason for the resource's significance.

Resources that have lost a great deal of their integrity are generally not eligible for the NRHP. However, the CRHR regulations have specific language regarding integrity that notes:

It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register [California Code of Regulations Title 15, 11.5 (c)].

County of Monterey Historic Resources

Monterey County Ordinance No. 03795 was adopted in 1994. The Ordinance establishes a Historic Resources Review Board and defines its duties. The Ordinance also creates a Preservation of Historic Resources Code and defines the criteria and procedures for the designation of historical and culturally significant resources. Provisions are made for the review of construction or demolition permits for projects that have the potential to impact properties that have been designated historical or culturally significant resources.

HISTORICAL SETTING

The HRA prepared for the EGSP project identified eight historic contexts as relevant to the historic resources at East Garrison. Historic contexts are a necessary part of significance evaluations for resources. They allow for the interpretation of history by identifying common themes, geographical areas, and time periods, and guide decision-making for the planning, identification, evaluation, restoration, registration, and treatment of historic properties. The dominant contexts or themes for East Garrison are:

- Early Settlement
- Whitcher Family Presence
- Early Military Presence
- New Deal Programs: Civilian Conservation Corp and Works Progress Administration
- Mobilization for World War II
- East Garrison Site Development
- World War II
- Post World War II Training Center

Table 4.8-1: East Garrison Building Numbers

Common #	Common Name	Aerial 1940 (1940a and 1940b)	Aerial 1940 (1939 to 1941)	Map Nov. 1940	Map June/ July 1941	Map 15 July 1941	Map 29 Feb 1959	Map 1972
12, 17		Not Shown	Not Shown	Latrines	Shown	Shown	Special Buildings	Shown
13, 16		Not Shown	Not Shown	Mess	Shown	Shown	Mess & Food Supply	Shown
14:		Not Shown	Not Shown	Headquarters	Not Shown	Not Shown	Administration	Shown
27, 29, 30, 33-38	Mess Halls	Not Shown	Not Shown	Kitchen and Mess Hall	Shown	Not Shown	Mess & Food Supply	Shown
S-55, S-56, S-57, S-58	Premanufactured Buildings	Not Shown	Not Shown	Not Shown	Not Shown	Not Shown	Not Shown	Not Shown
74-83	Latrines	Shown	Shown	Latrines & Bath	Shown	Shown	Special Buildings	Shown
91		Not Shown	Not Shown	Not Shown	Shown (w/o addition)	Shown (w/o addition)	Special Building (w/ addition)	Shown
110-113, 115-118	Storehouse	115 and 116 Shown	115 and 116 Shown	Warehouse	Shown	Shown	Warehouse & Shop	Shown
124	Rod and Gun Club	Not Shown	Not Shown	Not Shown	Not Shown	Not Shown	Barracks	Shown
T-5 and T-20		Not Shown	Not Shown	Shown	Shown	Shown	Special Building	Shown
T-6		Not Shown	Unclear	Shown	Shown	Shown	Hospital & Medical	Shown
T-7		Not Shown	Unclear	Shown	Shown	Shown	Administration	Shown
T-8		Not Shown	Unclear	Not Shown	Not Shown	Not Shown	Administration	Shown
T-9		Not Shown	Unclear	Shown	Shown	Shown	Special Building	Shown
T-10		Not Shown	Unclear	Officers Mess	Shown	Shown	Mess & Food Supply	Shown
T-22		Not Shown	Shown	Shown	Shown	Shown	22-Family Housing	Shown
T-23		Not Shown	Shown	Shown	Shown	Shown	23-Special Buildings	Shown
T-24		Not Shown	Shown	Shown	Shown	Shown	Family Housing	Shown

(Cont.): East Garrison Building Numbers

Common #	Common Name	Aerial 1940 (1940a and 1940b)	Aerial 1940 (1939 to 1941)	Map Nov. 1940	Map June/ July 1941	Map 15 July 1941	Map 29 Feb 1959	Map 1972
T-25, T-26		Not Shown	Not Shown	Kitchen & Mess Hall	Shown	Shown	Mess & Food Supply	Shown
T-71 , T-73		Not Shown	Not Shown	Em-lat?	Shown	Shown	Barracks	Shown
T-85		Not Shown	Not Shown	Not Shown	Shown	Shown (w/o addition)	Recreation	Shown
T-87 and T-97		Not Shown	Not Shown	Recreation	Shown	Shown	Recreation	Shown
T-86, T-88, T-98, T-99, T-100, T-106, T-107, T-108	Wood Frame Building	Not Shown	Not Shown	Not Shown	Shown	Shown	Recreation	Some Shown
T-92	Theater	Not Shown	Not Shown	Theater	Shown	Shown	Recreation	Shown
T-101				Post Office	Post Office	Post Office	Warehouse and Shop	Shown
T-104		Not Shown	Not Shown	Not Shown	Shown	Shown	Administration	Shown
T-105		Not Shown	Not Shown	Firehouse	Shown	Shown	Special Building	Shown
T-120		Not Shown	Not Shown	Warehouse	Shown	Shown	Warehouse	Shown
T-121		Not Shown	Not Shown	Warehouse	Not Shown	Shown	Warehouse	Shown
T-123		Not Shown		Shown	Shown	Shown	Special Building	Shown
T-128	Battle Simulation Building	Not Shown	Not Shown	Not Shown	Not Shown	Not Shown	Recreation	Shown
T-132		Not Shown	Not Shown	Smaller-Warehouse Insulated	Smaller Building	Smaller Building	Warehouse	Shown
T-135	Chapel	Not Shown	Not Shown	Not Shown	Shown	Shown	Special Building	Shown
T-138		Not Shown	Not Shown	Not Shown	Shown	Shown	Repair Shop	Shown
T-140		Not Shown	Not Shown	Not Shown	Shown	Shown	Repair Shop	Shown
T-142		Not Shown	Not Shown	Not Shown	Not Shown	Not Shown	Not Shown	Shown
Source: Archaeological Resources Group, January 2004.								

NATIONAL REGISTER OF HISTORIC PLACES ELIGIBILITY

Under NEPA and CEQA, resources that meet the criteria for listing on the NRHP are considered significant historic resources. Although there has been much discussion about the potential for a National Register District, the East Garrison buildings have not been previously formally listed on the NRHP.

Under CEQA, resources that meet the criteria for listing on the CRHR are considered historic resources. California properties formally determined eligible for, or listed on, the NRHP are automatically listed on the CRHR.

Of the over 75 buildings at East Garrison, the 34 permanent concrete buildings are considered significant historic resources under CEQA because they have been determined by the State Historic Preservation Officer (SHPO) to be eligible for the NRHP and by default, the CRHR.

The East Garrison appears to be eligible as a National Register District under Criterion A, for its association with events that represent broad national patterns of United States history. The East Garrison is significant as a representation of the partnership between the Work Progress Administration (WPA) and the military, and the Army's massive mobilization efforts prior to World War II. The concrete buildings, sidewalks, rock retaining walls, and many of the roadways at the camp were constructed by WPA crews for use by the Army. The relationship between the New Deal program and the Army was typical; WPA crews throughout the country were assigned to military projects. Many of the military bases in northern California were built or enlarged by the WPA. Similarly, the wood-frame structures at the East Garrison were part of the same nationwide mobilization program designed to build cantonments in which to house and train the expanded World War II Army. In 1939, the Army had a housing capacity of only 200,000. Historic maps of the East Garrison are shown in Exhibits 4.8-2 and 4.8-3. Primarily through the construction of temporary buildings such as those at the East Garrison, this number was increased to 6,000,000 by the close of the mobilization program in the fall of 1944.

The East Garrison district was determined eligible for the National Register by consensus of SHPO, the Army, and Monterey County through the Section 106 process. On July 22, 2003, East Garrison Partners I, LLC hosted a tour of the Historic District at the East Garrison, Fort Ord, Monterey County, California. The group included representatives from ARG, Urban Community Partners, Dr. Knox Mellon (State Historic Preservation Officer), Stephen Mikesell (Deputy SHPO), Timothy Brandt (Senior Restoration Architect - Office of Historic Preservation [OHP]) Hans Kreutzberg (State Historian III [OHP]), and Michael Kelly (Preservation Officer for the Presidio of Monterey and Fort Ord). The group toured the site and discussed ARG's findings on East Garrison.

OHP staff and the SHPO determined that it would be best to retain the Historic District as had been established by past correspondence between SHPO and the Army (see Appendix I of this DSEIR for a full summary of this correspondence). All agreed that as the project moves forward, the boundaries and contributors of the Historic District are to remain as established by this past correspondence. Only the 34 concrete buildings are considered Historic District contributors. The metal buildings located in Tent Area 1, which were previously included as contributors, were determined to have been constructed in 1972, and are therefore not contributors to a potential district.

The temporary wood-frame buildings from the World War II mobilization period at East Garrison are addressed in a nationwide programmatic agreement, issued June 7, 1986, regarding temporary

buildings. The resulting document, 'World War II and the U.S. Army Mobilization Program: A History of 700 and 800 Series Cantonment Construction, completes all mitigation measures necessary for the transfer or removal of the wood temporary building by the Department of Defense.

The 34 Historic District contributors include concrete Mess Halls, Latrines, Warehouses, and other miscellaneous concrete buildings. In addition to the Historic District contributors, other features from the WPA and Army mobilization period remain including: rock retaining walls; sidewalks stamped WPA; road configurations; cantonment areas; and building foundations.

All resources listed in or formally determined eligible for the NRHP are eligible for the CRHR. Therefore, the district appears to be eligible for the CRHR as well. Because the buildings appear to be eligible for both NRHP and CRHR, they are considered significant historic resources under NEPA and CEQA.

The East Garrison is not currently designated as a Monterey County Historic District under the local preservation ordinance. However, Monterey County Ordinance No. 03795 states that a resource within the County may be designated a historic district if such improvement, natural feature, site, or area meets the criteria for listing on NRHP, CRHR, or one of a number of local conditions. Since the East Garrison Historic District is eligible for the NRHP, it may qualify as a Monterey County Historic District.

Integrity Analysis

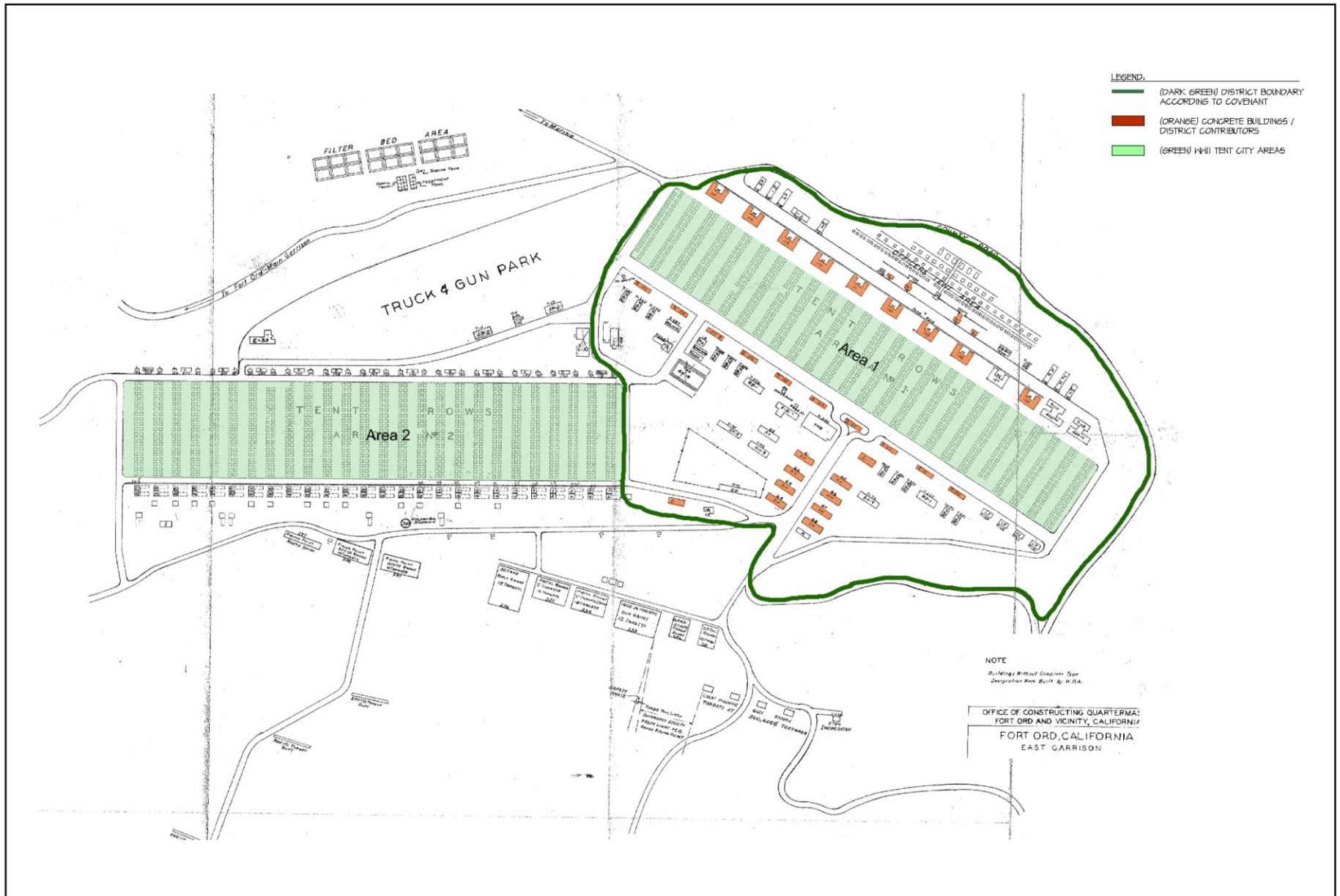
In addition to documenting the process described above, the HRA prepared for the EGSP included an analysis of the integrity of the identified historic resources at East Garrison as it is affected by the proposed plan. As noted earlier, to be eligible for either the NRHP or CRHR, a resource must not only be historically or architecturally significant, it must also retain integrity, or the ability to convey its significance. Integrity is grounded in an understanding of a property's physical features and how they relate to its significance within one or more contexts. Integrity involves seven aspects: location, design, setting, materials, workmanship, feeling and association. For full definitions of these seven aspects, see the HRA in Appendix I of this DSEIR.

In order to establish a context for that discussion, a brief description of the site, in its current state, and the proposed EGSP is provided here.

Fort Ord-East Garrison

Fort Ord encompasses over 28,000 acres, most of which is undeveloped. The East Garrison is located at the northeast edge of Fort Ord, on a bluff overlooking the Salinas Valley. The East Garrison currently consists of over 75 buildings and structures. The majority of buildings are either wood-frame or concrete structures; both types were built in the early 1940s. In addition to the buildings, there are numerous concrete foundations, sidewalks, and tent pads, as well as rock retaining walls. Most of the buildings are arranged around a long rectangular field, which historically functioned as a tent city. The northwest end of the field has been paved, and there are several metal warehouses.

Of these buildings and structures, 34 of the concrete buildings at the East Garrison are considered significant historic resources under CEQA because they have been determined by the SHPO to be eligible to the NRHP and by default, the CRHR (see Exhibit 4.8-4). The individual buildings are described in greater detail on the Department of Parks and Recreation (DPR) forms that are included as part of the HRA in Appendix I.



Source: Archaeological Resources Group, January 2004.





Source: Archaeological Resources Group, January 2004.

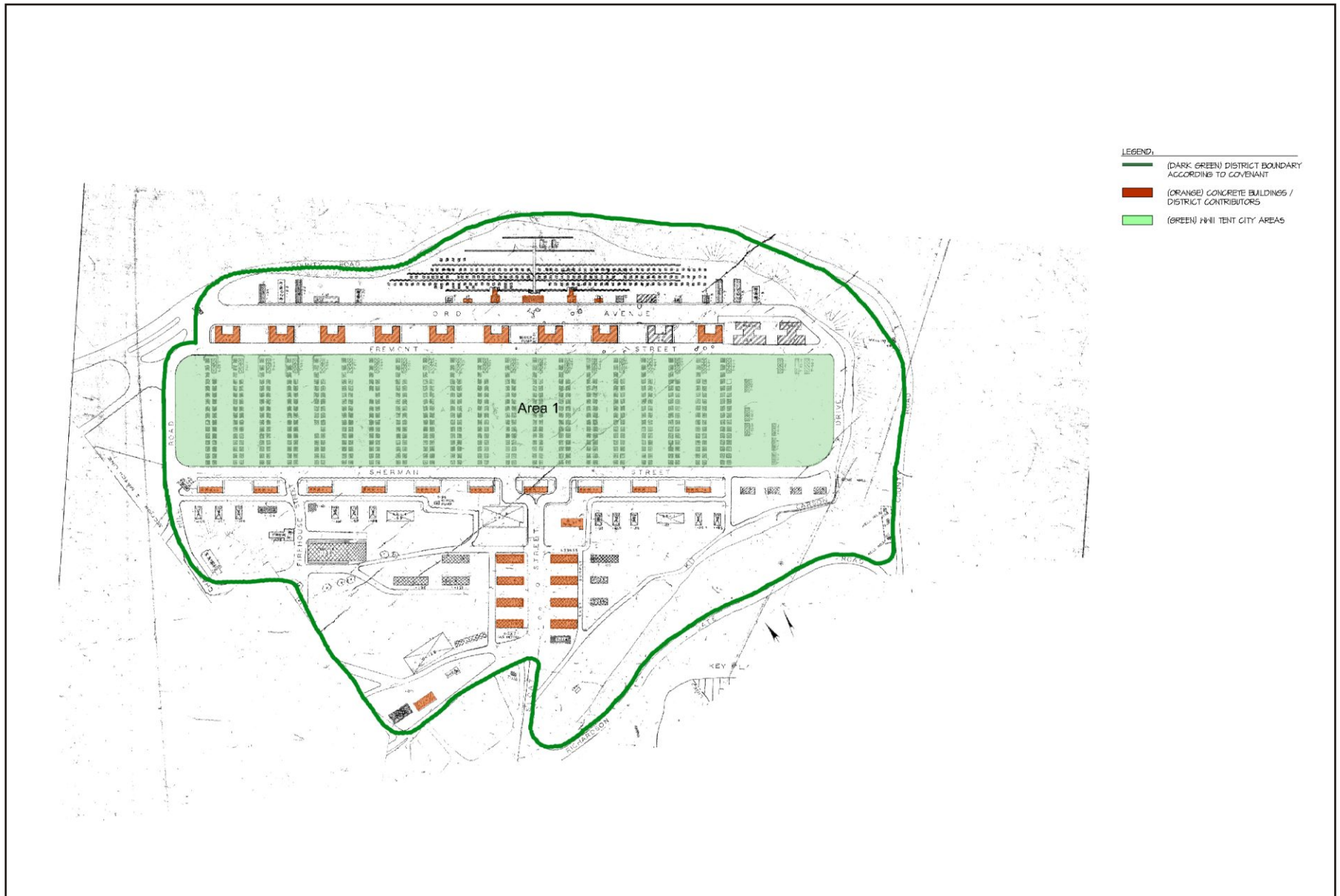


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Exhibit 4.8-3
Historic Map - November 28, 1941

EAST GARRISON SPECIFIC PLAN • DSEIR



Source: Archaeological Resources Group, January 2004.



East Garrison Specific Plan

As indicated in the Project Description in Section 3 of this DSEIR, the EGSP is a comprehensive land use plan (Specific Plan per Government Code Section 65460 et seq.) for the development of approximately 244 acres at the East Garrison, Fort Ord, Monterey County, California. The EGSP proposes the development of a new community with mixed uses including residential, commercial, civic, cultural, and open space. It allows for the construction of approximately 1,470 residential dwelling units, 75,000 (sq ft) of commercial space, 11,000 sq ft of institutional uses, and approximately 50 acres of preserved open space and improved parks. In addition, many of the existing historic concrete buildings will be converted into approximately 100,000 sq ft of affordable studio space for visual, performing, and literary artists, as well as arts-related administrative work and classroom space. The historic concrete buildings are located between the main entrance on Reservation Road and Watkins Gate Road. The buildings are clustered along Ord Avenue, Sherman Street, and Sloat Avenue. The EGSP calls for the historic buildings to be integrated into the surrounding community by retaining their historic orientation and much of the historic street pattern.

The new development will consist of three residential neighborhoods (Phases 1, 2, and 3) surrounding a mixed-use town center. According to the Specific Plan, Phase 1 will include approximately 398 residential units, Phase 2 will include approximately 471 residential units, and Phase 3 will include approximately 442 residential units. These numbers do not take into account commercial, civic, or other non-residential uses. Housing in Phases 1 and 2 will consist of several different building types ranging from apartment residences to single-family detached houses. New houses in these neighborhoods will be constructed in one of four vernacular styles as defined in the East Garrison Pattern Book: Garrison Craftsman, Picturesque Camp, Mediterranean Revival, or Garrison Revival.

The Arts District, which is included in Phase 3, will consist of both new buildings and renovated historic East Garrison concrete structures. Of the 34 historic concrete buildings, 23 will be renovated and 11 will be demolished (see Exhibit 4.8-4). In addition to the 23 concrete buildings, the EGSP calls for the retention of three of the World War II era wood-frame buildings: the Chapel, Theater, and Battle Simulation Building, if feasible. Between the renovated historic structures and the new buildings, the artist area within the Arts District will consist of approximately 65 live/work units, a theater, studio spaces, performance space, and a park.

ARCHAEOLOGICAL SETTING

Most of East Garrison can be characterized geologically as younger (Holocene) stabilized dunes. With the exception of ephemeral lakes, the area generally lacks potable water. Although the seasonal lakes would have attracted more recent aboriginal populations, the potential for a late Pleistocene/mid-Holocene bluffline extending under East Garrison would have been a likely home for very early (ca. 7000 Before Present) populations. This 16,000 to 6,000 year-old buried bluffline overlooking the former estuary of Salinas River should contain a high potential for PaleoIndian deposits (Johnson 1993:28-29).

Prehistoric Archaeology

Native Americans are believed to have settled in the Monterey Bay region as early as 10,000 years ago, and information from archaeological methods is increasing. Europeans were fast to develop the area, and often took a pejorative view of the aboriginal population. Early investigations were small, scattered excavations resulting in only a few publications. After performing an archaeological survey of northern Monterey County (1948), Pilling takes credit for writing an early and important thesis on the evidence of prehistoric habitation (University of California at Berkeley 1948).

At the time of European contact, the Rumsen tribelet of Costanoan (also called Ohlone) speakers occupied the area comprising East Garrison (Levy 1978: 485, Figure 1). Rumsen is one of the eight similar Costanoan languages that were spoken by aboriginal populations living along the central California coast. The term 'Costanoan' was used first by Spanish missionaries who grouped these Native Americans, who spoke similar languages and lived in the coastal region between Monterey and San Francisco. The Mutsun and Chalon tribelets of Costanoan speakers lived north and southeast of the Rumsen. Speakers of two other dialects, Esselen and Salinan, lived to the south and well beyond East Garrison lands (Levy 1978: Fig. 1; Heizer 1978: Fig. 1). The Ensen Group lived in the Spreckels and Buena Vista areas, including the Toro area at the eastern edge of Fort Ord (Breschini, personal communication 2004.). The Costanoan language is only one part of the complex Utian language family of which dialects were spoken throughout the West (Shipley 1978:84 as cited in Milliken 1995:24).

Differences in cultural practices such as dance, ritual, and mythology existed between the speakers of different dialects in aboriginal California. Generally, however, it is accepted that other cultural features—such as social and political paradigms of belief and practice—were shared among Native Americans in the Monterey Bay region.

By the late 1700s, the Spanish recruited members of the Rumsen tribelet to the mission, who thereafter lost not only many members due to illness and violence, but their traditional lands. Descendants of the Rumsen, along with numerous other Native Americans, are now working to retrieve their cultural identities and traditions. By performing historic research and pursuing state and federal recognition as tribal entities, they are also trying to revitalize their ties to the land.

Historic Archaeology

Other than information on the Monterey Presidio, there are notable deficiencies in the database for Monterey County. Although the cultural record began over 10,000 years ago—and the historic record over 400 years ago—the resources are largely destroyed. This is due to early agriculture, military, and urbanization methods that were performed prior to the enactment of any protection measures for cultural resources.

As indicated previously, East Garrison is covered with the remnants of intensive military training and habitation. The U.S. government bought the area in 1917 for troops to practice horse-drawn artillery and cavalry maneuvers. From 1933 to 1935 East Garrison was known as 'Camp Ord,' a Civilian Conservation Corps (CCC) camp that led to the construction of barracks, mess halls, and a number of service buildings. A number of them still exist and form an emerging NRHP district. Buildings for the Historic District nomination were recorded by ARG and are included in their January 2004 draft report. Numerous historic archaeological features (such as training grounds and foundations), however, remain unrecorded and should be included in the Historic District record.

Also specific to the East Garrison historic archaeology is the Whitcher Family Cemetery, containing five gravestones. The ca. 1870s graves of Harry, Flora, Elvira, Ned Elger Whitcher and Mary H. Pearson are marked with five white stones and a large wood cross. Only the latter was deceased in the 1900s.

Summary of Existing Prehistoric Archaeological Documents and Record Searches

Existing documentation, including EIRs, Environmental Impact Statements (EIS), inventories, and evaluations related to prehistoric archaeology at the East Garrison site and the surrounding areas, was

reviewed as part of this cultural resources assessment. A record search was also conducted at the Northwest Information Center (NWIC).

The archaeological investigations at the former Fort Ord have been largely sporadic, unavailable, incomplete, or lacking in organization. Information gained from initial reports was not compiled sufficiently for use in subsequent investigations. Moreover, in general, existing archaeological documents are lacking in interest and in information on historical archaeology. Full references to documents and the complete results of the record search are contained in Appendix I of this DSEIR.

4.8.2 Project Impacts and Mitigation Measures

THRESHOLDS OF SIGNIFICANCE

The proposed project is considered to have a significant cultural resources impact if it will:

- Eliminate important examples of major periods of California history or prehistory;
- Cause a substantial adverse change of a historic resources as defined in Section 15064.5 of the CEQA Guidelines;
- Cause damage to important archaeological resources as defined in Section 15064.5 of the CEQA Guidelines; or
- Disturb any human remains, including those interred outside of formal cemeteries.

A ‘substantial adverse change’ means ‘physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource is impaired.’ Material impairment means altering ‘in an adverse manner those characteristics of an historical resource that convey its historical significance and its eligibility for inclusion in the California Register of Historical Resources.’¹

Impacts to historical resources not determined to be significant according to any of the significance criteria described above are not considered significant for the purposes of CEQA. Generally, under CEQA, a project that follows *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or *The Secretary of Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures* is considered to have mitigated impacts to a historical resource to a less than significant level (CEQA Guidelines 15064.5). Section 15126.4 (b)(2) of the CEQA Guidelines notes that in some circumstances, documentation of a historical resource may not mitigate the effects to a less than significant level.

METHODOLOGY

ARG conducted a historic resource assessment of the East Garrison. The assessment included a site visit, and research at the Presidio of Monterey Historian’s Office, Base Realignment and Closure Commission (BRAC) Historic Preservation Office, BRAC Department of Public Works, the Pat Hathaway Photograph Collection, Monterey Public Library, California room, and Monterey County Parks and Recreation Department.

¹ CEQA Guidelines §15064.5.4(b)1

For the assessment, built resources on the project site were evaluated for NRHP and CRHR eligibility as a Historic District. In order to determine if the East Garrison qualifies as a Historic District, seven historic contexts were created for the area. These contexts were reviewed and discussed by the SHPO officer, the Deputy SHPO Officer, and various other state and local historian officers, who finalized the district boundaries and significance.

MBA conducted a literature search and field survey for archaeological resources. The literature search included examination of maps and reports located at the NWIC, review of the *California Inventory of Historical Resources* and *Historic Property Directories*, and a review of reports and articles specific to Monterey County. Maps and information from previous field surveys were used in the field to determine field survey transect width. The field survey examined all exposed bedrock for potential bedrock mortars or seed grinding use. All historic military intensive-use areas were surveyed, as well. A photographic reconnaissance was conducted. No subsurface sampling was performed.

IMPACT ANALYSIS AND MITIGATION MEASURES

Historical Resources

Impact 4.8.1 Implementation of the EGSP will result in the demolition of eleven NRHP-eligible buildings and alter the integrity of the East Garrison National Register Historic District. (Significant and Unavoidable)

The project site contains the NRHP-eligible East Garrison Historic District. The contributing buildings of the Historic District gain their significance from their relationship with the surrounding contributing structures and are not individually significant under the NRHP or CRHR.

As described above, the 34 concrete buildings at the East Garrison are considered significant historic resources under CEQA because they have been determined to be eligible for the NRHP and by default the CRHR by the SHPO. The Historic District also appears to meet the requirements to be a Monterey County Historic District. The demolition of 11 of the 34 contributing structures results in a major loss of historic fabric, adverse change to the setting of the Historic District, and destroys the relationship between many of the buildings. The demolition of the buildings contributes to the substantial adverse change in the Historic District.

The following evaluation analyzes, in detail, the impact of the demolition of historic resources as well as the construction of new infill on the integrity of the Historic District.

Integrity Analysis

The analysis below includes a discussion of each of the seven aspects of integrity with respect to the historic resources at Fort Ord, East Garrison, and how they will be affected by the EGSP. A full definition of each of these aspects is in the HRA (Appendix I).

1. **Location** is the place where the historic property was constructed or the place where the historic event occurred.

The East Garrison Historic District remains in the location where it was developed. New construction will not have an impact on the location of the Historic District.

2. **Design** is the combination of elements that create the form, plan, space, structure, and style of a property.

The contributing buildings of the East Garrison Historic District were designed as rows of identical structures. Rows of mess halls flanked one side of the cantonment area while the latrines flanked the other; the rows were of approximately the same length and defined a central space with a rectangular plan. The arrangement of the buildings is the result of the function of the site; long parallel rows gave soldiers camped in the cantonment space easy access to mess halls and latrines. Warehouses, an auxiliary function, were placed on Sloat Street perpendicular to the other structures. The demolition of all but two Latrines would impair the original design of two roughly equal rows of mess halls and latrines. Similarly, the construction of a large number of buildings in the cantonment area between the mess halls and latrines damages the relationship between the two building types.

3. **Setting** is the physical environment of a historic property.

Historically the East Garrison was a remote camping site, surrounded by acres of brush-covered training areas. The cantonment area between the concrete mess halls and latrines was filled with tent rows divided by dirt alleys. Function and uniformity took precedence over the natural setting. Although a portion of the cantonment area has been paved, and there are several large modern warehouses (alterations made in the 1970s), the extent of the original cantonment area and relationship between the mess halls and latrines is still visible. From most positions within the post, the long rows of identical buildings were (and are) visible. The proposed project calls for the construction of high-density, multi-story, residences, commercial, cultural, and civic buildings. The new construction would visually and physically separate many of the historic buildings, especially the mess halls and latrines. In addition, the new infill will change the setting of the Historic District contributors from one of a largely open, military camp in a natural setting to a dense highly-designed urban landscape.

4. **Materials** are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

The Guidelines for Rehabilitating Buildings at the East Garrison calls for the rehabilitation of the remaining historic district contributors according to The Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures (*The Standards*). If projects involving the historic district contributors are undertaken according to The Standards, the materials of these buildings will remain intact. However, the demolition of 11 of the 34 potential historic district contributors represents a substantial loss of historic material.

The *East Garrison Pattern Book* calls for a wide variety of materials to be used in the construction of the new building types. For example, walls can be built or clad in fiber-cement clapboard, stucco, board-and-batten siding, wood clapboard, finished concrete, tilt-up concrete, concrete block, or stucco. Roofs can be covered in composition shingles, flat or barrel concrete tile, 5v crimp metal, architectural asphalt shingles, or standing-seam metal roofing. Although some of these materials, such as the tilt-up concrete, concrete block, stucco, and barrel concrete tiles, are compatible with the concrete historic district contributors, many of the materials are out of character with the historic district contributors' concrete walls (some covered with stucco) and red tile roofs.

5. **Workmanship** is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

More than one example of each type of repeated structure (such as mess halls, latrines, warehouses, and miscellaneous buildings) will be preserved.

In cases where there was historically only one example of a building type (Buildings 14, 91, and 124) the building will be preserved. Examples of the workmanship of the WPA will be retained.

6. **Feeling** is a property's expression of the aesthetic or historic sense of a particular period of time.

Historically the East Garrison had simple uniform buildings in a rectilinear site layout surrounded by rugged terrain. The standardization of buildings and regularity of site plan reflected the army's imposition of order. All of the Historic District contributors are relatively unornamented, utilitarian, one-story structures. The construction of a large number of multi-story, closely spaced, residential, commercial, cultural, and civic buildings will create the feeling of a dense town rather than a secluded military training ground.

7. **Association** is the direct link between an important historic event or person and a historic property.

The EGSP calls for the demolition of a significant number of Historic District contributors and allows for the construction of dense, multi-story infill. To the observer the resulting urban environment will no longer convey the partnership between the WPA and the Army during the military's massive mobilization efforts prior to World War II.

In summary, the project will not affect two aspects of the East Garrison Historic District's integrity: the Historic District will remain in its original **location**, and the **workmanship** will be retained in the remaining Historic District contributors. However, the project has a negative impact on five aspects of the Historic District's integrity:

- The demolition and infill called for by the project will obscure the original **design** of the site layout and relationship between the buildings.
- The **setting and feeling** of the Historic District will change from a largely open military camp with natural setting to a dense town with residential, commercial, cultural, and civic buildings.
- The demolition of 11 Historic District contributors results in a significant loss of historic **material**.
- Finally, because of the amount of demolition of Historic District contributors and the large amount of new infill construction, the site will not be recognizable as a World War II mobilization bivouac site and this **association** will be lost.

The project will result in an overall loss of integrity that contributes to the substantial adverse change in the Historic District. Although there is a substantial adverse change to the Historic District, there

are elements of the EGSP that lessen the impact of the project, although not to a less than significant level. These elements include:

- Preparation of the East Garrison HRA.
- Preparation of the Guidelines for Rehabilitating Buildings at the East Garrison, Fort Ord, Monterey County, California.
- Retention of several World War II temporary wood buildings (non-contributors to Historic District).
- Incorporation of historic roadway configurations including Sherman Street, Kit Carson Drive, Fremont Street, and Sloat Street.
- A new street layout within the former cantonment area that respects the historic pattern of tent rows.
- Retention of open space along the northeast and southeast bluff.
- Creation of central green space, called the Arts Park, in a central portion of the historic cantonment area. The green space connects the Mess Halls with the remaining Latrines and the Warehouse.

Implementation of the project elements, as outlined above, will not reduce impacts to historic resources to a less than significant level, since the project still results in substantial adverse change in the significance of the Historic District.

Mitigation Measures

- 4.8.1-A** No demolition of Historic District contributors shall occur until Phase 3 begins or demolition is required for the construction of adjacent properties or infrastructure in Phases 1 and 2.
- 4.8.1-B** Prior to demolition of any buildings by the landowner, all buildings shall be maintained per the guidelines found in National Parks Service Preservation Brief #31, Mothballing Historic Buildings.
- 4.8.1-C** Prior to the issuance of demolition permits for contributing structures, a preservation consultant shall be hired by the project applicant to create a construction-monitoring plan that will ensure rehabilitation of the Historic District contributors is in compliance with the Guidelines for Rehabilitating Buildings at the East Garrison.
- 4.8.1-D** Prior to the issuance of demolition permits for any contributing structures for Phase 1 and 2 construction, HABS/HAER Level I (drawings, photographs, written data) documentation of 1 of each of the major Historic District contributor types (Mess Halls, Latrines, and Warehouses) as well as other types of Historic District contributors shall be prepared by a qualified architectural historian in consultation with the local preservation agencies and the Army. The remaining types of concrete buildings shall be documented to HABS/HAER Level III.
- Oral histories should be included as part of written data.

- Distribution of complete HABS/HAER report to local repositories such as:
 - East Garrison Library
 - Monterey County Free Library
 - Salinas Public Library
 - Monterey Public Library
 - Monterey County Parks and Recreation Department
 - Northwest Information Center

- 4.8.1-E** Prior to demolition of contributing structures for Phase 3 construction, an Interpretative Exhibit at East Garrison Library shall be created by the project applicant temporarily in the Chapel with graphic panels documenting the history of the military post, Works Progress Administration (WPA) involvement, and construction techniques. Said Exhibit shall be reviewed and approved by the MCPBID.
- 4.8.1-F** Prior to demolition, copies of plans, photographs, research material and other documentation shall be collected by the project applicant and donated to a repository with professional archival staff and storage.
- 4.8.1-G** Prior to demolition, An East Garrison History Walk Plan interpreting the development of site and the role of WPA and Army shall be created and implemented by the project applicant. The walk shall include signs that are self-guided and durable. Said Plan shall be reviewed and approved by the MCPBID in conjunction with the Parks and Public Works Department. Said Plan shall include a phasing schedule for development of the walk in conjunction with project specific development of the Specific Plan to ensure public health, welfare, and safety, during construction.
- 4.8.1-H** Prior to issuance of grading permits for Phases 1 and 2, the subdivider/developer shall submit, to MCPBID and the State Historic Preservation Officer (SHPO), a historic preservation plan. The plan shall be subject to the requirements of the Agreement and Covenant associated with this land parcel, and shall be consistent and in conformance with *The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures*. The Applicant shall submit certification from the Redevelopment Agency of Monterey County to the MCPBID that the proposed plan is financially feasible. Grading permits shall not be issued until Monterey County approves the Plan in consultation with SHPO and until the Redevelopment Agency certifies the feasibility.
- Prior to demolition, grading or building permits, within the proposed East Garrison Historic District, the County of Monterey and the developer of the Historic District shall execute an agreement to implement the Historic Preservation Plan. The agreement shall include a timetable for completion and method for achieving the timetable commitments.
- 4.8.1-I** Phase 3 of East Garrison as determined by the land conveyance the Army and SHPO shall be nominated as a Monterey County Historic District. To nominate a property locally, the applicant fills out Department of Parks and Recreation form 523 (both the

Primary Record and the Building Structure Object Record) and submits them to the Historic Resources Review Board (HRRB). The HRRB then makes a recommendation to the Board of Supervisors to list the property. The Board of Supervisors has the final vote.

- 4.8.1-J** Wherever feasible, materials from said demolitions shall be store for future repairs within the district. If reuse is infeasible said materials shall be stored for future repairs or made available for donation to local non-profit agencies.

Significance After Mitigation

Significant and unavoidable.

Archaeological Resources

Impact 4.8.2 **During construction on the EGSP site, there is the potential for buried archaeological resources, including human remains, to be disturbed during earth moving activities. (Less than Significant After Mitigation)**

The field survey included an inspection of exposed bedrock and random inspections of back dirt from numerous rodent holes. Historic military uses, many of which were obscured either partially or entirely by grasses and shifting sand deposits, were surveyed using 20 foot transects and numerous ground features were photographed. The results of the field survey for surface prehistoric resources were negative. However, there remains a significant potential to find relatively old (12,000 BP to 6,000 BP) buried archaeological resources at East Garrison. The Salinas aquiclude formation (clay) under East Garrison formed in brackish water that covers the study area, which would have overlooked the ancient estuary that formed the bluish clay. Since estuaries provide abundant food resources, PaleoIndian and early Holocene villages may have existed along the bluff of East Garrison. These deposits may contain significant archaeological sites and should be considered when construction and especially deep excavation occurs.

In addition, a small area within, and the area immediately south of, East Garrison contain seasonal fresh water ponds. In California, these pools have a high potential for possessing archaeological resources. The hunting and gathering activities performed at these pools would have resulted in prehistoric encampments or village sites.

Mitigation Measures

- 4.8.2-A** A qualified archaeologist shall monitor the site during all potential ground disturbance activities. The archaeologist shall prepare a monitoring plan that details the procedures that shall occur in the event that cultural resources are uncovered. At a minimum, all excavation shall cease within 5 meters of the discovery until it is evaluated by a qualified cultural resource specialist and/or County coroner, as applicable.
- 4.8.2-B** Prior to the issuance of grading permits, the applicant shall obtain current status of Letters of Intent to Petition from the Bureau of Indian Affairs, for federal recognition by the following entities: Costanoan Band of Carmel Mission Indians, Ohlone/Costanoan Muwekma Tribe, Indian Canyon Band of Costanoan/Mutsun Indians, Salinan Nation, Amah Band of Ohlone/Costanoan Indians, Esselen Tribe of Monterey County, Ohlone/Costanoan-Esselen Nation, the Ensen Tribe, Salinan Tribe of Monterey County, Costanoan-Rumsen Carmel Tribe, and Costanoan Ohlone Rumsen-Mutsun Tribe.

- 4.8.2-C** A Memorandum of Agreement shall be prepared between the County, recognized local Native American descendants, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding the presence/absence of Traditional Cultural Properties (TCP) at East Garrison. If TCPs are found to exist therein, ensure that the protection covenants, discussed under Program A-2.2 of the FORA EIR, are in place prior to project commencement.
- 4.8.2-D** If, during the course of construction, cultural, archaeological, historical or paleontological resources are uncovered at the site (surface or subsurface resources) work shall be halted immediately within 50 meters (165 feet) of the find until a qualified professional archaeologist can evaluate it. The MCPBID and a qualified archaeologist (i.e., an archaeologist registered with the Society of Professional Archaeologists) shall be immediately contacted by the responsible individual present on-site. When contacted, the project planner and the archaeologist shall immediately visit the site to determine the extent of the resources and to develop proper mitigation measures required for the discovery.
- 4.8.2-E** Prior to the commencement of project excavations, all construction personnel shall read and sign an agreement that describes and protects Native American remains and any/all potential, subsurface cultural resources.
- 4.8.2-F** An archaeological sensitivity map of East Garrison shall be prepared. The map shall incorporate former, current, and future theoretical information regarding potential prehistoric deposits. Existing conditions (i.e. buildings, roads) and future plans (i.e. trenching for residential projects) and potential impacts to archaeological resources shall be taken into consideration when developing the map.
- 4.8.2-G** The expertise of local archaeological specialists shall be utilized for the preparation of subsequent cultural resources reports at East Garrison.
- 4.8.2-H** All future Army documents and related material regarding cultural resources at Fort Ord shall be provided to the California Historical Resources Information System, Northwest Information Center at 1303 Maurice Avenue in Rohnert Park, California 94928-3609.
- 4.8.2-I** If archaeological resources or human remains are accidentally discovered during construction, the following steps will be taken:
- There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
 - The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and
 - If the coroner determines the remains to be Native American:
 - The coroner shall contact the Native American Heritage Commission and MCPBID within 24 hours.

- The Native American Heritage Commission shall identify the person or persons it believes to be most likely descended from the deceased Native American.
 - The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or
 - Where the following conditions occur, the landowner or his authorized representatives shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.
- The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.
 - The descendent identified fails to make a recommendation; or
 - The landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

Significance After Mitigation

Less than significant.

